



WESTMINSTER TUTORS PRIVACY NOTICE FOR PARENTS

1 INTRODUCTION

- 1.1 We are committed to protecting and respecting your and your student's privacy. David Game College Group Ltd. is a group of independent colleges including Westminster Tutors. In this privacy notice, references to "**we**", "**us**", "**our**", "**Westminster Tutors**" or "**David Game Group Ltd**" is a reference to David Game Group Limited and the college which your student is attending, may be attending or has attended.
- 1.2 This privacy notice sets out the basis on which any personal data we collect from you or your student, or that you provide to us, is handled by us. We also have a privacy policy for our students, this is available on our website.
- 1.3 Please read the following carefully to understand our views and practices regarding your and your student's personal data and how we will treat it.
- 1.4 For the purposes of the General Data Protection Regulation 2016/679 ("**GDPR**"), we are the data controller and our head office is at 843 Finchley Road, London, NW11 8NA. Our ICO registration number is ZA804163. As data controller we are responsible for deciding how we hold and use personal information about you.
- 1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

2 INFORMATION WE COLLECT ABOUT YOU AND YOUR STUDENT

Information you give us

- 2.1 You may give us personal data about you or your student, in a number of ways; these include:
- 2.1.1 using, visiting or interacting with our website (such as filling out forms or registering on our website);
 - 2.1.2 visiting our college;
 - 2.1.3 corresponding with us by phone, e-mail or post; and
 - 2.1.4 sending information directly to us, for example when paying our fees, giving us medical records or information about your student's health, completing college admission forms, signing our parent contract or providing information as requested by us and/or which is necessary from time to time.
- 2.2 The information you give us may include the following information about you and / or your student:
- 2.2.1 full name;
 - 2.2.2 date of birth and year group;

- 2.2.3 contact details (including home address, e-mail address, and mobile, home and/or work phone number);
- 2.2.4 parent login information (i.e. username and password) for the website;
- 2.2.5 financial and credit card information;
- 2.2.6 photograph;
- 2.2.7 passport details, nationality and other information relating to immigration status;
- 2.2.8 education and health records (including special education needs, medical or physical conditions and/or accidents);
- 2.2.9 previous educational records and achievements;
- 2.2.10 (where appropriate) family circumstances (including your relation to the student and your marital status); and
- 2.2.11 race, religion and ethnicity.

Technical information we collect about you when you visit our website

- 2.3 With regard to each of your visits to our website we may automatically collect the following information:
 - 2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - 2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
- 2.4 Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Information we receive from other sources

- 2.5 We may be working closely with third parties (including, for example, your student's previous or new college(s), medical practitioners, photographers, local authorities, education authorities, business partners, payment and delivery services, debt collectors, lawyers and credit reference agencies) and may receive information about you from them.
- 2.6 We may also use CCTV footage to ensure the college is safe. We may receive information about you if you use any of the other websites we operate or the other services we provide.

3 COOKIES

- 3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy which is made available on our website.

4 CONTACT US

- 4.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Officer, Sean Doherty, Principal, Westminster Tutors, sean@westminstertutors.co.uk.

5 USES MADE OF THE INFORMATION

Information you give to us

- 5.1 We will use the information you give to us to pursue the following legitimate interests:
- 5.1.1 to deliver educational services to your student;
 - 5.1.2 to protect the welfare of your student, promote the objects and interest of our colleges, ensure the most efficient management of the colleges and ensure that the colleges' legal obligations are adhered to;
 - 5.1.3 to store this information on the college's chosen management information system;
 - 5.1.4 to use your student's photograph as part of a manual ID system on the college management information system;
 - 5.1.5 to use your student's photograph internally within the college for display in college halls or classrooms;
 - 5.1.6 to manage any queries or disputes you or your student may have with us or that we have with you or your student;
 - 5.1.7 to enforce our terms of use with you or any other contract we may have with you (including the parent contract);
 - 5.1.8 where your student is attending one of our colleges, to provide you with information about other similar services (for example, after college clubs or open days) we offer as part of the education and overall development of your student at the college;
 - 5.1.9 once your student has left the college, to keep you up to date with key college news and upcoming events; and
 - 5.1.10 to send out surveys to you by email as part of our Voice of the Parent campaign which is our college improvement tool.
- 5.2 In order to pursue the legitimate interests referred to in paragraphs 5.1.1 and 5.1.3, our colleges also rely on software applications and other technology to process personal data about you and your student. These include the college's management information system, virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text

and email messaging communications, assessments of students' progress, our group-wide billing system and co-ordination of college trips. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your student's personal data is kept secure. For further information on the kind of technology we use, please contact our Data Protection Officer (see paragraph 4).

5.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us. For example, we will provide education services to your student and will use personal data where necessary to deliver these services. We will also use your personal information to invoice you for our services pursuant to the contract between you and us. We will also require a certain amount of personal information about you and your student at the pre-contract enquiry and application stage.

