PRIVACY POLICY

Last updated on 01 July 2023

This Privacy Notice for Bespoke Tutors UK Ltd., ('we', 'us' or 'our'), describes how and why we might collect, store, use and / or share ('process') when you use our services ('Services') such as when you:

- Visit our website at http://www.bespoke-tutors.com, or any website of ours that links to this privacy notice.
- Engage with us in other related ways, including any sales, marketing or events.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If, after reading this privacy notice, you still have any questions or concerns, please contact us at bespoketutorsuk@gmail.com.

Summary of Key Points

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our <u>table of contents</u> below to find the section you are looking for.

What personal information do we process? When you visit, use or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make and the products and features you use. <u>Learn more about personal information you disclose to us.</u>

Do we process any sensitive personal information? We may process sensitive personal information where necessary with your consent or as otherwise permitted by applicable law. Learn more about sensitive information we process.

Do we receive any information from third parties? We do not receive any information from third parties.

How do we process your information? We process your information to provide, improve and administer our Services, communicate with you for security and fraud protection, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have valid legal reason to do so. <u>Learn more about how we process your information</u>.

In what situations, and with which parties, do we share personal information? We may share information in specific situations and with specific third parties. <u>Learn more about</u> when and with whom we share your personal information.

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be

100% secure, so we cannot promise or guarantee that hackers, cyber criminals or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal or modify your information. <u>Learn more about how we keep your information safe.</u>

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. <u>Learn more about your privacy rights.</u>

How do you exercise your rights? The easiest way to exercise your rights is by visiting https://bespoke-tutors.com/contact-us, or by contacting us directly. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about any information we collect? Review the privacy policy in full.

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1. What information do we collect?

Personal information you disclose to us.

In short: we collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register for our Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal information provided to us. The personal information that we collect depends on the context of your interactions with us and our Services, the choices you make and the products and features you use. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses

Home addresses

Sensitive information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Student data
- Health data

All information you provide to us must be true, complete and accurate and you must notify us of any changes to such personal information.

Information automatically collected

In short: some information - such as your Internet Protocol (IP) address and/or browser or device characteristics - is collected automatically when you visit our Services on our Site.

We automatically collect certain information when you visit, navigate or use the Services. The information does not reveal your specific identity (like your name or contact information) but may include device and usage information such as your IP address, browser and device characteristics, operating system, language preferences, referring URL's, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

Log and Usage Data: Log and usage data service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity with our Services (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

2. How do we process your information?

In short: We process your personal information to provide, improve and administer our Services, communicate with you for security and fraud prevention, and to comply with the Law. We may also process your information for other purposes, with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To provide a facilitator for delivery of services. We may process and share your information to provide you with the requested service.
- To respond to user enquiries / offer support to users. We may process your information to respond to enquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies and other similar information.
- To save and protect an individual's vital interest. We may process and share your information when necessary with relevant authorities to save or protect an individual's vital interest, such as to prevent harm.

3. What Legal Bases do we rely on to process your information?

In short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your information. As such, we may rely on the following legal bases to process your personal information.

- Consent. We may process your information if you have given us permission (i.e consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- Performance of a contract. We only process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services at your request prior to entering into a contract with you.
- Legal Obligations. We may process your personal information where we believe it is necessary to comply with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- Vital interests. We may process your personal information where we believe it is necessary to protect your vital interests or the vital interest of a third party, such as situations involving potential threats to the safety of any person.#

4. When and with whom do we share your personal information?

In short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your information in the following situations:

- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.
- Freelance Workers: We may share or transfer specific personal information relating to you to specific parties in order to provide the Service.
- Authorities: We may share or transfer your information to third parties including Social Care and the Police where the Client, or any relative, is at risk of harm.

5. Do we use cookies and other tracking technologies?

In short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

6. How long do we keep your information?

In short: We keep your information for as long as necessary to fulfil the purpose outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, data relating to minors, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us or use our Services.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information or, if this is not possible, we will store your information securely and isolated away from any further processing until deletion is possible.

7. How do we keep your information safe?

In short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your personal information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cyber criminals or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

8. Do we collect information from minors?

In short: We do not knowingly collect data from, or market to, children under the age of 18 years of age without parental consent.

We do not knowingly solicit data from, or market to, children under the age of 18 years of age. By using our Services, you represent that you are at least 18 years of age or you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected without parental consent, we will deactivate any online account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18 without parental consent, please contact us at bespoketutorsuk@:gmail.com as soon as possible.

9. What are your privacy rights?

In short: In some regions, such as the European Economic Area (EEA) and United Kingdom (UK) you have rights that allow you greater access to and control over your personal information. You may review, change or terminate your account at any time.

In some regions, like the European Economic Area (EEA) and United Kingdom (UK) you have certain rights under applicable data protection laws. These may include the right:

- i) to request access and obtain a copy of your personal information
- ii) to request rectification or erasure
- iii) to restrict the processing of your personal information and if applicable,
- iv) to date portability

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'How can you contact us about this notice?' below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

If you live outside of the above mentioned, please refer to your own country's data protection laws for further information.

Withdrawing your consent. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'How can you contact us about this notice?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds, other than consent.

Opting out of marketing and promotional communications. You can unsubscribe from our marketing and promotional communication at any time by replying 'STOP' or 'UNSUBSCRIBE' to the SMS or email that we send, or by contacting us using the details provided in the section 'How can you contact us about this notice?' below. You will then be removed from the marketing list. However, we may still communicate with you - for example to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests or other, non-marketing purposes.

Account information.

If you would at any time like to review or change the information we hold, or terminate your account with us, you can contact us using the details provided in the section 'How can you contact us about this notice?' below.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any legal investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. This could affect certain features of our Services.

If you have questions or comments about your privacy rights, you may email us at bespoketutorsuk@gmail.com.

10. Controls for 'Do Not Track' features.

Most web browsers and some operating systems and mobile applications include a DO NOT TRACK ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. Do we make changes to this notice?

In short: Yes, we will update this notice as necessary to remain compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We

encourage you to review this privacy notice frequently to stay informed of how we are protecting your information.

12. How can you contact us about this notice?

If you have any questions or comments about this notice, you may contact our Data Protection Officer ('DPO'), Kate Marshall, by email at bespoketutorsuk@gmail.com, by phone on 07488 386703, or contact us by post at:

Bespoke Tutors UK Ltd. 67 King Street Maldon Essex CM9 5DX

13. How can you review, update or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update or delete your personal information, please visit: https://bespoke-tutors.com/contact-us.