Privacy Policy

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Privacy Policy

Introduction

PRIVACY POLICY

This privacy policy sets out how AP Tutoring Limited, trading as Sunbeam Education, uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a copy of the policy here: [LINK].

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1. Important information and who we are

Privacy policy

This privacy policy gives you information about how Sunbeam Education collects and uses your personal data through your use of this website (which includes our web app, accessible via https://app.sunbeameducation.com/), including any data you may provide when you create an account with us, sign up to our newsletter, or book a tutoring session.

This website is not intended for children, rather for tutors and guardians of children.

Controller

AP Tutoring Limited, a limited company registered in England and Wales with company number 14617626 and registered office address at Brook Cottage, Filkins, Lechlade, England, GL7 3JQ is the controller and responsible for your personal data (collectively referred to as “Sunbeam Education”, “we”, “us” or “our” in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact us using the information set out in the contact details section (paragraph 10).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, any previous names, username or similar identifier, title, date of birth and gender.
- Contact Data includes billing address, residential address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us or from the tutors on our platform.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- Profile Data includes your username and password, profile picture, bookings made by or with you, your interests, preferences, educational and professional background, feedback, reviews you have given or received, and survey responses.
- Usage Data includes information about how you interact with and use our website, products and services.
- Messages Data. Messages you send and receive, including their content.
- Medical Data includes the medical diagnosis or condition of a guardian’s child, and their special educational needs.
- Criminal history includes the information provided via the Disclosure and Barring Service (DBS) by tutors when applying to become tutors on our website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals’ Usage Data to calculate the percentage of users accessing a specific website feature to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

3. How is your personal data collected?

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

- **Your interactions with us.** You may give us your personal data by filling in online forms, creating accounts, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - book tutoring sessions as a customer;

    - apply to become a tutor on our website;
    - create an account on our website;
    - subscribe to our service or publications;
    - request marketing to be sent to you;
    - use our platform and, for example, exchange messages with tutors or clients;
    - enter a competition, promotion or survey; or
    - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical 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 for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
    - Technical Data, such as analytics, is collected from providers such as Google based outside the UK.
    - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as Stripe based outside the UK.
    - Criminal records data is collected via the Disclosure and Barring Service (DBS).

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter or ask us to match you with a tutor (if you are a customer), or customer (if you are a tutor).

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 the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To assess your suitability to become a tutor on our website	(a) Identity (b) Contact (c) Profile (d) Criminal	(a) Necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Controller or the Data Subject in connection with employment, social security or social protection. (*Paragraph 1(1)(a), Schedule 1, DPA 2018*.) Meets one of the substantial public interest conditions set out in Part 2 of Schedule 1 to the DPA 2018 (such as preventing or detecting unlawful acts).(*Paragraph 10(1), Schedule 1, DPA 2018*.) (b) Consent
To minimise the risk of misuse of our platform	(a) Messages Data.	(a) Consent (b) Necessary for our legitimate interests (to protect users of our platform and minimise the risk of misuse)
To register you as a new customer or tutor	(a) Identity (b) Contact (c) Transactional (d) Profile (e) Financial	(a) Performance of a contract with you (b) Consent When you register as a customer, or apply to become a tutor, we your collect personal data.
To process your booking of a tutoring session including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Medical (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Consent To properly match you with a tutor on our website, we need to collect and process your personal data. This is so that we can introduce you to a tutor that matches your preferences.
To enable tutors to deliver their tutoring sessions to customers	(a) Identity (b) Contact (c) Transactional (d) Profile (e) Medical	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to enable tutors to perform their contract and for the platform to work effectively as an introducer of tutors to customers) For a tutor to deliver its services to a customer, we must share the customer's personal data with the tutor. This is so that the tutor is aware of the customer's requirements, needs and preferences.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you).
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation.
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	For tutors: necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) For customers: consent, having obtained your prior consent to receiving direct marketing communications.
To carry out marketing activities to promote our business	(a) Profile	Necessary for our legitimate interests (to promote our business so that we can grow our business). PLEASE NOTE that this will entail promoting your profile picture, user name and reviews across marketing channels including (but not limited to) Meta.
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

Direct marketing

During the registration/booking/account-creation process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from Sunbeam Education via email, SMS, telephone and post. You will also 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 the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us *https://sunbeameducation.com/contact*.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to booking confirmations, appointment reminders, updates to our Terms of Service, checking that your contact details are correct.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see *https://sunbeameducation.com/cookie-policy/*.

5. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

- Specific third parties listed in the table *Purposes for which we will use your personal data* above, such as tutors (if you are a customer), or customers (if you are a tutor).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. 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 data 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.

6. International transfers

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that we only transfer your personal data to organisations in countries that have been deemed by the UK to provide an adequate level of protection for personal data, namely, to US companies US organisations that have signed up to the Data Privacy Framework by means of certification.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and

other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

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 must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (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.

9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a “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.
- 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.
- Request erasure of your personal data in certain circumstances. 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.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see *OPTING OUT OF MARKETING* in paragraph 4 for details of how to object to receiving direct marketing communications).
- 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.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
    - 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; or
    - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us see Contact details (paragraph 10).

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.

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.

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.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: info@sunbeameducation.com
- Postal address: Brook Cottage, Filkins, Lechlade, England, GL7 3JQ

11. Complaints

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 (https://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.

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 21.11.2024. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third partises to collect or share data about you. We do not control these 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.