

Telios Tutors Limited (“we”, “our”, “us” or “TTL”) is committed to protecting the privacy of all users of our website telios tutors.com, or mobile applications (together, the “Sites”). Please read the following privacy policy that explains how we use and protect your information. “data controller” of the information you provide to us.

1. CONTACT DETAILS

If you have any queries or requests concerning this privacy policy or how we handle your data more generally, please get in touch with us using the following details.

By contacting admin@telios tutors.com

2. HOW WE COLLECT YOUR INFORMATION

We collect your personal information when you interact with us or use our services, such as when you use our Sites to make a request. We also look at how visitors use our Sites, to help us improve our services and optimise customer experience.

We collect information:

- when you submit a contact form either on our website or our via our marketing channels
- when you contact us directly via email, phone, post, message or via our chat function;

3. INFORMATION THAT WE COLLECT FROM YOU

When you visit the Sites or submit a form through the Sites, you are asked to provide information about yourself including your name, contact details, institution of study, year of study, subject, exam board or module outline, date of exam or coursework deadline, goal of tuition, academic and non academic interests, when you would like to start, days and times that are most suitable for lessons, how regularly you would like tuition, full home address and how you found out about us.

We also collect information about your usage of the Sites and information about you from when you contact us or provide us with feedback, including via e-mail, letter or phone. If you contact us by phone, we make notes in relation to your call.

We collect payment information such as credit card, debit card or direct debit information when you have agreed to pursue tuition via TTL. We either take these details over the phone or send you a ‘payment request’ via email.

4. USE OF YOUR INFORMATION

We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law. We will have a lawful basis for processing your information: if we need to process your information in order to provide you with the service you have requested; we have your consent; we have a justifiable reason for processing your data.

Where we need to in order to provide you with the service you have requested, we use your information:

- to supply the services you have requested;
- to enable us to collect payment from you; and
- to contact you where necessary concerning our services.

4. RETENTION OF YOUR INFORMATION

We will not retain your information for any longer than we think is necessary.

Information that we collect will be retained for as long as needed to fulfil the purposes outlined in the 'Use of my information' section above, in line with our legitimate interest or for a period specifically required by applicable regulations or laws, such as retaining the information for regulatory reporting purposes. When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

7. DISCLOSURE OF YOUR INFORMATION

The information we collect about you will be transferred to and stored on our servers. We are very careful about who else your information is shared with.

We share your information with third party service providers. The types of third party service providers whom we share your information with includes:

- Payment providers (including online payment providers and fraud detection providers): for the purposes of providing services to us, for example when they process information such as credit card payments for us, provide support services to you or carry out fraud checks for us. (<https://www.stripe.com/gb>)
- IT service providers for the purposes of data storage and analysis (<https://secure.tutorcruncher.com/>)

TTL will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy when it is transferred to third parties.

If our business enters into a joint venture with, purchases or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, our new business partners or owners or their advisors.

We may also share your information:

- if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation or regulatory requirement. This includes exchanging information with other companies and other organisations for the purposes of fraud protection and prevention;
- in order to enforce our agreement with you;
- to protect the rights of TTL, including to prevent fraud; and
- with such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police.

8. SECURITY

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected.

We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9. YOUR RIGHTS

Under data protection law, you may have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact us using the contact details set out above. For additional information on your rights please contact your data protection authority and see below.

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this policy.

The right of access. You have the right to obtain access to your information (if we're processing it). This will enable you, for example, to check that we're using your information in accordance with data protection law. If you wish to access the information we hold about you in this way, please get in touch (see Contact Details). **The right to rectification.** You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us (see Contact Details).

The right to erasure. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you by contacting us (see Contact Details).

The right to restrict processing. You have rights to 'block' or 'suppress' further use of your information. When processing is restricted, we can still store your information, but will not use it further. **The right to data portability.** You have the right to obtain your personal information in an accessible and transferrable format so that you can re-use it for your own purposes across different service providers. This is not a general right however and there are exceptions. To learn more please get in touch (see Contact Details).

The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority.

The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. You can do this by contacting us (see Contact Details). Withdrawing consent will not however make unlawful our use of your information while consent had been apparent.

The right to object to processing. You have the right to object to certain types of processing, including processing for direct marketing and profiling. You can object by

changing your marketing preferences or disabling cookies as set out in sections 7 and 8 above.

10. CHANGES TO OUR PRIVACY POLICY

Any changes to our privacy policy will be posted to the Sites and, where appropriate, we will notify you of the changes for example by email or push notification.

This privacy policy was last updated: 10/05/2021

11. COMPLAINTS

If you're not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO).