

GDPR / Privacy Policy

Below is the way we Kid Prodigy T/A Maxplorers UK Ltd. administer your personal information about you and your child or children.

1. Background

On 25th May 2018 The “General Data Protection Regulation” (GDPR) came into action in order to ensure proper administration of personal information. GDPR is about the way we collect, use and take care of the personal information about you and your child or children’s work at the centre. Its your right to ask the Centre Manager / Director to access the details of these guidelines.

2. Our Compliance around your Personal Information

We commit to :

- Keeping personal information about you and your child or children safe and private;
- Not to use personal information for any purpose other than in connection with your children’s work, keeping you informed of information about the Kid Prodigy business, to continue to develop the Kid Prodigy business to deliver the most effective and rewarding student experience possible and in accordance with the other purposes set out in this notice;
- Make it easy for you to approach us if you have any concerns or questions relating to the holding of personal information;
- Not provide personal information to others save where legally required to do so or in the legitimate course of business.

3. Who we are and how we operate

Kid Prodigy is a supplementary education provider in the UK and worldwide, and offers Maths, English and Computing study programmes for children of all ages and abilities.

Kid Prodigy Study Centres exist across the UK. The Instructor is responsible for and motivated to provide the Kid Prodigy study programme at the highest level possible at his or her Study Centre supported always by Kid Prodigy. Kid Prodigy supplies each Instructor with the study programmes and material together with such other support as the Instructor requires to run his or her Study Centre. It interacts closely with each Study Centre and often visits them in a continuing process of seeking to refine and improve the effectiveness of the study programmes and the student experience.

To operate effectively the Instructor and Kid Prodigy require personal information concerning parents and legal guardians (parents) and the students. We set out in this document what personal information is collected and how it is used.

The term Data Controller is applied to a business which determines how personal information about yourself and your child or children is used.

Each Instructor is known as a Data Controller. His or her details are set out in a schedule to the document. Kid Prodigy also requires personal information for similar, but slightly different purposes. As such Kid Prodigy is also a Data Controller, but a separate one from the Instructor. The contact details of the individual with overall responsibility for personal information held by Kid Prodigy is set out in a schedule to the document.

4. How information is collected from you

Information in relation to parents and students will be collected by the Instructor or by his or her assistants on the Instructor's behalf and/or by Kid Prodigy. This might be achieved by providing information verbally, whether face to face or by telephone, completion of paper documents or by electronic means such as through email or interaction with our websites. Please ensure that all personal information is accurately provided as the information which is held is only as accurate as the information provided in the first place.

If any of the personal information provided changes, please notify the Instructor as soon as possible in order that the personal information can be updated.

5. What personal information will the Instructor collect from you?

The Instructor will require the following information about the student:

- Name;
- Address;
- Contact details;
- Date of birth;
- Schooling related information;
- Gender;
- Health related information and other information relevant to being able to teach the student most effectively;

As the student's studies progress the Instructor will accumulate information in relation to the student's work and its progression.

Information which will be required from parents/legal guardians:

- Name;
- Contact details;
- Relationship to student;
- Details of others who are authorised points of contact if a primary contact is not available;
- Any other information which may be provided, and which is relevant to the education of your child or children.

The Instructor may also ask for or receive contextual information about students and/or their parents. This might, for example, relate to the student's lifestyle, interests and skills, be about the student's family including the structure of it and the occupation of the parent(s), any background issues that may be impacting upon the student's study and whether the student is a native English speaker.

The Instructor will not seek any further personal information in relation to parents or students without gaining specific authority.

The Instructor will not take or publish photographs of students or publish students' names without your consent as the parent/legal guardian.

6. Who will the Instructor provide personal information to?

The Instructor will provide the personal information referred to above to Kid Prodigy for it to use for the purposes set out below.

The Instructor will not provide personal information for use by anyone else without your specific consent or unless this is necessary for health and safety reasons, to comply with child protection policies and procedures, otherwise in relation to child welfare and child protection, for example in

cooperating with local and public authorities to comply with legal requirements and those of regulators, for example Ofsted, or unless it is otherwise provided for in this Privacy Notice.

7. What about outsourcing by the Instructor?

It is possible that the Instructor will pass personal information to other organisations to assist him or her. This is not for other organisations to use on their behalf but rather to process information on the Instructor's behalf. This will be for the efficient and effective administration and running of the business and provision of the study programme for example for IT needs including for the purposes of establishing, developing and maintaining relevant databases including the data collection system and customer relationship management, but also for purposes such as book-keeping and accounting, training and printing.

