



## Privacy Notice

This privacy notice tells you how we look after your information when you visit our website at <https://paideialondon.com/> or use our online platform (as a young learner or adult with parental responsibility for a young learner).

It explains what information we collect about you, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns.

We sometimes need to make changes to this notice, to reflect changes in the way we do business or updates in the law. We will notify you of any important changes before they take effect.

### 1. Who we are and other important information

We are Paideia Education Ltd registered in England and Wales with company number 11807039 whose registered address is Flat 32, One Britton St, London, United Kingdom, EC1M 5NW (**Paideia, we, us or our**).

Paideia is the **controller** for your information (which means we decide what information we collect and how it is used).

We are registered with the Information Commissioner's Office (**ICO**), the organisation responsible for ensuring that we follow the law when we use your information, under number [ZA878088](#).

#### Respecting our young learners and their information

Children have the same legal rights to their information as adults do.

If you are one of our young learners then you should know that the adult who has parental responsibility for you (that might be your mum or dad, but it could also be another adult who looks after you, who we call the **responsible adult**) can ask us about your information.

If you are ever worried or have questions please let us (or another adult you trust) know. You can use <https://wa.me/447584690665> to message us via WhatsApp. We are here to encourage young learners – so we are always happy to answer your questions!

#### How to contact us

If you have any questions about this privacy notice or the way we use information, please get in touch using the following details:

Contact Name: Isabelle Waring  
Email Address: [isabelle@paideialondon.com](mailto:isabelle@paideialondon.com)

### 3. The information we collect about you

**Personal data** means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect and where we receive it from below:

## Young Learners' personal data – general

## Received from



**Identity** – name, date of birth, gender, language

- young learner
- responsible adult



**Contact details** – email address, home address

- young learner
- responsible adult



**Education** – top three preferred schools, current school, exam scores

- young learner
- responsible adult

## Young Learners' personal data – online account holders

## Received from



**Account** – username, password, preferences (including language), chat logs, modules completed, scores on quizzes, videos watched

- young learner
- young learner (via cookies and similar things)
- responsible adult
- tutors



**Zoom** – link and password to online session, messages sent in chat function, display name, sound and picture from webcam and microphone

- young learner
- young learner (via cookies and similar things)
- responsible adult
- tutors
- any other person who may appear in background of young learner webcam



**Feedback** – responses you give when you rate how much you enjoyed a lesson or like our website

- young learner



**Technical information** – about the phone or device you used to visit our website or log into our online platform

- young learner (via cookies and similar things)



**How you use our website and online platform** – how often you visit our website, which pages you view and for how long and how you use our online platform (e.g. which types of content you viewed and for how long and what options you choose)

- young learner (via cookies and similar things)

## Young Learners' personal data – private tutoring

## Received from



**Session information** – help you'd like to receive from Paideia, the school you hope to attend and anything else you tell us during a private tutoring session

- young learner
- responsible adult

## Responsible adults' personal data



**Identity** – name, date of birth, gender, language



**Contact** – email address, telephone number, home address



**Financial** – bank account and sort number



**Account** – username, password, preferences (including language), chat logs



**Feedback** – information and responses you provide when completing surveys and questionnaires



**Marketing Data** – information you submit to confirm whether you wish to receive marketing from us and which method you prefer to be contacted by (e.g. text, email)



**Technical information** – about the phone or device you used to visit our website or log into our online platform



**How you use our website and online platform** – how often you visit our website, which pages you view and for how long and how you use our online platform (e.g. which types of content you viewed and for how long and what options you choose)

## Website visitors' personal data



**Marketing Data** – information you submit to confirm whether you wish to receive marketing from us and which method you prefer to be contacted by (e.g. text, email)



**Technical information** – about the phone or device you used to visit our website or log into our online platform



**How you use our website and online platform** – how often you visit our website, which pages you view and for how long and how you use our online platform (e.g. which types of content you viewed and for how long and what options you choose)

