EDUCATION REVOLUTION: GDPR POLICY

This policy was last updated on 23rd November 2024

1. **Introduction**
Education Revolution UK ("we," "us," or "our") is committed to protecting the privacy and security of the personal data we process. This General Data Protection Regulation (GDPR) policy outlines how we comply with GDPR and the Data Protection Act 2018, applicable in England, in relation to the collection, use, and storage of personal data.

This policy applies to all personal data we collect and process in connection with our business activities, including from clients, sub-contracted tutors, suppliers, and other stakeholders.

2. **Data Protection Principles**
We adhere to the following core data protection principles under GDPR:

- Lawfulness, Fairness, and Transparency: We process personal data lawfully, fairly, and in a transparent manner.

- Purpose Limitation: We collect personal data for specified, explicit, and legitimate purposes and do not process it for incompatible purposes.

- Data Minimisation: We ensure that personal data we process is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

- Accuracy: We take reasonable steps to ensure the personal data we process is accurate and, where necessary, kept up to date.

- Storage Limitation: We retain personal data only for as long as is necessary for the purposes for which it was collected or as required by law.

- Integrity and Confidentiality: We process personal data securely to protect it from unauthorised or unlawful processing and accidental loss, destruction, or damage.

- Accountability: We are responsible for complying with these principles and can demonstrate compliance with our GDPR obligations.

3. **Data Collection and Processing**
(1) Lawful Basis for Processing

We process personal data only when we have a lawful basis to do so, including:
- Consent: Where the individual has provided clear consent for processing their personal data for a specific purpose.

- Contract: Processing is necessary to perform a contract or take steps at the request of the individual prior to entering into a contract.

- Legal Obligation: Processing is necessary for compliance with a legal obligation.
- Legitimate Interests: Processing is necessary for our legitimate business interests, provided those interests are not overridden by the individual's rights and freedoms.

(2) Types of Personal Data We Collect

We may collect and process the following types of personal data:

- Personal Identification Information: Name, address, phone number, email address, etc.

- Financial Information: Bank account details, payment card details, etc.

- Employment Information: Job title, employment history, and other details as necessary for employment purposes.

- Usage Data: Information about how individuals use our website, services, or products (see also our website privacy policy)

4. **Individual Rights**

Under the GDPR, individuals have the following rights in relation to their personal data:

- Right to Access: Individuals have the right to request access to their personal data and obtain a copy of the data we hold about them.

- Right to Rectification: Individuals have the right to request that we correct any inaccurate or incomplete personal data.

- Right to Erasure: Individuals have the right to request that we delete their personal data, subject to certain conditions.

- Right to Restrict Processing: Individuals can request that we limit the processing of their personal data under certain circumstances.

- Right to Data Portability: Individuals have the right to receive their personal data in a structured, commonly used format and request the transfer of the data to another controller.

- Right to Object: Individuals have the right to object to the processing of their personal data in certain circumstances, including where we rely on legitimate interests.

- Right to Withdraw Consent: Where consent is the basis for processing, individuals have the right to withdraw their consent at any time.

Requests to exercise any of these rights can be made by contacting us at the contact information provided below.

5. **Data Sharing and Disclosure**

We may share personal data with third parties where necessary for the performance of our services or for compliance with legal obligations. This may include:

- Service providers, such as IT and cloud service providers.
- Government authorities and regulators, as required by law.
- Third parties in the event of a business transaction, such as mergers, acquisitions, or asset sales.

We ensure that all third parties who process personal data on our behalf are compliant with GDPR and have appropriate data protection measures in place.

6. **Data Security**

We implement appropriate technical and organisational measures to protect personal data from unauthorised access, misuse, alteration, or destruction. These measures include:

- Encryption of personal data.
- Access control measures to restrict who can access personal data e.g. the use of password protected files.
- Regular audits and monitoring of our data processing practices.
- Security training for employees or contractors.

7. **Data Retention**

We retain personal data only for as long as necessary for the purposes for which it was collected, in accordance with legal, regulatory, and business requirements. Once the retention period expires, personal data will be securely deleted or anonymised.

8. **Data Breach Response**

In the event of a data breach, we will promptly assess the risk to individuals' rights and freedoms and, where necessary, notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach. If the breach poses a high risk to the affected individuals, we will also inform them without undue delay.

9. **Updates to This Policy**

We may update this GDPR policy from time to time to reflect changes in our practices or legal requirements. Any changes will be posted on our website and, where appropriate, notified to individuals by email or other means.

10. **Contact Information**

If you have any questions about this policy or our data protection practices, or if you wish to exercise your rights under GDPR, please contact sarah@educationrevolution.co.uk