5.4 In addition, we are required by law to do the following (which is not an exhaustive list):

5.4.1 keep an admissions and attendance register;

5.4.2 keep student files (including, where relevant, special education needs and student protection files);

5.4.3 keep a record of behaviour sanctions; and

5.4.4 provide an annual written report on student progress and attainment.

5.5 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Officer (see paragraph 4).

Information we collect about you from our website

5.6 We will use this information for the following legitimate interests:

5.6.1 to contact you if you have made an enquiry to one of our colleges via our online enquiry form and/or to inform you about available places in the future;

5.6.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.6.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;

5.6.4 to allow you and your student to participate in interactive features of our service, for example virtual learning environments, when you choose to do so; and

5.6.5 as part of our efforts to keep our website safe and secure.

Information we receive from other sources

5.7 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out

above (depending on the types of information we receive). For example, we may receive a court order relating to you which impacts on our use of your and your student's information to protect the welfare of the student.

5.8 Also, social services or health practitioners may provide us with information (particularly sensitive personal data) about your student which may need to be added to the college's student protection or special educational needs file. This kind of processing of sensitive personal data may be necessary (a) for the purposes of carrying out our obligations in the field of social security or social protection law, (b) for medical diagnosis or provision of health care and/or (c) to protect the vital interests of your student or another person taking into account the mental and physical capacity of your student.

5.9 In order to achieve the purposes described in paragraph 5.8, our colleges may do the following:

5.9.1 keep a list of your student's allergies or medical requirements within the classroom or staffroom in case of emergency. It is necessary for the college to have a list readily available to our staff so that we are able to look after your student promptly in the event of a medical emergency; and

5.9.2 rely on software applications and other technology to process medical information (such as allergies, accidents and injuries) about you and your student. For further information on the kind of technology we use, particularly in the context of processing sensitive personal data about your student, please contact our Data Protection Officer (see paragraph 4).

When we disclose information

5.10 In order to pursue one of the legitimate interests set out above, we may share your and your student's personal information with:

5.10.1 A member of the David Game College Group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;

5.10.2 local authorities, education authorities (for example, Ofsted), the Department for Education, SEN co-ordinators, social services or the police where we have reason to believe there are safeguarding concerns in respect of your student;

5.10.3 where your student is not British, we may have to provide information about you or your student to UK Visas and Immigration;

5.10.4 business partners, professional advisors, debt collector, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

5.10.5 credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

5.11 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use the terms of the parents' contract (between us and you) and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we need to get your consent

- 5.12 We will not market services to you (other than in accordance with paragraph 5.1.8 or 5.1.9 above) without your consent and you have the right to ask us not to use your contact details for marketing.
- 5.13 We will also seek your permission if we decide to post any photographs of your student on any of our marketing materials (including our prospectus, advertisements or website).
- 5.14 You or your student do not have to give us details about your student's race, religion or ethnicity if you do not want to. If you do provide us with this information, we only use these details to assist us with the day-to-day running of the college (for example, if your student's religion means that he or she has particular dietary requirements then we will of course be much better informed if we have this information to cater to your student's requirements) and for equal opportunities monitoring purposes.

Where you have given consent to the above, you can withdraw this consent at any time by contacting the Data Protection Coordinator (see paragraph 4).

6 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE THE EEA

- 6.1 The data that we process about you and your student may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). We try to limit this where possible but it may be necessary where, for example, one of our suppliers has a data centre outside the EEA. We will take all steps reasonably necessary to ensure that your and your student's data is treated securely and in accordance with this privacy notice and that the appropriate legal safeguards are in place prior to the transfer, for example ensuring that any contracts between us and the recipient of the information have EU-approved standard data protection clauses, or the country we are transferring the data to is deemed by the EU Commission as adequate.

7 YOUR RIGHTS

- 7.1 Under the GDPR, you and your student have the following rights:
- 7.1.1 **Right to correction.** You have the right to have inaccurate personal data about you or your student rectified.
- 7.1.2 **The right to erasure.** You have the right to request that we delete your and your student's personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details); (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.
- 7.1.3 **Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details).

- 7.1.4 **Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.
- 7.1.5 **Right to object.** You have the right to raise an objection to any of our processing in paragraphs 5.1 and 5.2. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.
- 7.1.6 **Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.
- 7.1.7 **Right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.
- 7.1.8 **Right to request access.** You have the right to access personal data we hold about you. We encourage you to contact the college's Data Protection Co-ordinator and request our standard SAR form for you to complete in order to help us process your request.

8 HOW LONG WE KEEP PERSONAL INFORMATION

- 8.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.
- 8.2 As a general rule, we keep your student's education records until they reach 25 years of age at which point we destroy the file. This is regardless of whether their file has been transferred to another college, in the event that your student transfers colleges.
- 8.3 We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Officer or Data Protection Co-ordinator (see paragraph 4).

9 USE OF OUR WEBSITE

- 9.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; 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.

10 CHANGES TO OUR PRIVACY NOTICE

- 10.1 Any changes we make to this privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Dated 1 Sep 2023