
Data Protection Policy

1. Purpose

Theorise Ltd is committed to protecting the privacy, confidentiality and security of personal information.

This policy explains how Theorise Ltd collects, uses, stores, shares and protects personal data in accordance with UK GDPR, the Data Protection Act 2018 and other applicable legislation.

Theorise Ltd recognises the importance of maintaining trust and confidence when handling personal information and is committed to ensuring that personal data is processed lawfully, fairly, securely and transparently.

2. Scope

This policy applies to all individuals who process personal data on behalf of Theorise Ltd, including:

- Directors
- Employees
- Support Staff
- Contractors
- Volunteers
- Temporary Workers
- Consultants
- Any other individual processing personal data on behalf of Theorise Ltd

The policy applies to all personal data processed by Theorise Ltd regardless of format, including electronic records, emails, paper records, databases, audio recordings and other information systems.

3. ICO Registration

Theorise Ltd is registered with the Information Commissioner's Office (ICO) as a Data Controller.

ICO Registration Number: ZA430867

4. Data Protection Responsibility

Overall responsibility for data protection compliance within Theorise Ltd rests with:

Dany Brunton

Director

dany@theorise ltd.com

The Data Protection Lead is responsible for overseeing compliance with this policy, responding to data protection requests and coordinating responses to personal data breaches.

5. Definitions

Personal Data

Any information relating to an identified or identifiable individual.

Examples include:

- Names
- Addresses
- Email addresses
- Telephone numbers
- Dates of birth
- Student reference numbers
- Staff records
- Employment information

Special Category Data

Personal data requiring additional protection, including information relating to:

- Health
- Disability
- Ethnicity
- Religious beliefs
- Sexual orientation
- Trade union membership
- Genetic or biometric data

Data Controller

An organisation that determines how and why personal data is processed.

Data Processor

An organisation or individual processing personal data on behalf of a Data Controller.

Personal Data Breach

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data.

6. Data Protection Principles

Theorise Ltd will process personal data in accordance with the principles set out within UK GDPR.

Personal data will be:

Lawful, Fair and Transparent

Processed lawfully, fairly and transparently.

Collected for Specific Purposes

Collected only for specified, explicit and legitimate purposes.

Adequate and Relevant

Limited to information necessary for the purpose for which it is processed.

Accurate

Kept accurate and, where necessary, up to date.

Retained Appropriately

Retained only for as long as necessary.

Secure

Protected through appropriate technical and organisational measures.

Accountable

Processed in a manner that demonstrates compliance with applicable legislation.

7. Lawful Processing

Theorise Ltd will only process personal data where a lawful basis exists.

Depending on the circumstances, processing may be necessary for:

- The performance of a contract
- Compliance with legal obligations
- Legitimate interests pursued by Theorise Ltd
- Protection of vital interests
- Performance of tasks carried out in the public interest
- Consent provided by the individual

Where special category data is processed, an additional lawful basis will be identified in accordance with UK GDPR requirements.

8. Personal Data Processed by Theorise Ltd

Theorise Ltd processes personal data relating to:

- Students
- Support Staff
- Applicants
- Employees
- Educational Institutions
- Funding Bodies
- Suppliers
- Clients
- Other Stakeholders

Information processed may include:

- Contact details
- Educational information
- Employment information
- Payment information
- Disability-related information
- Support requirements
- Correspondence and records
- Contractual information

Theorise Ltd will only process information necessary for legitimate business, contractual or legal purposes.

9. Student Information

Theorise Ltd provides educational support services and may process information relating to students in order to:

- Arrange and deliver support services
- Liaise with educational institutions
- Communicate with funding bodies
- Manage support provision
- Monitor service delivery
- Meet contractual obligations
- Comply with legal requirements

Where disability-related information or other special category data is processed, additional safeguards will be applied and access will be restricted to individuals with a legitimate need to know. Theorise Ltd recognises that information relating to disability, health conditions and support requirements is particularly sensitive and will ensure such information is handled with appropriate care and confidentiality.

10. Responsibilities

All individuals processing personal data on behalf of Theorise Ltd are responsible for:

- Complying with this policy
- Maintaining confidentiality
- Protecting personal information
- Using secure passwords and systems
- Reporting suspected breaches immediately
- Following company procedures relating to information security
- Ensuring information remains accurate and up to date
- Accessing only information necessary for their role

Managers and Directors are responsible for ensuring appropriate guidance, training and oversight are provided.