8. What will the Instructor use the personal information for?

- To fulfil his or her contractual obligations and to respond to enquiries:
- to provide the course of study;
- administer the course of study;
- ensure the quality of the programmes
- to respond to enquiries about the study offered;
- to seek feedback about study experiences;
- to address and communicate about operational issues such as the need to close a class suddenly, for example because of illness or bad weather or the need to address and make parents aware of changes to classes, for example new venues, dates and times;
- to record and/or report upon the progress of the student;
- to consider, record and communicate other issues which may be impacting upon or related to the progress of the student;
- to respond to complaints.
- To ensure vital interests:
- This relates to the health and safety of a student. For example, if there was a medical emergency the Instructor may need to provide relevant medical information about a student to the emergency services. Similarly, information may be provided to local or public authorities where welfare and child protection issues arise.

When it is the Instructor's legal duty

The Instructor may in very rare circumstances be required under safeguarding and child protection issues to provide information to local or public authorities including the police.

When legitimate interests apply

It is possible that from time to time the Instructor may wish to communicate with parents concerning other matters which may be of interest to them or where they may know of others who may have an interest. The nature of such contact will be:

- To inform parents of potential career opportunities with the Instructor;
- Providing news updates about developments at the Study Centre or within Kid Prodigy. This might for example be in relation to changes to the Kid Prodigy programme, information relating to it, educational meetings and 11+ meetings;
- To communicate about particular study opportunities and useful information about Kid Prodigy study, for example particular trials, promotions and campaigns.

Any communication under this heading will be of the nature referred to above. The Instructor will not communicate to you under this heading where there is any perceived detriment to you in receiving the communication.

If you do not wish to receive communications under this heading please contact the Instructor and let him or her know which type of communications you would not wish to receive.

When you consent

There are certain uses to which the Instructor will use personal information without your specific consent. Where such consent is required it will be sought separately. It is likely to be in areas such as in photographs of the children and using children's names and/or photographs in publicity material and/or publication of children's names in relation to results and award ceremonies.

If consent is given it can be withdrawn at any time by providing notification to the Instructor in writing or by email.

Other

Instructors may also use personal information for data management to enable the efficient running of our Study Centres.

9. What personal information may Kid Prodigy collect from you directly?

We have already indicated what information the Instructor may collect from you and provide to Kid Prodigy.

Sometimes early exchanges of information will be with Kid Prodigy rather than with the Instructor. This section deals with those and other circumstances.

In such circumstances Kid Prodigy is likely to require the following information about the student:

- Name;
- Address;
- Contact details;
- Date of birth;
- Schooling related information;
- Gender.
- Also, Kid Prodigy is likely to require the following information from parents/legal guardians:
 - Name;
 - Contact details;
 - Relationship to student;

Details of others who are authorised points of contact if primary contact is not available;
Any other information which may be provided, and which is relevant to the education of your children.

When undertaking visits to Study Centres Kid Prodigy may also require or obtain contextual information about students and/or their parents. This might, for example, relate to the student's lifestyle, interests and skills, be about the student's family including the structure of it and the occupation of the parent(s), any background issues that may be impacting upon the student's study and whether the student is a native English speaker.

10. Who will Kid Prodigy provide personal information to?

Kid Prodigy will provide the personal information referred to in the preceding paragraph to the Instructor for him or her to use for the purposes set out above.

On occasion, Kid Prodigy may process student data for statistical purposes and to assist it in refining and further developing (i) Instructor and employee training and (ii) the materials and instruction techniques. Kid Prodigy processes the data securely and in a statistical manner, and no personally identifiable data is retained any longer than 24 months after your child or children have ceased to attend a Study Centre without a legitimate reason to do so. We will ensure that appropriate technical and organisational measures are in place such that this data is shared with Kid Prodigy in a secure way. Furthermore, any international data transfers will be conducted in

accordance with the Standard Contractual Clauses (Data Transfer Agreement) between Kid Prodigy and agreed third party company.

A copy of the Standard Contractual Clauses (Data Transfer Agreement) is available upon request.

Kid Prodigy will not provide personal information for use by anyone else without your specific consent or unless this is necessary for health and safety reasons, to comply with child protection policies and procedures, or otherwise in relation to child welfare and child protection, for example in cooperating with local and public authorities to comply with legal requirements and those of regulators, for example Ofsted, or unless it is otherwise provided for in this Privacy Notice.

