



Privacy Policy

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Privacy Policy

“Welcome to Tecnis Academy's privacy policy! We respect your privacy and are committed to protecting your personal data. In this privacy policy, we tell you about how we look after your personal data when you interact with us. We also tell you about your privacy rights and how the law protects you. Please email us if you would like a copy of this policy in pdf format: admissions@tecnisacademy.com”

1 ABOUT THIS POLICY

This privacy policy aims to give you information about how Tecnis Academy collects and handles your personal information when you visit our website, attend our event, contact us, join our programs or subscribe to our mailing list. Important words in this policy are explained in the Glossary section at the end of this policy.

We do not generally collect personal information about minors through our website. Personal information about minors are collected directly from and with the consent of parents / guardians through telephone, email, face-to-face interaction as well as online forms.

It is important that you read this privacy policy together with any other privacy information we may share from time to time, so you are fully aware of how and why we are using your personal information. This privacy policy applies in addition to any other notices we may share, and it is not intended to cancel it.

We keep our privacy policy under regular review. Historic versions can be obtained by contacting us.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2 ABOUT US

Tecnis Academy Limited is the data controller responsible for your personal data. Tecnis Academy is the trading name of Tecnis Academy Limited. We are a company registered in England and Wales under company registration number 10607672. Our registered office is at 55 Ingledew Road, London, England, SE18 1AP. However, general correspondence should be directed to our Sittingbourne office set out below.

3 CONTACT DETAILS

If you have any questions about our privacy practices, please contact our data privacy manager in the following ways:

Email: admissions@tecnisacademy.com.

Post: Tecnis Academy, Grid House, Crown Quay Lane, Sittingbourne, ME10 3HZ.

WhatsApp: +44 7792 834 542.

Telephone: +44 1795 358 030 (basic call charges apply in the UK)

Office hours: Mon - Wed 12:00 - 20:00, Thu - Fri 12:00 - 23:00, Saturday 9:00 - 23:00 and Sunday 10:00-18:00 GMT.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4 ABOUT THE DATA WE COLLECT

It is important that the personal information we hold about you and the pupil is accurate and current so please keep us updated if your personal information or that of a pupil changes during our professional relationship.

If you fail to provide the personal information requested, we may be unable to perform the contract we have with you or are trying to enter into with you. In this case, we may have to cancel your registration or subscription, but we will notify you if this is the case at the time.

4.1 Types of data we collect

Personal information means any information about an individual that can identify them. It does not include information where the identifier has been removed. We may collect, use, store and transfer different kinds of personal information about you and a pupil. The personal information is grouped as follows:

- (a) **Identity Data** such as the names, age, date of birth and gender of pupils and parents / guardians.
- (b) **Contact Data** such as the residential address, email address and telephone numbers of pupils and parents / guardians.
- (c) **Financial Data** such as the parent / guardians' payment card details and payment records.
- (d) **Academic Data** such as information about a pupil's school, academic performance, and any applicable special educational needs.

- (e) **Tuition Data** such as recordings of the virtual classes, subscription details, attendance records, usernames, homework records, assessment results and meeting records.
- (f) **Technical Data** when you visit our website such as the visitor's internet protocol address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- (g) **Usage Data** such as information about how you use our website and services.
- (h) **Marketing and Communications Data** such as your preferences in receiving marketing from us and your communication preferences.

4.2 Virtual class recordings

Please note that our virtual classes are recorded, and the recordings are archived and made available to pupils to view on-demand via Google classroom. The aim of the recording is to give pupils the opportunity to catch up if they miss a class as well as help them to consolidate information taught in class. The recordings are stored on our Google drive for a period of 12 months and deleted afterwards. For instance, a virtual class recorded in March 2023 would be deleted in March 2024.

We do not share class recordings externally. The recordings are used internally for educational, quality assurance and safeguarding purposes.

During a class recording, the camera will generally focus on the tutor leading the class. However, occasionally, the camera may redirect to individual pupils to the extent they make sounds or speak during the class. You can minimise the pupil being captured in the recording by maintaining the microphone on mute throughout the class. **You must not join our online tuition program unless you consent to the recording, storage and sharing of class recordings.**

4.3 Photos

We may occasionally take photos of classes and pupils for use in our marketing campaigns. We will not, however, use any pupil images without your prior written consent. Your consent/refusal is obtained at the start of our professional relationship and can be updated at any point during our relationship by contacting us.

4.4 Aggregated Data

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal information but is not considered personal information in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the number of pupils accessing a specific program or class. However, if we combine Aggregated Data with your

personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will be used in accordance with this privacy policy.

4.5 Special Categories of Personal Data

At the point of registration, we may ask you to confirm whether your child has any special educational needs (**SEN**). It is completely within your discretion to disclose this information. However, you should note that any undisclosed SEN means we cannot confirm your child's suitability for the program or support your child during the program. If you disclose a SEN, we will need your consent to utilise this information internally to support your child during the program. You should indicate your acceptance or refusal on the program registration form. You may update your permissions later by contacting us. We cannot use SEN information without the explicit consent of the parent/ guardian.

