

# Privacy Policy

**Effective Date: 12 January 2026**

## Introduction

Miss Sarah collaborates with organisations involved in delivering career information, advice, and guidance, as well as education consultancy and training services. In partnership, these organisations, working alongside Miss Sarah, process and share personal data regarding both prospective and current students and employees. Our commitment is to safeguard the privacy of your personal information, emphasising transparency in the collection and use of personal data. This dedication aligns with our broader commitment to protecting individuals' privacy and ensuring compliance with GDPR and other applicable data protection laws across the UK, Europe, and South East Asia. The policy delineates our comprehensive approach to data protection and the measures implemented to guarantee GDPR compliance.

## Scope

This policy applies to all employees, contractors, and third-party service providers working on behalf of Miss Sarah, both inside and outside the UK, Europe, and South East Asia.

## Data Protection Officer (DPO)

Miss Sarah has appointed a Data Protection Officer responsible for overseeing compliance with data protection laws. The DPO can be contacted at [miss.sarah.tuition@gmail.com](mailto:miss.sarah.tuition@gmail.com).

## Why we collect your data:

Miss Sarah collaborates with organisations, including education consultancies, tutorial centres, and other education and training entities in Southeast Asia, the UK, and beyond. Our outreach activities aim to support young people, including neurodiverse individuals, through bespoke guidance, mentoring, and residential. We actively engage in widening participation efforts, aligning with the UK government's policy to broaden access to higher education, and in our endeavour to support the economy by helping to align individuals with labour market needs. The data we collect is utilised to deliver, monitor, and evaluate our activities, focusing on tracking the progression of participating students. This analysis investigates the impact of Miss Sarah initiatives on attainment, progression, social mobility, learner outcomes, and eventual employment – all considered to be "in the public interest".

Our commitment to this work reflects our dedication to being an active participant in the global community, fostering informed choices for young people as they navigate progression to secondary school, sixth form, college, higher education or employment.

## Data Protection Principles

There are certain laws – Data Protection Act 2018 – that mean we must ensure your personal data is:

- Accurate
- Collected and used in ways that have been clearly explained to you
- Stored in secure locations
- Stored only for the period necessary to fulfil the purpose we have told you about.

## International Data Transfers

In cases where personal data is transferred outside the European Economic Area (EEA) and the UK, Miss Sarah will ensure that appropriate safeguards are in place, such as Standard Contractual Clauses, Binding Corporate Rules, or other mechanisms recognised by the GDPR.

## We collect your details for the following reasons:

- To plan for and deliver activities that have been designed to support decision making in education, training and employment. Miss Sarah activities may include (but are not limited to):
  - tutor-led tuition and guidance
  - workshops and activities that are organised in collaboration with educational establishments and organisations who support entry to educational institutions – such as educational agencies and tutorial centres
  - workshops and other events, including digital events
  - Residential activities
  - to better understand your needs and inform improvements to our activity
  - to assess participant eligibility for specific activities
  - to communicate with you about the activities you have engaged with
  - to monitor participation in activities
  - to evaluate our activities
  - to be able to identify whether or not you would benefit from specialist support
  - to track your progression into and through the phases of compulsory and voluntary education
  - to send you further information – for example through messenger or email – about activities and advice and guidance, should you have opted to receive it.

At no time is your personal information passed to organisations outside of Miss Sarah for marketing or sales purposes. However, we may contact you about events or support which assist your progression aims, and may liaise with others within our network about any future activities you undertake. We may also contact you with opportunities to participate in relevant research projects.

### **What information is collected?**

For all activities, where possible, we will collect your:

Name

Date of Birth

Address

Name of current school/college/university (if applicable)

Name of previous school/college/university (if applicable)

Contact information e.g. an email address

We may also collect special category data such as that outlined below to either assess eligibility for specific activities/support and/or for equal opportunity and monitoring evaluation.

### **Data may include learners' gender, ethnicity and whether learners:**

- Are/have been in local authority care
- Are young carers
- Have an education, health and care plan (EHCP)
- Are estranged from parents
- Have a disability and/or medical condition
- In receipt of or eligible for free school meals (UK)
- In receipt of a Personal Independent Payment (PIP) (UK)
- In receipt of or eligible for a 16-19 bursary (UK)
- In receipt of or eligible for means tested benefits
- Are British Nationals or have British National Overseas status
- Are Asylum seekers or have refugee status
- Parents/carers who are in receipt of means tested benefits
- Parents/carers have completed a Higher Education qualification



### **Why we collect your parent/carer details:**

If you are applying to, enrolling on, one of our programmes, we will collect contact details of your parents/carers for the purpose of ensuring your safety and welfare, as well as communicating your progress (where applicable).