11. What about outsourcing by Kid Prodigy?

In the event that Kid Prodigy outsources certain functions (such as outsourcing certain IT development and maintenance activities), and where personal data is processed on Kid Prodigy's behalf, any transfers of data outside of the EEA shall be restricted to parties that Kid Prodigy has signed Standard Contractual Clauses (Data Transfer Agreements) with.

This is not for the other group companies to use on their behalf but rather to process information on Kid Prodigy's behalf. This will be for the efficient and effective administration and running of the business and provision of the study programme for example for IT needs including for the purposes of establishing, developing and maintaining relevant databases including the data collection system and customer relationship management, but also for purposes such as book-keeping and accounting, printing and training.

12. What will Kid Prodigy use personal information for?

The Instructor has day-to-day responsibility for the operation of the Study Centre and interaction with parents and students. However, there will be times when for one reason or another an Instructor is not able to undertake a task when Kid Prodigy may step in to aid and in so doing will make use of the personal information. Kid Prodigy will also use personal information to seek to refine and improve the effectiveness of the study programme and the student experience.

Kid Prodigy may therefore use personal information for the following purposes:

- to provide the course of study;
 - administer the course of study;
 - ensure the quality of the programmes;
 - to provide support to Instructors;
 - to respond to enquiries about the study offered;
 - to seek feedback about study experiences;
 - to address and communicate about operational issues such as the need to close a class suddenly, for example because of illness or bad weather or the need to address and make parents aware of changes to classes, for example new venues, dates and times;
 - to record and/or report upon the progress of the student;
 - to record and communicate other issues which may be impacting upon the progress of the student;
 - to notify of changes to the Centre, for example a change in Instructor;
 - providing continuity in the Study Centre, for example in the event of the Instructor no longer being available for one reason or another and whether on a temporary or permanent basis;
 - to respond to complaints.
- To ensure vital interests:
- This relates to the health and safety of a student. For example, if there was a medical emergency Kid Prodigy may need to provide relevant medical information about a student to the emergency services. Similarly, information may be provided to local or public authorities where welfare and child protection issues arise.

- To comply with Legal Duties

Kid Prodigy may in very rare circumstances be required by child welfare and child protection issues to provide information to local or public authorities including the police.

- When legitimate interests apply

This falls into two broad categories:

- Work undertaken in refining and improving the effectiveness of the study programme and improving the student experience; and
- Communicating news including news in relation to Kid Prodigy's operation, study and franchise opportunities.

The first category includes:

- Research and development purposes;
- Market research for establishing new Study Centres and/or helping existing Study Centres;
- Training of new and experienced Instructors and employees;
- Performance analysis;
- Support for students who wish to transfer between Centres.

Any processing of personal information under this category will be of the nature referred to above. Kid Prodigy will not process personal information under this category where there is any perceived detriment to you or your children in undertaking the processing.

Kid Prodigy may need to process some personal information of this nature for measurement and statistical purposes as referred to under the 'Other' heading but if you do not wish Kid Prodigy to process personal information for the above purposes please contact Kid Prodigy using the contact details set out in the Schedule.

The second category:

It is possible that from time to time Kid Prodigy may wish to communicate with parents concerning matters which may be of interest to them or where they may know of others who may have an interest. The nature of such contact will be:

- To inform parents of potential career opportunities with the Instructor;
- Providing news updates about developments at the Study Centre or within Kid Prodigy;
- To communicate about particular study opportunities and useful information about Kid Prodigy study, for example particular trials, promotions and campaigns;
- In relation to franchise or other career opportunities;
- Provision of information and consultation in relation to Study Centres which may be of relevance to your child or children.

Any communication under this category will be of the nature referred to above. Kid Prodigy will not communicate to you under this heading where there is any perceived detriment to you in receiving the communication.

If you do not wish Kid Prodigy to process personal information for the above purposes please contact Kid Prodigy using the contact details set out in the Schedule.

- When you consent

There are certain uses to which Kid Prodigy will not put personal information without your specific consent. Where such consent is requested it will be sought separately. It is likely to be in areas such as in photographs of the children and using children's names and/or photographs in publicity material and/or publication of children's names in relation to results and award ceremonies and using your children in case studies for training purposes.

If consent is given it can be withdrawn at any time by providing notification to Kid Prodigy in writing or by email.

- Other

We may also use personal information for measurement and statistical purposes.

