

Privacy Notice

Anna Miller Education

This Privacy Notice explains how Anna Miller Education collects, uses, shares, and protects personal data in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

I am committed to safeguarding the privacy and security of personal information provided to me in the course of my tuition services.

1. Data Controller

1. Anna Miller is the data controller responsible for the processing of personal data. If you have any questions or concerns regarding the processing of your personal data, please contact Anna Miller Education using the details provided at the end of this policy.

2. Legal Basis for Processing

1. I process personal data based on one or more of the following legal bases:
 1. Performance of a Contract: Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
 2. Legitimate Interests: Processing is necessary for our legitimate interests or the legitimate interests of a third party, provided that such interests are not overridden by your interests or fundamental rights and freedoms.
 3. Compliance with Legal Obligations: Processing is necessary for compliance with a legal obligation to which we are subject.
 4. Consent: Processing is based on your consent, which you may withdraw at any time.

3. Information I May Collect

1. I collect and process various types of information, including personal data, for the following purposes:
 1. Contact information (such as name, address, email address, and telephone number) to communicate with you regarding tuition services and to schedule sessions.

2. Student information (such as name, age, current and predicted attainment, SEND e.g. EHCPs, IEPs and professional reports and vital medical information e.g. allergies) to tailor tuition sessions to individual student needs, monitor progress and ensure student safety.
3. Photos/videos of students' work and progress (no faces) to celebrate educational progress and for promotional purposes.

4. Use of Information

1. I use the information I collect for the following purposes:
 1. To provide tuition services and fulfil my contractual obligations towards students, parents/guardians, schools/local authorities and/or other organisations to whom I deliver tuition services.
 2. To communicate with students, parents/guardians, tutors, teachers (where applicable) regarding tuition sessions, scheduling, updates, and feedback.
 3. To monitor student progress and academic attainment and provide feedback and support as necessary.
 4. To comply with legal and regulatory requirements, including record-keeping, reporting, and safeguarding obligations.
 5. To improve tuition services, develop new programs, and enhance the overall learning experience.
 6. To celebrate progress and share learning suggestions.

5. Sharing of Information

1. I may share personal information with the following:
 1. Parents/Guardians: I may share student information with parents/guardians to provide updates, feedback, and progress reports.
 2. A person's carer, or next of kin: When working with vulnerable adults, I may share information with a person's carer or next of kin to provide updates, feedback or progress reports.
 3. Schools: I may share information relating to students with schools and teachers either where the school has contracted me to deliver tuition services to one or more of their students, or where a Parent/Guardian for the student has given me their consent, in writing, to share information with the student's school.

4. Regulatory Authorities: I may disclose information to regulatory authorities or law enforcement agencies as required by law or to protect my legal rights.
5. Social media: Student photos and videos (no faces) and student work may be uploaded to Facebook or Instagram only with the parent/guardian's express written consent.
2. Anna Miller Education does not sell or rent personal information to third parties for marketing purposes.

6. Media and data consent

I would like to celebrate student progress and share learning strategies. I may occasionally do this by taking and sharing photos, videos or showcasing students' work on Facebook or Instagram for educational and promotional purposes. Your privacy will be protected, and I will only capture or publish media with your explicit written consent. Please review the options below:

No permission: I do not consent to any photos or videos being taken or shared under any circumstances.

Internal use only: I consent to photos/videos being taken (no faces) only for internal progress updates sent directly to parents/guardians, but not for public social media use.

Limited permission (no faces): I consent to photos/videos being taken, but only of student work, or from behind the shoulder (no identifying facial features).

Clients/parents/guardians will be asked to state their preference for data and media consent by completing the Terms and Conditions Contract.

Parents/guardians retain the right to withdraw consent at any time. To request removal of an image, please contact Anna Miller in writing and the media will be removed within 48 hours.

