



Riviera Tuition Privacy Policy

Updated and reviewed on the 21st of May 2018.

Riviera Tuition Limited is registered as a Data Controller and Processor with the ICO. Our number is ZA385402. We have appointed a Data Protection Officer.

How we use your information

This privacy notice tells you what to expect from our company, Riviera Tuition Limited, when we collect personal information from you. By requesting or using our services, you accept and consent to our use of your personal data as outlined in this policy.

We feel strongly that to provide you with the service you need, trust is absolutely paramount. We want to be completely transparent about the way that we hold and use your data, as well as the reasons for asking for the particular data that we do ask for. Above all, we want to make it clear that we only ask for information that is strictly relevant for delivering the service that you ask us to deliver.

Parents and potential students

If you wish to engage our tuition services then you will be asked to fill in our registration details with the necessary contact information detailed to allow us to set up your tuition booking correctly. Once your form is submitted, it is stored instantly on our secure booking system which is where all of our client data e.g. contact details, booking and payment information is held. Please note: we do not store debit or credit cards numbers and ask clients to pay securely via BACS through their own bank. Only authorised office personnel and your appointed tutor will have access to your data. This is password protected and each member of staff has their own login to facilitate entry to client data. Your data will only be used for correspondence about the service you are receiving from us unless you “opted in” to receive marketing information about other services we offer.

Tutors and potential tutors

When we receive an enquiry from a potential tutor we ask for you to send in a copy of your CV. If selected, we will invite you to interview. We keep data such as your gender, name, address, schools attended, interests, employment history, contact details, email address, a photograph and your age on file. We use this information to build a profile, that may appear on our website and be directly accessible by the public. Public-facing profiles on our websites contain your photograph but do not include your last name or any of your contact details. However, when we discuss you as a suitable candidate to parents, we will use your full name. We keep a record of your bank details to allow us to transfer payments for your tuition to you.

We keep sensitive data such as your DBS certificate number in our CRM software, which is password protected. All tutors who work with us are required to hold a valid DBS – we believe this is a ‘legitimate interest’ in our business model because parents and students normally only want to work with tutors who can prove they do not have a criminal record. We will at all times, use our discretion to supply basic information to discuss your suitability for a job with a parent or student. If the parent or student decides to go forward and arrange a meeting, call or interview with you, we will share your basic contact information with them.

Visitors to our website

When someone visits our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the Riviera Tuition website. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. We use Google Analytics to help analyse use of our website. This analytical tool uses ‘cookies’, which are text files placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. If you do not want our website to use “cookies”, you need to disable them on your internet browser before using our website.

This information is then used to evaluate visitors’ use of the website and to compile statistical reports on website activity for Riviera Tuition. We will not (and will not allow any third party) to use the statistical analytics tool to track or to collect any personally identifiable information of visitors to our site. We will not associate any data gathered from this site with any personally identifying information from any source as part of our use of the Google statistic analytics tool. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Job applicants, current and former Riviera Tuition employees

When individuals apply to work at Riviera Tuition, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Disclosure and Barring Service we will not do so without informing them beforehand unless the disclosure is required by law. Personal information about unsuccessful candidates will be held for so long as is reasonably necessary. When a person has taken up employment with us, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with Riviera Tuition has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Protecting your data

All our employees are under a duty of confidentiality to protect the integrity of your data. They will not disclose any information of a confidential nature, unless required by law to do so. We have extensive features in place to protect all personal data held. These include:

- All computer access is secured with strong password authentication, and access to shared network drives is limited to authorised staff
- Passwords are changed periodically
- Data is stored on secure and encrypted hosted infrastructure only accessible by authorised staff
- All computers have anti-virus & anti-malware software installed which is updated continually.
- All networks are secured using firewalls to protecting incoming and outgoing traffic to the internet.

Unfortunately, the transmission of data over the internet is not completely secure and although we use our best efforts to protect your data once it has been received, we cannot guarantee the security of your data while it is being transmitted, either as an email, enquiry form, phone call or other communication.

Complaints or queries

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information.

However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address at the end of this notice.

Your rights

At any time, you have the right to ask us what information we hold about you, to access and rectify this information and to erase and to restrict the processing of data we hold. You also have the right to object to any data that we hold, and the right not to be subject to automated decision-making, including profiling.

Erasure of your material

At your request, we will remove all personal data held about you, with the exception of billing information, or any other information, that we are required to keep by law.