13. What happens if I don't wish to provide personal information to the Instructor and Kid Prodigy?

The Instructor and Kid Prodigy require the personal information set out in this privacy notice in order to ensure that the Kid Prodigy programme can be safely and effectively delivered to your children and continually developed and improved for the benefit of your children. Without this information it will not be possible to deliver the services for the benefit of your children or at least not as well as we would like. We have though set out above some purposes for which either the Instructor or Kid Prodigy wish to use personal information under the heading of "Legitimate interests". If you do have an objection to any personal information being used under this heading you may object to either the Instructor, Kid Prodigy or both. If either the Instructor or Kid Prodigy wish to gather personal information for which consent is required, they will obtain that specific consent before gathering that information and you have the right not to provide such information.

14. How long will you keep personal information for?

The Instructor and Kid Prodigy will only retain personal information:

- For as long as necessary to fulfil the purposes it was collected for as set out in this Privacy Notice;
- In relation to those that enquire about the services which we can provide we would not normally keep that information for longer than 12 months after the last communication from the enquirer;
- Whilst your children are studying at the Study Centre it is necessary for us to retain the personal information. Thereafter we will not normally keep it for longer than 24 months after your children have ceased to attend a Study Centre unless we have legitimate reasons, including child protection reasons for doing otherwise;
- In some circumstances you have the right to request erasure of personal information held. This will be addressed below.

15. Data Subject Access Request (SAR)

Access –

You have a right to request copies of all personal data Kid Prodigy holds about you or your child/children. In the event you make a DSAR, Kid Prodigy will respond to you within one month of receipt of the request. Kid Prodigy may extend this period for a further two months, where necessary. Kid Prodigy shall notify you of any such extension. Where we receive your request in electronic form, your data shall be provided in electronic form (where possible), unless otherwise requested.

Correction –

it is important that you keep the Instructor up to date with any changes to the personal information provided. Subject to that you have the right to ask the Instructor or Kid Prodigy, as appropriate, to correct or complete any inaccurate or incomplete data held about you or your children. It is possible that evidence will be required of the new information provided.

Removal –

you are entitled to ask either the Instructor or Kid Prodigy to delete or remove personal information held where there is no good reason for the Instructor or Kid Prodigy to continue to hold it. It may not always be possible to comply with your request due to ongoing regulatory or legal obligations in relation to the personal information. However, where this is the case you will be informed and be told of the reasons why it is not possible to comply with the request.

Object to processing –

you may object to either the Instructor or Kid Prodigy processing personal information. There are some circumstances in which it will not be possible to comply with your request, for example if it is necessary to process the information in connection with obligations which the Instructor or Kid Prodigy (as appropriate) have and which have been explained to you in this document. If you object to either the Instructor or Kid Prodigy processing information which has been processed under the legitimate interest head, we will stop processing it.

Restriction of processing –

you may ask the Instructor or Kid Prodigy to suspend processing of personal information in the following situations:

If you want the data accuracy to be established;

Where the use of the personal information is unlawful, but you do not want it to be erased;

You need the data to be held even though the Instructor or Kid Prodigy (as appropriate) no longer require it as you need it to establish, exercise, or defend legal claims; or

You have objected to the use of the data by the Instructor or Kid Prodigy but the Instructor or Kid Prodigy (as appropriate) need time to determine whether they have overriding legitimate grounds to process it.

Request the transfer of information –

sometimes rights apply to request a transfer of personal information held to other organisations. This right only applies to personal information that is processed by automated means and is held because it was necessary for the performance of the contract with you or personal information which is processed based on consent.

16. Keeping personal information safe

The Instructor and Kid Prodigy have put in place appropriate security measures to prevent the personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to personal information is limited to those employees and contractors who have a business need to know the personal information and will only be processed upon instructions from either the Instructor or Kid Prodigy (as appropriate) and procedures had been put in place to deal with any suspected breach of the requirements under the GDPRs and you and/or the Regulator referred to below will be notified of any potentially significant breach.

17. What happens if you want to complain?

It is hoped that you will not have cause to complain. If you do complaints relating to the Instructor should be referred to the Instructor where possible and any complaints in relation to Kid Prodigy should be referred to the person named in the Schedule where possible. If it is not possible or appropriate to refer a complaint to the Instructor or Kid Prodigy it may be referred to the Regulator. This will vary depending upon whether you are based in the UK or Ireland. For the UK the contact details are:-

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

For more information contact www.ico.org.uk.

18. Miscellaneous

Neither the Instructor nor Kid Prodigy anticipate using automated decision making in relation to the personal information provided.

This Privacy Notice may be updated from time to time. The latest Privacy Notice will be displayed on Instructor and Kid Prodigy websites.

19. If I have any questions, who do I ask?

Please ask your Instructor or contact Kid Prodigy using the details in the Schedule.

Contact information

Abhay Marwaha
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