## School important contacts' personal data



**Identity** – name, job title, employer (name of the school)



**Contact details** – work email address and telephone number

#### 4. How we use your information

Paideia must show it has a legal reason (also known as a **lawful basis**) for collecting and using your personal data. There are six legal reasons which organisations can rely on. The ones Paideia rely on to use your personal data are:

- we need to use your information to do something that we've agreed to do, or require you to do something that you've agreed to do, under any agreement between us, for example, under the terms that apply when you use our online platform or consultancy services (**contract**)
- you (the responsible adult or website visitor) have given us permission to use yours or your child's information for a specific reason (**consent**)
- we need to use your information to comply with the law (**law**)
- we need to use your information where we've a good reason for doing so, if we're sure that you would expect this, and that your rights won't be affected (**good reason**, which is also known as **legitimate interests**)

This table explains which legal reason we rely on for which activity. If we plan to use your personal data for a new reason that is not listed in the table, we will update our privacy notice and send you a notification.

Activity	Personal data used	Legal reason
Taking steps to enter into the contract with the responsible adult	 	Performance of contract (with responsible adult) Legitimate interests (for use of young learners' personal data, as necessary to conclude our contract with the responsible adult)
Communicate with important school contacts	 	Legitimate interests (as necessary to provide our consultancy services)
Processing payments and collecting and recovering monies owed to us	  	Performance of contract Legitimate interests (as necessary to recover debts due to us)
Handling requests for technical support	    	Performance of contract (requests from responsible adult) Legitimate interests (requests from young learners, as necessary to perform our contractual obligations to provide technical support)
Administering and protecting our website, online platform and systems (and those of our supply chain)	  	Legitimate interests (necessary to provide our products and services, monitor and improve network security and prevent fraud)

Providing insight on how a young learner is using our online platform



Performance of contract (with responsible adult)  
Legitimate interests (to provide an overview to responsible adults of young learners' engagement with the online platform)

Sending you marketing communications by email



Consent (responsible adult and website visitors)

Asking you to participate in surveys and other types of feedback



Legitimate interests (necessary for product and service improvement purposes)

Notifying you about changes to our privacy notice



Legal obligation (necessary to comply with our obligations under data protection law)

## 5. Marketing

Our marketing messages always include a link so that you can unsubscribe at any time.

We never intentionally market to young learners. If you are a young learner and you receive a marketing message (this might include some prices or information about discounts) please tell us or your responsible adult so we can stop straight away.

## 6. Who we share your information with

We share (or may share) your personal data with:

- **Our personnel:** Paideia employees (or other types of workers) who have contracts containing confidentiality and data protection obligations. Any personnel whose role may require them to interact with young learners is required to undergo a DBS check.
- **Responsible adults:** we share information about young learners with the responsible adult registered to the account.
- **Schools:** Where a young learner or responsible adult may wish to attend a school, we share information about that school, key contacts at that school and any information they provide to us. We'll also share information about the young learner or responsible adult if they ask us to help with any admission application or process.
- **Our technical service providers:** other organisations help us provide our services such as Nginx who host our Website and Zoom who we use for live sessions. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- **Regulatory authorities:** such as HM Revenue & Customs, the UK tax authority
- **Strategic partners:** any academies, exam boards, language boards or other organisations that we may partner with
- **Our professional advisers** such as our accountants or legal advisors where we require specialist advice to help us conduct our business
- **Any actual or potential buyer of our business**

If Paideia were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

## 7. **Where we keep your information**

We keep your information on big computers that can be accessed over the Internet called 'servers'. These belong to other organisations. Most of the servers we use are based somewhere in the UK or Europe, but some of these servers may be based in other countries.

Where any servers are based outside the UK or Europe, we make sure that the organisations which own them agree to follow similar rules to us when it comes to how your information is handled.

## 8. **How we keep your information safe**

We do lots of different things to make sure that your information is safe:

- making sure that the link between your phone or device and our servers is secure so that no-one can 'listen in' on us
- using strong passwords on all our systems
- only allowing a small group of people to access our systems
- entering into agreements with our staff and service providers which require them to keep your information safe and not share it with anyone
- having a plan in place to deal with what happens if your information is accessed by someone who shouldn't have access to it or if your information is lost or changed in any way

We know that online safety can be a worry so we publish links to trusted content (e.g. government guidance or national charities' awareness campaigns) so you can learn more about how to keep yourself, your loved ones and your information safe.