11. Sharing Information

Theorise Ltd may share personal data where there is a lawful basis for doing so.

Information may be shared with:

- Educational institutions
- Funding bodies
- Payroll providers
- Professional advisers
- Technology and software providers
- Regulatory authorities
- Law enforcement agencies
- Other organisations where legally required

Personal data will only be shared where appropriate safeguards are in place and where disclosure is necessary and proportionate. Personal information may also be disclosed without consent where required by law or where necessary to protect the safety, welfare or vital interests of an individual. This may include situations involving safeguarding concerns, risks of harm or other serious welfare issues.

12. Privacy Notices

Theorise Ltd will provide privacy information explaining:

- What information is collected
- Why it is collected
- How it will be used
- Who it may be shared with
- How long it will be retained
- Individual rights

Privacy information will be provided at the earliest appropriate opportunity.

13. Individual Rights

Individuals have a number of rights under UK GDPR.

These may include:

Right of Access

To request access to personal information held by Theorise Ltd.

Right to Rectification

To request correction of inaccurate or incomplete information.

Right to Erasure

To request deletion of personal information where appropriate.

Right to Restrict Processing

To request restrictions on how information is processed.

Right to Data Portability

To obtain information in a structured and commonly used format.

Right to Object

To object to certain forms of processing.

Rights Relating to Automated Decision Making

To challenge certain decisions made solely through automated processing.

Requests should be submitted to:

Dany Brunton

dany@theorise ltd.com

Theorise Ltd will normally respond within one month of receipt of a valid request.

14. Information Security

Theorise Ltd implements appropriate technical and organisational measures to protect personal data against accidental loss, destruction, misuse, unauthorised access or disclosure. Assignment Forms, student information and operational documentation may be stored within Theorise Ltd's secure online portal. Access is restricted to authorised users and staff are responsible for maintaining the confidentiality of their login credentials. Login details must never be shared with another individual.

Measures may include:

- Password protection
- Restricted system access
- Secure storage systems
- Encryption where appropriate
- Staff training
- Secure disposal of records
- Regular review of access permissions
- Cyber security controls

Email and Device Security

Individuals processing personal data on behalf of Theorise Ltd must:

- Use strong and secure passwords.
- Keep devices appropriately protected.
- Log out of systems when not in use.
- Avoid sharing login credentials.
- Take reasonable precautions when accessing information remotely.
- Ensure personal data is not accessible to unauthorised individuals.
- Report lost or stolen devices where personal data may be stored.
- Take care when sending emails containing personal information to ensure information is sent only to intended recipients.

All individuals are expected to follow information security requirements and report concerns promptly.

15. Personal Data Breaches

Any suspected loss, unauthorised disclosure, cyber incident or misuse of personal data must be reported immediately to Dany Brunton.

Theorise Ltd will investigate all reported breaches and take appropriate action to:

- Contain the breach
- Assess risks
- Mitigate harm
- Prevent recurrence

Where required by law, Theorise Ltd will notify:

- The Information Commissioner's Office (ICO)
- Affected individuals
- Relevant organisations

within the timescales prescribed by law.

16. Data Retention

Personal data will only be retained for as long as necessary to fulfil the purpose for which it was collected.

Retention periods will be determined by:

- Legal requirements
- Regulatory requirements
- Contractual obligations
- Operational needs

· Theorise Ltd's Data Retention Policy

Information no longer required will be securely deleted, destroyed or anonymised where appropriate.

17. Respect for Privacy

Theorise Ltd recognises the importance of respecting individual privacy and will process personal data in a manner consistent with applicable human rights and data protection legislation.

All processing activities will seek to balance legitimate organisational requirements with the rights and freedoms of individuals.

18. Complaints

Concerns regarding the handling of personal data should initially be raised with:

Dany Brunton

Director

dany@theorise ltd.com

Individuals also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Information Commissioner's Office:

Telephone: 0303 123 1113

Website: <https://ico.org.uk>

19. Policy Review

Item	Details
Policy Owner	Dany Brunton
Approved By	Director
Review Frequency	Annually

Item	Details
Version	3.0
Last Reviewed	26/05/2026
Next Review Date	26/05/2027

Appendix A – Lawful Bases for Processing Personal Data

The lawful bases for processing personal data under UK GDPR include:

1. Consent
2. Contract
3. Legal Obligation
4. Vital Interests
5. Public Task
6. Legitimate Interests

Where special category data is processed, Theorise Ltd will identify and document the additional lawful condition relied upon before processing takes place.