

## *Winterwood Privacy Policy for Tutors*

*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 represent you as a tutor, introduce you to clients and provide administrative support and billing services, an employee of Winterwood will collect your personal data. We may collect data which you offer to us in the CV you submit to us, during your interview and trial session, on your Profile Form, and in phone calls, emails, online forms and messages which you send to us via apps or social media.

This may include (but is not limited to): your contact details, home address, name, date of birth, nationality and visa status, information related to your educational background, qualifications, employment history, experience, interests, special educational needs, health and bank details.

Since the majority of tutors will work with children, we will require you to consent to obtaining and presenting us with an up-to-date DBS check (enhanced disclosure) for safeguarding purposes. We will not store your DBS check (enhanced disclosure) on our computer system but we will keep a record of its issue date and certificate number. We will not share the contents of your DBS check (enhanced disclosure) with any third parties without your specific consent.

## 6 Who Can Access Your Personal Data

Your personal data may be accessed by the employees of Winterwood in order to match you to clients, introduce you to clients, advertise tuition placements, advise on the delivery of tuition services or consultancy, and for business administration, legal compliance, obtaining feedback, insight and analysis and marketing communications.

Your personal data may be passed on to clients with the specific purpose of introducing you in order that you can provide tuition or consultancy services. By agreeing to be represented by Winterwood and by providing your personal data, which may include sensitive information, you are giving us consent to share the information with clients as and when required.

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 may 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.

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 to represent you as a tutor 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 necessary or 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, whether you are still interested in hearing about tuition placements now or in future and whether you still wish to continue to receive marketing communications related to events and updates. Tutors regularly return to Winterwood after a break, therefore in most cases we keep their data securely on file until the tutor contacts us to say they wish to be deleted.
- 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.