7. Data Retention

1. I retain personal information for as long as necessary to fulfil the purposes for which it was collected, including any legal, accounting, or reporting requirements. The specific retention period for personal data may vary depending on the nature of the data and the purposes for which it is processed.

8. Data Subject Rights

1. Under applicable data protection laws, you have certain rights regarding your personal data, including:

1. **Right of Access:** You have the right to request access to your personal data and information about how it is processed.
 2. **Right to Rectification:** You have the right to request the correction of inaccurate or incomplete personal data.
 3. **Right to Erasure:** You have the right to request the deletion of your personal data under certain circumstances.
 4. **Right to Restriction of Processing:** You have the right to request the restriction of processing of your personal data under certain circumstances.
 5. **Right to Data Portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another data controller.
 6. **Right to Object:** You have the right to object to the processing of your personal data under certain circumstances, including processing for direct marketing purposes.
 7. **Right to Withdraw Consent:** If processing is based on your consent, you have the right to withdraw your consent at any time.
2. To exercise any of these rights, or if you have any questions or concerns about the processing of your personal data, please contact Anna Miller Education using the details provided at the end of this notice.

9. Data Security

1. I implement appropriate technical measures and adopt relevant policies and processes, to protect the security and confidentiality of personal information. Data will be stored on OneDrive and Google Drive. Data will be stored on accounting software for the purposes of HMRC auditing. Data will be kept secure by utilising access controls, to include encryption and 2-factor authentication. However, please note that no method of transmission over the internet or electronic storage is 100% secure, and I cannot guarantee absolute security.
2. Parents/guardians will be required to give permission for me to hold special category data and data relating to children (under the age of 18) and vulnerable adults. I will record the name of the person who gave consent for data to be stored and their relationship to the child or vulnerable adult. ("Sensitive Data") that is collected and processed in accordance with this policy shall be subject to the following additional safeguards:
 1. I will review where Sensitive Data is stored periodically and at least every three (3) months to ensure that it is appropriately secured and protected.

2. I will maintain robust processes that govern the access to and retrieval of Sensitive Data, which shall include:

- What Sensitive Data is permitted to be used for (which shall be restricted only to that use which is reasonably necessary for me to discharge my contractual and/or statutory duties);
- What processing takes place when Sensitive Data is retrieved, including guidelines about what copies might be made, what they will be used for and where they will be stored.

3. In the event that there was to be any data breach of any kind (either suspected or known), I will undertake to:

- Immediately take action to assess and mitigate the extent of any such breach.
- Take steps to promptly assess what data has been, or may have been, compromised.
- Inform data subjects of the data breach, using clear language.
- Take any measures that may be necessary to prevent compromised data being used by an unauthorised third party (e.g. recommending to data subjects that they change passwords that may have been compromised).
- Contact the ICO within 72 hours should there be a significant data breach. Written records of any such data breaches will be kept.
- Where appropriate, I will keep data subjects informed of any change to the level of risk I assess exists, as a result of any such breach.

10. Privacy and Electronic Communications: (PECR) The PECR sits alongside the Data Protection Act and GDPR. The PECR gives people specific privacy rights in relation to electronic communications. I will ensure I gain a person's specific consent should I wish to send them a marketing message. Consent will be gained by requesting a person tick an opt-in box to confirm they are happy to receive marketing communications. I will keep clear records of when consent was given. A person can withdraw their consent to receive marketing communications at any time. This can be done by contacting Anna Miller Education using the contact details at the end of this Notice.

11. Changes to this Privacy Policy

1. I reserve the right to update or modify this Privacy Policy at any time. Any changes will be effective immediately upon posting the updated Privacy Policy on my website. I encourage you to review this Privacy Policy periodically for any changes.

12. Contact

1. If you have any questions or concerns about this Privacy Policy or data practices, or if you wish to exercise your data subject rights, please contact Anna Miller Education at:

AnnaMillerEducation.co.uk

Anna@annamillereducation.co.uk

07960086355

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