



Open Doors Online English Tutoring

Open Doors. Open Minds. Open Lives.

Privacy Policy

This Privacy Policy explains how Open Doors Online English Tutoring collects, uses, shares, and protects personal data in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR). Emily Grant, Founder and Owner of Open Doors Online English Tutoring, is committed to safeguarding the privacy and security of personal information provided in the course of tuition services.

1. Data Controller

1. Emily Grant is the data controller responsible for the processing of personal data collected through the tuition service provided by Open Doors Online English Tutoring. If you have any questions or concerns regarding the processing of your personal data, please make contact using the details provided at the end of this policy.

2. Legal Basis for Processing

1. Personal data is processed based on one or more of the following legal bases:
 1. Performance of a Contract: processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
 2. Legitimate Interests: processing is necessary for the legitimate interests of Open Doors Online English Tutoring or the legitimate interests of a third party, provided that such interests are not overridden by your interests or fundamental rights and freedoms.
 3. Compliance with Legal Obligations: processing is necessary for compliance with a legal obligation to which Open Doors Online English Tutoring is subjected to.
 4. Consent: processing is based on your consent, which you may withdraw at any time.

3. Information Collected

1. Open Doors Online English Tutoring collects and processes various types of information, including personal data, for the following purposes:
 1. Contact information (such as name, address, email address, and telephone number) to communicate with you regarding the tuition service and to schedule lessons.
 2. Student information (such as name, age, grade level, SEND or personal learning need documents and academic performance) to tailor tuition sessions to individual student needs and monitor progress. Home address and school address are collected to ensure that the Safeguarding Policy can be carried out and therefore to protect and safeguard all young people who work with Open Doors Online English Tutoring.

4. Use of Information

1. Open Doors Online English Tutoring uses the information collected for the following purposes:
 1. To provide tuition services and fulfil contractual obligations towards students, parents/guardians, schools/local authorities and/or other organisations involved in the tuition service.
 2. To communicate with students, parents/guardians, tutors, teachers (where applicable) and clients regarding tuition sessions, scheduling, updates, feedback, and employment agency introductions (where applicable).
 3. To monitor student progress and academic performance and provide feedback and support as necessary.
 4. To comply with legal and regulatory requirements, including record-keeping, reporting, safeguarding obligations, and employment agency regulations.
 5. To improve the tuition service, develop new programs, enhance the overall learning experience, and facilitate successful tutor-client introductions, where applicable.

5. Sharing of Information

1. Open Doors Online English Tutoring may share personal information with the following categories of recipients:
 1. Parents/Guardians: student information may be shared with parents/guardians to provide updates, feedback and progress reports.
 2. Clients: the details about past students may be shared with new clients to help them understand how Open Doors Online English Tutoring has helped previous students and how it can therefore help them. Client

information will never be shared with another client without the written consent of the data subject.

3. **Schools:** information may be shared relating to students with schools and their employees (e.g. teachers) either where the school is the client of Open Doors Online English Tutoring and has contracted for the delivery of tuition services to one or more of their students, or where a Parent/Guardian for the student has given their consent, in writing, to share information with the student's school. Schools may also be contacted to uphold the Safeguarding Policy.
 4. **Service Providers:** third-party service providers may be engaged to assist in providing tuition services or introductions to tutors, such as IT service providers, payment processors, and administrative support.
 5. **Regulatory Authorities:** information may be disclosed to regulatory authorities or law enforcement agencies as required by law or to protect the legal rights of Open Doors Online English Tutoring.
2. Open Doors Online English Tutoring does not sell or rent personal information to third parties for marketing purposes.

6. Data Retention

1. Open Doors Online English Tutoring retains personal information for as long as necessary to fulfil the purposes for which it was collected, including any legal, accounting, or reporting requirements. The specific retention period for personal data may vary depending on the nature of the data and the purposes for which it is processed. Contact details, records of lessons and reports will be kept until the young person is 18 years of age, in the interests of safeguarding. They will then be securely deleted. Data for accounting will be kept in accordance with the requests of HMRC and then securely deleted. When the Student's tuition with Open Doors Online English Tutoring comes to an end, the Client will be asked if they give consent for their contact details, such as email address and telephone number, to be retained so that the Tutor can contact them regarding their experience with the service, to help inform new clients about the service.

7. Data Subject Rights

1. Under applicable data protection laws, you have certain rights regarding your personal data, including:
 1. **Right of Access:** you have the right to request access to your personal data and information about how it is processed.
 2. **Right to Rectification:** you have the right to request the correction of inaccurate or incomplete personal data.
 3. **Right to Erasure:** you have the right to request the deletion of your personal data under certain circumstances.

4. Right to Restriction of Processing: you have the right to request the restriction of processing of your personal data under certain circumstances.
 5. Right to Data Portability: you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another data controller.
 6. Right to Object: you have the right to object to the processing of your personal data under certain circumstances, including processing for direct marketing purposes.
 7. Right to Withdraw Consent: if processing is based on your consent, you have the right to withdraw your consent at any time.
2. To exercise any of these rights, or if you have any questions or concerns about the processing of your personal data, please contact Emily Grant using the details provided at the end of this policy.

8. Data Security

1. Open Doors Online English Tutoring implements appropriate technical measures and adopts relevant policies and processes, as an organisation, in order to protect the security and confidentiality of personal information. These measures include access controls (e.g. secure passwords), encryption, 2-factor authentication, and regular security assessments. However, please note that no method of transmission over the internet or electronic storage is 100% secure, and absolute security cannot be guaranteed.
2. Special category data and data relating to children (under the age of 18) and vulnerable adults ("Sensitive Data") that is collected and processed in accordance with this policy shall be stored subject to additional reviews to satisfy that the storage and processing of that data is appropriate. In particular, Sensitive Data shall be subject to the following additional safeguards:
 1. Open Doors Online English Tutoring shall review where Sensitive Data is stored periodically and at least every three (3) months to ensure that it is appropriately secured and protected.
 2. Open Doors Online English Tutoring shall maintain robust processes that govern the access to and retrieval of Sensitive Data, which shall include:
 1. Who can access Sensitive Data, and how much access they will need at any given point in time in order to discharge the duties of Open Doors Online English Tutoring to you or to any lawful authority;
 2. What Sensitive Data is permitted to be used for (which shall be restricted only to that use which is reasonably necessary for Open Doors Online English Tutoring to discharge contractual and/or statutory duties);

3. What processing takes place when Sensitive Data is retrieved, including guidelines about what copies might be made, what they will be used for and where they will be stored.
3. In the event that there was to be any data breach of any kind (either suspected or known), Open Doors Online English Tutoring will undertake to:
 1. Immediately take action to assess and mitigate the extent of any such breach.
 2. Take steps to promptly assess what data has been, or may have been, compromised.
 3. Inform data subjects of the data breach, using clear and jargon-free language.
 4. Take any measures that may be necessary in order to prevent compromised data being used by an unauthorised third party (e.g. recommending to data subjects that they change passwords that may have been compromised).
 5. Where appropriate, Open Doors Online English Tutoring will keep data subjects informed of any change to the level of assessed risk that exists as a result of any such breach.

9. Changes to this Privacy Policy

1. Open Doors Online English Tutoring reserves the right to update or modify this Privacy Policy at any time. Any changes will be effective immediately upon posting the updated Privacy Policy on the website. We encourage you to review this Privacy Policy periodically for any changes.

10. Contact

1. If you have any questions or concerns about this Privacy Policy or the data practices used by Open Doors Online English Tutoring, or if you wish to exercise your data subject rights, please make contact at:

Open Doors Online English Tutoring

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