Portability of your data

We can provide basic contact information in the form of a excel spreadsheet or print out of your account on our booking system.

Corrections to your data

You may inspect the data we hold through your client account, for which you will have a login and password. You may also call or email us to check, or change any information that we hold. We ask parents, students and tutors to take responsibility for providing us with accurate, up to date information. Under your, 'Right to rectify', you may contact us at any time to update this information.

Restriction of data processing

If at any point you wish us to stop processing your information, for the purposes we explained previously, you may do so by calling, emailing or writing to us.

Automated decision making

We use a simple computer system to provide an initial search of our database to match tutor with student. You may opt out of this if you wish, but please note that we will then be unable to deliver the service you asked us to.

Access to personal information

We try to be as open as possible in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will: give you a description of it; tell you why we are holding it; tell you who it could be disclosed to; and let you have a copy of the information in an intelligible form. To make a request to us for any personal information we may hold you need to put the request in writing addressing it to our Internal Compliance Team or writing to the address provided below. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we need to print or post documents we will do this at no charge to you. If the requests are manifestly unfounded or excessive, we may make a small charge of up to £10 for doing so. If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Internal Compliance Team. We will provide the information you requested within 30 days. We will ask for proof of identity to ensure that we are sending your information to the correct person.

Disclosure of personal information

We will not disclose personal data without consent. However, if we are required by law to disclose information, we will do so. This privacy notice does not cover the links within our website linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Use of your data

We use some of your data to perform our legitimate interest of introducing tutors to parents. In the first instance, we never share surnames, or personal contact details. However, when both tutor and student have agreed to work together, we share all contact details, so that the parties may arrange tuition. Tutors will be assigned to a client on our booking system and all client data will then be visible on their interface. Client data (e.g. address and phone numbers) will not be sent via email to the tutor. They will login securely to view the client data. Tutors are all interviewed and DBS certification details are collected. We do not share your personal data with any external companies. We will always make full use of your personal data to collect any debt that is owed to us or to notify you of any changes to our service that will affect you. We will only share the minimum information required and any information we share will fall under the auspice of being of 'legitimate interest'.

Newsletters

Occasionally we will contact you with information about educational courses or other services that we think may be of interest to you. This will usually be by email, letter or brochure. We only send these to registered clients or to individuals who have signed up to our newsletter through our website and opted in. We send newsletters only when we believe there is a legitimate interest to do so. We will always provide you with the option to opt out of these notices and we will always ask you to opt-in, or sign up to these mailings in the first instance. We will not otherwise email you with marketing information. We may use your cookies from our website to use Google Remarketing Campaigns. We will never share with or sell your information to third parties. We may also from time to time, survey you, or ask you questions in an email. Your responses are held securely and not shared with others. We may use a comment you have made about our service in our marketing material but we will never use your name, without specifically asking you if we can.

Lawful Basis to use your data

We retain data under the Legitimate Interests basis. We use your data in a way that you would reasonably expect us to use it and which has a minimal impact on your privacy. In this case, the legitimate interest is to record your personal details in order to allow us to carry out our legitimate work of introducing a tutor to a student. If we do not have the data, we will be unable to do this work because we cannot effectively match student to tutor. We also use your data to prepare billing and other account related services. We also use it to send emails about our services. We always strive to balance the collection and use of this data against your individual rights and freedoms and only ever ask for information that we legitimately need in order to do our work for you. We assess these details in a Legitimate Interests Assessment, which is available for you to see. We hold your data for as long as is reasonably necessary, unless you ask us to remove it, as you are entitled to do. If you are not happy about the way that we retain your data, you can contact the Information Control Officer (ICO).

Consent

By signing your agreement with us, you have additionally given us implicit consent to use your information to allow us to fulfil the terms of our agreement with you.

Data breaches

We have rigorous procedures in place to prevent data breaches. In the event of a breach that is likely to result in a high risk to the rights and freedoms of individuals, we will notify those affected directly and we will also notify the ICO.

Changes to this privacy notice

We keep our privacy notice under regular review and we will place any updates on this webpage. This privacy policy was last updated on 21st May 2018.

How to contact us or make a complaint

Requests for information about our privacy policy can be emailed to the Internal Compliance Team (admin@rivieratuition.co.uk) or by writing to our Data Protection officer: Emma Walton, who is contactable as follows:

Riviera Tuition Limited, 42 – 44, The White House, The Terrace, Torquay, TQ1 1DE
admin@rivieratuition.co.uk You can also call us on 01803 431580.