If you notice anything strange on your account (or believe your account has been used by someone without your permission) please let us know by emailing us at [customercare@paideialondon.com](mailto:customercare@paideialondon.com).

## 9. **How long we keep your information**

We only keep personal data for as long as we need it to complete the activities we collected it for (described in the table above).

To decide how long to keep personal data (also known as its **retention period**), Paideia considers the how much, what type and how sensitive the personal data is, the potential risk of harm to you if something went wrong, whether we need the personal data to do our activities or whether we can do those activities another way (e.g. by using anonymous information instead), and any laws we must abide by (e.g. minimum accounting records for HM Revenue & Customs).

## 10. **Your legal rights**

You have specific legal rights in relation to your personal data.

Adults and children have the same rights, but adults can also act on behalf of the children they have parental responsibility for.

We don't charge you anything to exercise (use) your rights, although we are sometimes allowed to – if this happens we'll let you know first.



**Access (get a copy of):** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law



**Correct:** You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



**Delete:** You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.



**Restrict (stop or limit):** You can ask us to restrict how we use your personal data and temporarily limit the way we use it (e.g. whilst you check that the personal data we hold for you is correct)



**Object (say no):** You can tell us you want us to stop using your personal data. We will always stop if you ask us to stop sending you marketing communications but in other cases, we decide whether we will continue. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



**Transfer:** You can ask us to send you or another organisation an electronic copy of your personal data



**Complaints:** If you are unhappy with the way we collect and use your personal data, you can complain [to the ICO](#) but we hope that we can help first.

If you wish to make any of the right requests listed above for yourself or on behalf of a young learner, you can reach us at [customercare@paideialondon.com](mailto:customercare@paideialondon.com).

## 11. What are cookies?

We use cookies and similar things (such as beacons and pixels) on our website and online platform.

Cookies are small text files stored on your phone or device and are used to ensure our website works as it should and help us tell you apart from other visitors to our website.

To find out more about cookies, how to refuse them and how to change your phone or device's cookie settings, you should read the [ICO Cookie Guidance](#).

## 12. What do Paideia use cookies for?

We use cookies to:

- to track how you use our online platform or website
- to check whether you have seen specific messages we display
- to record the conversation thread when you use any chat function within live sessions
- to record your answers to surveys and questionnaires on our online platform while you complete them
- to keep you signed into our online platform
- where we post content and links to content, we use cookies to capture and analyse information such as number of views and shares

The cookies and similar tools we use are:

Identifier	Set by	What it does	When it gets deleted	Further information
wc_cart_hash	WooCommerce	Used by our e-commerce tool (WooCommerce) to determine when cart contents/data changes	When you close your browser or visit another website in the same tab	See the <a href="#">Automatic Privacy Policy</a>
wc_fragments	WooCommerce	Used by our e-commerce tool (WooCommerce) to remember the contents of your 'shopping cart#	When you close your browser or visit another website in the same tab	See the <a href="#">Automatic Privacy Policy</a>
woocommerce_items_in_cart	WooCommerce	Used by our e-commerce tool (WooCommerce) to determine when cart contents/data changes.	When you close your browser or visit another website in the same tab	See the <a href="#">Automatic Privacy Policy</a>
Elementor	Elementor	Used by Elementor, a tool that we use to build pages on our website, to track how many pages using its plugin are viewed on the internet	It is never deleted	See the <a href="#">Elementor Privacy Policy</a>
APISID, HSID, NID, SAPSID, SID, SIDCC, SSID, _Secure-3PAPISID, _Secure-3PSID, _Secure-3PSIDCC	Google	These cookies are used by the Google reCAPTCHA tool and also Google Ads network to deliver personalised advertising	Most of these cookies are stored for 6 months or 2 years	See the <a href="#">Google Privacy Policy</a> and <a href="#">How Google uses cookies explainer</a>