



PASSION EDUCATION LTD

Policy Name: Data Protection and GDPR Compliance

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Data Protection and GDPR Compliance

1. Introduction

Passion Education Ltd is committed to protecting the privacy and security of all personal data we process. As a provider of **100% live tuition**, we collect specific information to facilitate the **APEX Framework**. This policy outlines how we comply with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2. Data Collection and Usage

We collect only the information necessary to secure the student's academic journey. This includes:

- **Contact Information:** Names, email addresses, and phone numbers of parents and students to manage session links and invoicing.
- **Academic Data:** Diagnostic results from the **Admissions and Academic Trajectory Assessment**, homework submissions, and progress reports.
- **Visual and Audio Data:** Recordings of live sessions used for safeguarding, quality assurance, and student catch up.

3. Legal Basis for Processing

We process data under the following legal grounds:

- **Contractual Necessity:** To deliver the tuition services agreed upon during enrolment.
- **Legal Obligation:** To meet safeguarding and child protection requirements.
- **Legitimate Interests:** To monitor the effectiveness of the **Surgical Writing Labs** and ensure the high seniority of our educational standards.

4. Data Storage and Security

- **Encryption:** All digital data is stored on secure, encrypted servers with restricted access.
- **Retention:** Academic records are kept for the duration of the student's enrolment and for a prescribed period thereafter to support future references or exam board inquiries.
- **Third Parties:** We do not sell or lease personal data. Information is only shared with third party platforms (such as secure classroom providers) essential for the delivery of our **iGCSE bundles**.

5. Rights of the Data Subject

Parents and students have the following rights regarding their data:

- **The Right to Access:** You may request a copy of the personal information we hold about you.

- **The Right to Rectification:** You may request that we correct any inaccurate information.
- **The Right to Erasure:** You may request the deletion of data where it is no longer necessary for its original purpose or legal compliance.

6. Data Breaches

In the unlikely event of a data breach, Passion Education Ltd maintains a rigorous response plan. The **CEO** will notify the Information Commissioner's Office (ICO) and affected individuals within 72 hours where the breach is likely to result in a risk to the rights and freedoms of individuals.

7. Contact and Complaints

All inquiries regarding data protection should be directed to the **CEO**. If you remain unsatisfied with our response, you have the right to lodge a complaint with the ICO.