SEN related information is classified as special category data under data protection laws. Special category data is information about you or your child's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, and genetic and biometric data) or any information about criminal convictions and offences. SEN related information will only be disclosed to academy staff on a need-to-know basis and staff are required to maintain the integrity and confidentiality of this information.

Lawful basis and condition

Special category data is personal data that needs more protection because it is sensitive. In order to lawfully process special category data, we must identify both a lawful basis under Article 6 of the UK GDPR and a separate condition for processing under Article 9.

Our lawful basis for processing your child's SEN information is:

(a) Consent: clear consent supplied from the parent / guardian of the pupil to process the SEN data to (1) confirm the suitability of the tuition program for the pupil and/or (2) support the pupil during the tuition program.

(b) Contract: the processing of the SEN data is necessary to (1) support the pupil during the subscription or (2) confirm the suitability of the subscription being applied for.

Our condition for processing the SEN related information is:

Explicit consent: the parent / guardian of the pupil has given us clear consent to process the SEN data to (1) confirm the suitability of the tuition program for the pupil and/or (2) support the pupil during the tuition program.

Retention

Information about SEN will be maintained during the course of our subscription to ensure the pupil is supported. All data relating to SEN will be deleted at the point of discontinuance of your application or subscription.

5 HOW THE DATA IS COLLECTED

5.1 Methods of collection

We use different methods to collect data about you and the pupil including through:

- **Direct interactions.** You may give us your Identity, Contact, Academic, Tuition, Financial and Usage Data by filling in forms or by corresponding with us in person, by phone or by email. This includes personal data you provide when you attend our event, give us feedback or contact us, subscribe to our program or join our mailing list.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie Policy available to view from our website: <https://tecnisacademy.com>.

5.2 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the subscription you are applying for or have entered into.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data (except in the case of special category data).

5.3 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal reasons we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need more information about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To sign up for a program, attend our event or to enquire about a program	(a) Identity (b) Contact (c) Academic (d) Tuition (e) Marketing and Communications	(a) Consent (special category data) (b) Performance of a contract with you (c) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To process and deliver your subscription including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Academic (e) Tuition	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which includes sharing information about our programs, our terms and policies	(a) Identity (b) Contact (c) Academic (d) Tuition (e) Marketing and Communications	(a) Consent (special category data) (b) Performance of a contract with you (c) Necessary to comply with a legal obligation (d) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer our programs and business generally (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of website data)	(a) Identity (b) Contact (c) Academic (d) Program (e) Technical	(a) Consent (special category data) (b) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security etc.) (c) Necessary to comply with a legal obligation
To use data analytics from our website and business generally to improve our website,	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant and to develop our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
programs, marketing, client relationships and experiences		

5.4 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5.5 Marketing

We may use your Identity, Contact, Technical, Usage, Academic and Tuition data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Opting-in: We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out: You can ask us or any third party to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us/them at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of service purchase.

5.6 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or malfunction. For more information about the cookies we use, please see our Cookie Policy available to view from our website: <https://tecnisacademy.com>.

6 DISCLOSURES OF PERSONAL DATA

We may share your personal data with the following third parties for the purposes set out in the table above:

- **Service providers:** acting as processors who provide IT and system administration services.
- **Professional advisers:** such as lawyers, accountants, bankers, brokers, and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services to our business.
- **Public bodies:** HM Revenue & Customs, regulators and other authorities based in the United Kingdom.
- **Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.** If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7 INTERNATIONAL TRANSFERS

Some of our staff are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data outside of the UK, we ensure a similar degree of protection is afforded to it by applying the same level of protection it has in the UK abroad.

8 DATA SECURITY

We have put in place reasonable security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those staff members, agents, contractors and other third parties on a need-to-know only basis. They will only process your personal information on our instructions.

9 DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law we have to keep basic information about our service users (including Contact, Identity, Financial, Academic and Tuition Data) for six years after they cease being customers for legal purposes. In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10 YOUR LEGAL RIGHTS

10.1 Legal rights

You may have the following rights under data protection laws in relation to your personal information:

- a) Right to request access to your personal data
- b) Right to request correction of your personal data
- c) Right to request erasure of your personal data
- d) Right to object to processing of your personal data
- e) Right to request restriction of your data processing
- f) Right to request transfer of your personal data
- g) Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us via email: admissions@tecnisacademy.com.

10.2 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

10.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11 GLOSSARY

- 11.1 Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- 11.2 Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 11.3 Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- 11.4 Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 11.5 Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 11.6 Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 11.7 Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- 11.8 Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- 11.9 If you want us to establish the data's accuracy.** Where our use of the data is unlawful, but you do not want us to erase it. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims. You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- 11.10 Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 11.11 Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.