

**Optimal Tutors Limited** Registered Office, Optimal Tutors, Optimal House 11A Memorial Road, Walkden Town Centre, M28 3PX/ Registered in England and Wales / Company Number 08423171

Optimal Tutors maintains a strict policy of client confidentiality. This policy relates to all information you provide to Optimal Tutors and all data that Optimal Tutors holds in relation to your use of the site. It supplements and is in addition to the Terms and Conditions and should be read in conjunction with them.

### What do we collect?

**Registration and student details (for Clients):** This includes details such as your name, email address, address, telephone number, your child's name, your child's date of birth and your child's educational background.

**Details (for Tutors/Teachers):** Name, telephone number, email address and details of relevant teaching / tutoring experience. We may also store your bank details for the purpose of making payments to you for your work at our learning centre or outside

**Visitor tracking information:** We use Google Analytics to track your visit on the Keystone site. This includes but is not limited to visitor numbers, length of time on the site, visitor location, any 3rd party website that you came to the Website from or any 3rd party website that you went to from the Keystone site.

#### Cookies: See below

What do we do with your information?

Your data may be used without limitation for the following purposes:

- to improve Optimal Tutors;
- to ensure we deliver a good service to clients and tutors;
- internal data analysis;
- to notify you of any changes to Optimal Tutors' service; and
- to be kept informed for marketing purposes we may contact you by email.
  In these instances clear directions will be given of how to unsubscribe from any correspondence.

## **Sharing information with third parties**

Clients: After clients have registered with us we will share the broad requirements of the assignment on an anonymous basis with the tutors at our learning centre so that we can best know how to meet your needs. We may choose to provide further information about our tutors to parents/students on request. If a client chooses to proceed with us, we will pass on the specific registration and student details to the tutor so that the tutor knows what the tutoring requirements are and so that the tutor can prepare for the assignment. Other than this, we will keep your personal information confidential within our group of companies and not pass it on to any 3rd parties unless we are required to do so by law.

**Tutors:** The information that you provide to Optimal Tutors forms the basis of a tutor profile. This includes the following information: a photograph, the subjects that you teach, your teaching experience, personal biography and your personal teaching approach. Some of your profile information including photograph will be published on the Optimal Tutors website under "Our Team". Optimal Tutors may share your profile with prospective clients in certain cases. Other than sharing information with our clients we will keep your personal information confidential within our group of companies and not pass it on to any 3rd parties unless we are required to do so by law.

# Transfers of Data Outside the UK/EEA

Your personal data may be transferred to countries outside the UK or European Economic Area that may not have the same laws to protect your data. This may occur for example if our computer servers are hosted outside of the UK/EEA or if we have a client enquiry from outside the UK/EEA. You should not submit any personal data unless you accept this position.

### How do we keep your information safe?

We take reasonable steps to ensure that your information is kept safe and will endeavour to protect it from unauthorised access. Your information will only be kept for a commercially reasonable period of time for the purposes stated above.

## **Cookies**

We occasionally issue session cookies when strictly necessary for the operation of the website (such as logging into our member account area). These cookies do not hold any personal information. You can find out more about <a href="what cookies are, how to control them and delete them here">what cookies are, how to control them and delete them here</a>. Google Analytics and third party services such as Google Maps, Twitter and Facebook may issue cookies. <a href="Further information on Google Analytics and Privacy can be found here">Further information on Google Analytics and Privacy can be found here</a>. You are welcome to opt-out of receiving cookies from us or third parties services at any time using the settings in your browser.

## Access to your data

You have the right to request a copy of all personal information that we hold about you. For such requests we charge an administrative fee of £10 and we will make information available within 28 days.

### **Email tracking**

Our newsletters employ tracking so that we can monitor at an individual level whether a recipient has opened the email and what content they have clicked on. We only send our newsletter to recipients who have subscribed via our website or who are a current client. Recipients are able to easily unsubscribe from the newsletter if they wish.

### **Social Buttons**

On the website you will see 'social buttons'. There are buttons for: Facebook and Youtube. To implement these buttons onto a website and connect them to the relevant external sites, a script from outside your website is used. It is likely that these sites are collecting information about what your visitors are doing on your site, so if a visitor clicks the button these sites will register this information. You should check the privacy policies of these sites to see how they use your information.

### Third party sites

We link to a number of other websites on our site. We are not responsible in any way for the privacy policies of these sites nor for the way in which they may use the information they collect about you.

# **Changes to this policy**

This policy may be changed or amended at our absolute discretion, so you should review it from time to time so you are aware of any changes. Any changes will be posted on the website.

### **Contact**

If you have any questions, please contact us using the details on the contact page