

# *Winterwood Privacy Policy for Clients*

*Last Updated: May 2019*

**WE WILL RESPECT YOUR PRIVACY AND YOUR CHOICES.**

## 1 Who Are We?

Winterwood Tutors Ltd (“Winterwood”) is a private tuition agency and education consultancy. We advise clients on educational matters, introduce tutors to clients for long- and short-term placements, and run a variety of events and courses. We are a Data Controller as defined in the GDPR.

As a Data Controller, Winterwood is responsible for the data that you share with us. Winterwood adheres to the GDPR from May 25th 2018.

## 2 Contact Details

You can contact Winterwood at any time to:

- Request access to the information that Winterwood has about you
- Correct any information that Winterwood has about you
- Delete all information that Winterwood has about you (subject to our legal obligations to maintain certain data for statutory purposes e.g. tax reporting)
- Unsubscribe from our mailing list

Please contact Winterwood on [contact@winterwood.tutors.co.uk](mailto:contact@winterwood.tutors.co.uk) or 07498 058525 or in writing at Dalton House, 9 Dalton Square, Lancaster, LA1 1WD

## 3 Access to Information

You have the right to access all the information we have about you by asking to view a copy of the data we process about you. We will fulfil this request by sending you the information electronically unless your request expressly specifies a different method.

## 4 Information Correction and Personal Data

If you believe any information we have about you is incorrect, you are welcome to contact us so we can update it and keep your data accurate. If at any point you wish us to delete the information we have about you, you can simply [contact@winterwood.tutors.co.uk](mailto:contact@winterwood.tutors.co.uk) or 07498 058525.

## 5 Intended Use of Personal Data

In order to provide tuition services, education consultancy or any other services, an employee of Winterwood may need to collect some of your personal data. We may collect data that you choose to share with us via phone calls, email enquiries, online forms and messages sent to us via apps or social media.

This may include (but is not limited to): your contact details, home address, name, the names of your children, information related to the student’s educational background, goals, grades, employment, special educational needs and health where relevant to the tuition services requested. Some of this data is considered sensitive and we take your privacy very seriously. By sharing this personal data you are giving consent for us to process the data for the specific purpose of delivering our services.

## 6 Who Can Access Your Personal Data

Your personal data may be accessed by the employees of Winterwood in order to advise on, or deliver, tuition services or consultancy work and for business administration purposes, legal compliance, to obtain feedback, insight and analysis and for marketing communications.

If tuition services form part of your enquiry, your personal data may be passed on to one or more self-employed tutors with the specific purpose of enabling them to provide appropriate and effective tuition services. By providing personal data, which may include sensitive information, that is related to a request for tuition, you are giving us consent to share the information with one or more tutors.

We rely on third party organisations to provide applications/functionality, data processing, marketing or IT services to us. We only provide them with the information they need to fulfil the service, and we require that they do not use your personal data for any other purpose.

We also share personal data with third party organisations such as lawyers, accountants and other professional advisers.

We always use our best efforts to make sure that all third parties we work with will keep your personal data secure and comply with GDPR regulations. All data collected by Winterwood is stored exclusively in secure hosting services.

We may disclose your data to third parties if we are under a duty to comply with a legal obligation, or in order to enforce or apply our terms of service or other terms and conditions you have agreed to, or to protect the rights or safety of Winterwood or the tutors we represent.

We may disclose your information to third parties in the event that we sell any or part of our business or assets. In such cases, your personal data will be processed by the buyer acting as the new data controller and its privacy policy will govern the processing of your personal data.

Where Winterwood transfers personal data outside of the EEA, this will be done in a secure and lawful way. As some countries may not have laws governing the use and transfer of personal data, we will take steps to make sure that third parties adhere to the commitments set out in this Privacy Policy. These steps may include reviewing third parties' privacy and security standards and entering into appropriate contracts.

## 7 How Long Will We Keep Your Personal Data?

We will keep your personal data for as long as we need it to provide you with your requested service(s) or to meet our commercial or legal obligations. We may contact you periodically to update your personal data. To determine the retention period of your personal data, we consider several criteria to make sure that we do not keep your personal data for longer than is appropriate. These criteria include:

- The purpose for which we hold your personal data;

- Our legal and regulatory obligations in relation to that personal data, for example any financial reporting obligations;
- Whether our relationship with you is ongoing: for example, you are still working with one or more tutor; you still wish to continue to receive marketing communications related to events and updates; you regularly or occasionally contact us for consultancy, courses or other services. Clients frequently return to us for tuition services after a break, therefore in most cases we keep their personal data securely on file until there is a request for deletion;
- Any specific requests from you in relation to the deletion of your personal data.

## 8 Our Privacy Promises

- We will respect your privacy and your choices.