Miss Sarah will only process personal data when there is a lawful basis for doing so, such as the necessity for the performance of a contract, compliance with a legal obligation, protection of vital interests, consent, the performance of a task carried out in the public interest or the exercise of official authority, and legitimate interests pursued by Miss Sarah or a third party.

Miss Sarah will collect and process only the personal data that is necessary for the purposes for which it was collected. We will not use personal data for any purposes incompatible with the original purpose of collection.

### **How we store your data:**

Miss Sarah has implemented appropriate technical and organisational measures to ensure the security and confidentiality of personal data. This includes encryption, access controls, regular security assessments, and employee training.

Miss Sarah limits the use of paper-based information, however, where paper records are created, they are digitised and uploaded to secure, password protected storage services, including secure databases - Study Hub (courses) and Agentcis (Customer Relationship Management System) or within Miss Sarah secure, password protected storage services (SharePoint).

For the purposes of administration, planning and management of activities we utilise the following methods/platforms:

- Microsoft Office Suite
- Google G Suite
- Microsoft SharePoint
- Thinkific
- Brillium
- Agentcis
- Eventbrite
- Indigo Pro
- Morrisby
- Team Focus Profiling
- eCLIPS
- Twinkl
- Oxford Owl
- Vocabulary.com

## Miss Sarah Activity

We keep your personal information for the duration that you are enrolled on a Miss Sarah activity and for two years after. After such time, your data will either be securely deleted/destroyed or anonymised so that you cannot be personally identified and held indefinitely for reporting purposes

## Data Breach Notification

In the event of a data breach that is likely to result in a risk to the rights and freedoms of individuals, Miss Sarah will notify the relevant supervisory authorities and affected data subjects without undue delay, as required by the GDPR.

## Data Protection Impact Assessments (DPIAs)

Miss Sarah will conduct DPIAs for processing activities that are likely to result in a high risk to the rights and freedoms of individuals. The results of DPIAs will be used to mitigate risks and ensure compliance with data protection principles.



## **Accountability**

Miss Sarah is committed to demonstrating compliance with the GDPR and takes responsibility for the processing of personal data. Regular reviews of data protection measures will be conducted to ensure ongoing compliance.

## **Miss Sarah Subscriptions**

If you have subscribed to receive information, we will keep your data for as long as we produce the information you have subscribed to. Your data will only be used for the purposes you have agreed to. You are able to unsubscribe from any subscription at any point.

## **Who has access to your data:**

Miss Sarah's team for reasons outlined above (see the section "why we collect your data").

If you make an application to a school, college or university, your data may be shared with the Admissions Department at the respective institution.

Third parties and partners where there is a legitimate reason, for example, your education agent or third-party consultant.



### **How you can access your data:**

Miss Sarah acknowledges and respects the rights of data subjects as outlined in the GDPR. Individuals have the right to access, rectify, erase, restrict processing, object to processing, and data portability.

With regards to your data, you have the right to:

Request a copy of your personal data we hold about you

Request to update your personal data

Request that we delete your personal data

Object to the processing of your personal data and/or request that we stop using your personal data.

If you would like to action any of the above, please contact

[miss.sarah.tuition@gmail.com](mailto:miss.sarah.tuition@gmail.com)

### **Complaints:**

If you are unsatisfied with the way we have processed your personal data, or have any questions or concerns about your data please contact [miss.sarah.tuition@gmail.com](mailto:miss.sarah.tuition@gmail.com) If we are not able to resolve the issues to your satisfaction, you have the right to apply to the Information Commissioner's Office (ICO) in the UK. They can be contacted at <https://ico.org.uk>

### **Changes to this notice:**

We keep our privacy notices under regular review. This privacy notice was last updated in January 2024.

### **Other Privacy Notices:**

We do our utmost to protect your privacy. Please be aware that other privacy notices exist in respect of data held, including but not limited, to activities in relation to enquiries, applications, current students, alumni and use of our platforms.