

Privacy Policy



Date of Approval: 01 September 2023
Approved by: Shelley James
Position: Data Protection Officer
Next review: 31 August 2024

BrightTeach Limited ("we", "our" or "BrightTeach") is committed to protecting the privacy of all visitors to our Website brightteach.com and all visitors who access our Website or services through any mobile application (together, "Website").

Please read the following privacy policy which explains how we use and protect your ("you" or "your" refer to any User, no matter whether you are a Tutor or Student) information, as the data controller for the purposes of the GDPR (General Data Protection Regulations EU 2016/679) and related UK legislation.

We reserve the right to modify this notice without notice by posting any changes on our Website.

Information That We Collect

- When you visit the Website or purchase a lesson through the Website or via email or phone call, you may be asked to provide information about yourself including your name, address, and contact details.
- When you visit the Website as a Tutor and/or make contact with us via phone call or email, you may also be asked to upload personal identification documents about yourself, such as a driving licence, passport, or Disclosure and Barring check, and may be asked to provide personal banking details.
- When you register on the Website or via email or phone call as a Tutor, we may ask you to provide personal information of individuals who can provide a reference to evidence your suitability to tutor with us.
- When you register on the Website or via email or phone call as a Tutor, we may ask you to provide details of any criminal convictions (including a DBS certificate or update service details).
- When acting as a referee, you may be asked to provide information about yourself including your name, address, and contact details, and details of the suitability of the tutor who has provided your details.
- When you request a lesson from a Tutor, we may collect your payment information, such as credit or debit card information.
- We may also collect information about your usage of the Website and information about you from the messages you post on the Website or directly to us through email, text or other forms of online communication, including but not limited to messages you send to a Tutor, files you upload, and your communications with us via email and SMS.

- We record all online lessons that take place through our platform, store any files you may upload to the online classroom and data on any interactions you may have in the classroom.
- We collect technical data about your use of the Website, including the device and browser that you are using, your IP address, your time on the Website and the pages that you have visited.
- We may ask for your payment information, such as debit or credit card details. All payment card information is handled by a third party. We do not handle any payment card information ourselves, and are not PCI compliant.

How we use your data

- Your information will enable us to provide you with access to the relevant parts of the Website and to supply the services you have requested.
- If you are a Student, we will use this data to put you in touch with the Tutor you have contacted. The information will also enable us to bill you for lessons you have completed, and contact you where necessary concerning our services.
- If you are a Tutor, your Identity documents will allow us to comply with Know Your Customer legislation, Recruitment Agency legislation, and your bank details will allow us to pay you for lessons you have completed.
- If you are a Tutor on our Website, we will screen your application to ensure that your qualifications and experience make you suitable to tutor with us, and to ensure that you have the right to work in the UK.
- If you are a Tutor and have provided details of individuals you wish to provide a reference, we will contact those individuals and request feedback on your suitability to tutor with us.
- If you are a Tutor who has registered details of any criminal convictions (including a DBS certificate or update service details) we will check these details against the Disclosure and Barring Service database.
- If you are a Tutor using our website, in order to make the best matches possible, we may use automated decision making to rank you against other Tutors when displaying search results to Students. The main scoring categories used to inform this decision making process and your current scores are communicated to you through your dashboard on the Website. If your score falls below a certain threshold, your profile may automatically be removed from the results displayed on the Website and you may no longer be given access to jobs. We may remove your profile automatically should we deem you are an inactive Tutor.
- Your Website use and messaging history will allow us to provide you access to your communications history with Tutors, and help us to settle any disputes that may arise.
- If you are a User of our Website sending messages to other Users, we may screen your messages to ensure that contact details are kept private until a Lesson Booking is confirmed.
- If you have completed an online lesson either as a Tutor or a Student, we may record the lesson so that you may view it later. In addition, we store lesson recordings to help with child safeguarding.

- Where you have indicated accordingly, you agree that we may use your information to let you know about our other products and services that may be of interest to you including services that may be the subject of direct marketing and we may contact you to do so by post, telephone, SMS, e-mail, social media or direct mail.
- We may contact you for internal market research purposes, to find out how we can improve our services to better meet the needs of our users.
- If you do not want us to use your data in this way or change your mind about being contacted in the future, please let us know by contacting us on info@brightteach.com
- We may retain personal data from closed accounts in order to comply with legal obligations, enforce our terms and conditions, prevent fraud, collect any fees owed, resolve disputes, and assist with any investigations and take other actions as permitted by law.

Purposes for which we will use our personal data

We have set out below, in a table format, a description of all the ways we plan to use 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.

Note that 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 details 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.

Category of Personal Data	Purpose/Activity	Lawful basis for processing including basis of legitimate interest
Personal details including name and contact information	To enable us to register you as a new customer and to enable us to manage and process transactions and our relationship with you. We also use contact information to deliver notifications and relevant marketing materials.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us). (c) Necessary for our legitimate interest (to develop and grow our business).
Identity verification information	To enable us to verify the identity of Tutors using the Website and comply with money laundering regulations.	(a) Performance of a contract with you. (b) To meet our legal obligations.
Profile details	Profile details provided by Tutors are used to process Tutor applications to join the site. Some data collected by third parties and automatically generated data (Tutor reviews and Tutor scores for example) are used to	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how

