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# Student Privacy Notice

## 1. Introduction

Theorise Ltd is committed to protecting your privacy and handling your personal information fairly, lawfully and transparently.

This Privacy Notice explains:

- What information we collect about you.
- How we use your information.
- Why we process your information.
- Who we may share information with.
- How long we keep information.
- Your rights under data protection legislation.

This notice applies to students who receive, have received or are being considered for support services provided by Theorise Ltd.

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## 2. Who We Are

Theorise Ltd provides specialist educational support services to students studying within colleges and universities throughout the United Kingdom.

Our services may include:

- Study Skills Support
- Mental Health Mentoring
- Autism Mentoring
- Note-Taking Support
- Proof-Reading Support

- In-Class Support
- Personal Assistance
- Examination Support

For the purposes of data protection legislation, Theorise Ltd may act as a Data Controller, Joint Controller or Data Processor depending upon the nature of the information being processed and the arrangements in place with your college, university or funding body.

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### 3. Contact Details

If you have any questions regarding this Privacy Notice or how your information is handled, please contact:

**Dany Brunton**

Director and Data Protection Lead

Email: [dany@theoriseLtd.com](mailto:dany@theoriseLtd.com)

Telephone: 07725 986185

Theorise Ltd  
Westpoint  
4 Redheughs Rigg  
Edinburgh  
EH12 9DQ

ICO Registration Number: **ZA430867**

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### 4. Information We Collect

The information we collect will vary depending on the support being provided but may include:

**Personal Information**

- Name
- Address
- Telephone number
- Email address

- Date of birth
- Student identification numbers
- Course and institution details

### **Support Information**

- Funding authority reference numbers
- Support recommendations
- Assignment information
- Support schedules
- Attendance information
- Communication records
- Support records

### **Special Category Information**

Where necessary to provide support services, we may process information relating to:

- Disability
- Health conditions
- Mental health conditions
- Specific learning difficulties
- Other information relevant to support provision

This information receives additional protection under UK GDPR.

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## **5. How We Obtain Information**

Information may be obtained from:

- You directly
- Your college or university

- Funding bodies
- Needs Assessors
- Disability or Inclusion Services
- Other authorised organisations involved in arranging your support

Where information is obtained from third parties, this will only occur where there is an appropriate legal basis for doing so.

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## **6. How We Use Your Information**

We use your information to:

- Arrange support services
- Allocate appropriate support workers
- Communicate with you
- Liaise with colleges and universities
- Liaise with funding bodies
- Manage support provision
- Monitor service delivery
- Respond to enquiries
- Manage complaints and concerns
- Fulfil contractual obligations
- Meet legal and regulatory requirements
- Maintain accurate records

We will only use information where there is a lawful basis for doing so.

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## **7. Lawful Basis for Processing**

The lawful bases relied upon may include:

Contract

Processing necessary to provide support services and fulfil contractual obligations.

Legal Obligation

Processing required to comply with legal, regulatory or audit requirements.

Legitimate Interests

Processing necessary to operate and improve our services provided that your rights and interests are not overridden.

Consent

Where consent is required for specific processing activities.

Where special category data is processed, we will identify an additional lawful condition under UK GDPR before processing takes place.

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## **8. Who We Share Information With**

Where necessary and appropriate, information may be shared with:

Colleges and Universities

To arrange, monitor and review support provision.

Funding Bodies

Including:

- SAAS
- Student Finance England
- Student Finance Wales
- Student Finance Northern Ireland
- Other relevant funding organisations

Where necessary to verify funding arrangements and support provision.

Allocated Support Staff

Information necessary for the delivery of your support may be shared with your allocated support worker(s).

Service Providers

Including providers of secure software systems used to manage support services and records.

Regulatory Authorities

Where required by law or regulatory obligation.

Information will only be shared where there is a legitimate reason and appropriate safeguards are in place.

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## **9. Safeguarding and Welfare Concerns**

In certain circumstances, information may be shared without consent where necessary:

- To protect an individual from harm.
- To fulfil safeguarding responsibilities.
- To comply with legal obligations.
- To protect vital interests.

Where appropriate, information may be shared with educational institutions, emergency services, safeguarding agencies or other relevant organisations.

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## **10. International Transfers**

Theorise Ltd primarily stores and processes information within the United Kingdom.

Where personal data is transferred outside the United Kingdom, appropriate safeguards will be implemented in accordance with UK GDPR requirements.

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## 11. How Long We Keep Information

Theorise Ltd retains information only for as long as necessary for operational, contractual, legal, safeguarding and audit purposes.

Retention periods are determined in accordance with Theorise Ltd's Data Retention Policy.

Examples include:

Record Type	Typical Retention Period
Student Support Funding Documentation	5 years
Student Contact Information	5 years
Student Support Records	5 years
Student Correspondence	5 years
Complaints Records	6 years
Safeguarding Records	Minimum 6 years

Retention periods may be extended where required for legal proceedings, regulatory investigations, safeguarding concerns or audit requirements.

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## 12. Your Rights

Under UK GDPR, you may have the right to:

- Be informed about how your information is used.
- Request access to your personal data.
- Request correction of inaccurate information.
- Request deletion of information in certain circumstances.
- Request restriction of processing.
- Object to certain processing activities.
- Request transfer of information in certain circumstances.

- Withdraw consent where consent is relied upon.
- Challenge certain automated decision-making processes.

Not all rights apply in every circumstance and some may be subject to legal exemptions.

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### **13. Making a Request**

Requests relating to your personal information should be submitted to:

**Dany Brunton**

Director and Data Protection Lead

Email: [dany@theorise ltd.com](mailto:dany@theorise ltd.com)

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

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### **14. Complaints**

If you have concerns regarding how your information has been handled, please contact:

**Dany Brunton**

Director and Data Protection Lead

Email: [dany@theorise ltd.com](mailto:dany@theorise ltd.com)

Telephone: 07725 986185

We will seek to resolve concerns promptly and fairly.

You also have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office

Telephone: 0303 123 1113

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

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### **15. Policy Review**

Item	Details
Policy Owner	Dany Brunton
Approved By	Director
Version	Version 2.0
Last Reviewed	26/05/2026
Next Review Date	26/05/2027
Review Frequency	Annually