	<p>assess Tutor’s continuing suitability to use Tutorful, as communicated on Tutor dashboards, in our FAQs and in our t&cs.</p>	<p>customers use our products/services)</p>
<p>Credit card information and payment details</p>	<p>To facilitate transactions including billing Students for Lessons as agent for the Tutor and passing on payments to Tutors for lessons taught.</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to be able to take payments for services).</p>
<p>Location details</p>	<p>To enable us to fulfil our contract in helping to facilitate matches between Tutors and Students through the Website and to allow us to invoice for Lessons. Anonymised location data is also used to aid us in understanding our user base through analytics.</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to be able to provide and take payments for services).</p>
<p>Special categories of personal information including criminal conviction information</p>	<p>To enable us to display “Background Checked Status” on Tutor profiles, as described in our t&cs.</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interest (to be able to display “Background Checked Status” on Tutor accounts).</p>
<p>Electronic identification data including IP address and information collected through cookies</p>	<p>To enable us to analyse the use of the Website and help improve the Website’s usability.</p>	<p>(a) Necessary for our legitimate interest (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).</p>
<p>User activity details and user preferences</p>	<p>To enable Users to communicate with other Users of the Website, to facilitate matches between Tutors and Students and to aid our understanding of our User base. User preferences are stored to enable us to comply with user preferences.</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interest (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).</p>

Contractual details including the goods and services provided	To enable us to facilitate transactions correctly and to fulfil our legal obligations to keep financial records.	(a) Performance of a contract with you. (b) To meet our legal obligations.
Device and browser details	To help us improve the Website's usability.	(a) Necessary for our legitimate interest (to enable us to keep our Website updated and relevant, and improve its usability).

Disclosure of your information

- The information you provide to us may be transferred to and stored on our servers, or servers of third party providers. Sometimes it may be necessary to transfer data that we collect from you to locations outside of the European Union for processing and storing.
- If you are using the Website or have established tutoring with us, we may disclose your personal information to a Tutor, which may include your first name, contact details, and address, in order for them to provide tuition services to you.
- If you are one of our Tutors, we may disclose information about you to help match you to new Students. This includes your first name, approximate location, any references you have received and any information you have declared on your public profile. If you agree to give lessons to a Student, we may also disclose your address and contact details to the Student in order for you to deliver the lesson.
- If you are one of our Tutors and provide details of criminal convictions (including a DBS certificate or update service details) we will award a DBS-checked status on your profile where your DBS check is found to be clean and within the time restrictions set out within our Terms and Conditions.
- If you are one of our Tutors and provide details of referees, we will contact those individuals, inform them of your desire to tutor with us and seek feedback on your suitability to do so.
- If you are using the Website as a referee, we may disclose information about the reference you have provided to the Tutor and other Users visiting our Website. This will be limited to the reference provided, your first name and surname initial.
- We use third parties to process information such as credit card information and bank account information. By giving us your personal data, you agree to this transfer, storing or processing by these third parties. **We never give your details to third parties to use your data to enable them to provide you with information regarding unrelated goods or services.**
- We may use the information that you provide to us if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation; or in order to enforce our Website Terms and any other agreement, or to prevent fraud.
- In the event that we sell any or all of our business to a buyer, or enter into a joint venture with another business entity, your information may be disclosed or

transferred to the target company, our new business partners or owners or their advisors.

Security

- We take protecting your data seriously and take steps to protect your information from unauthorised access, accidental loss, destruction and damage.
- Unfortunately the sending of information via the internet is not totally secure and on occasion such information can be intercepted. Although we will take steps to protect your information, we cannot guarantee the security of data that you choose to send us electronically and sending such information is entirely at your own risk.
- To ensure that all new features and changes to our service adhere to GDPR requirements we follow a design by data protection by design and default approach to all development of our Website and service. This includes submitting Privacy Impact Assessments to the ICO as needed.

Data Retention

- We will keep your information for 7 years from the last date on which you have been active on our Website or contacted us via email/phone call.
- The exemption to this period is any DBS certificates, which are only held for a 6 month period (details relating to these certificates are kept for the full 7 years to demonstrate our legitimate awarding of the DBS-checked status).
- Records that you have shared publicly or with another User (e.g. reviews you leave, messages you send and bookings you make) may remain on the Website after your personal information has been deleted, but will no longer have identifying information which links them to you attached.
- We may retain records where necessary to fulfil our regulatory or statutory duties.

Use of Cookies

Cookies are small bits of text that are downloaded to your computer or mobile device when you visit a Website. Your browser sends these cookies back to the Website every time you visit the site again, so it can recognise you and can then tailor what you see on the screen. We use cookies for two main purposes:

- For the site to operate we use cookies to, for example, save login information, record when you have returned to the site, and during the booking and payment processes.
- For analytical purposes to record visits to the site, to see how visitors navigate through the site, and to record which pages have been visited. We may use third party cookies for this purpose.

You may block cookies by activating a setting on your browser that allows you to refuse the setting of all or some cookies. By doing so, you may not be able to access all or parts of our site. For more information please read the advice at [AboutCookies.org](https://www.aboutcookies.org).

Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the below.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

To ensure that we can deal with your request as promptly as possible, please ensure you make your request as clearly as possible.

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 may refuse to comply with your request in these circumstances.

You have the right to request that we send to you or to another organisation, an electronic copy of the personal data we hold about you in a structured, commonly used and machine-readable format, for example when you are dealing with a different service provider.

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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests.

Changes to our Privacy Policy

Any changes to our Privacy Policy will be posted to the Website and, where appropriate, via e-mail.

Contacting Us

Please do not hesitate to contact us regarding any matter relating to this Privacy and Cookies Policy via email at info@brightteach.com.
