

Privacy (GDPR) Policy

1. Introduction

This Privacy Policy explains how Clever Clogs Academy ("we," "us," or "our") collects, uses, shares, and protects personal data in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are committed to safeguarding the privacy and security of personal information provided to us by students, parents, tutors, and staff.

Data Controller Details:

Name: Clever Clogs Academy
Address: 41 Turnham Close, Winslow, Bucks, MK18 3GQ
ICO Registration Number: ZB500833
Data Protection Contact: Mathew McArthur (contact@cleverclogsacademy.com)

2. Legal Basis for Processing

We process personal data based on one or more of the following legal bases:

- **Tutor-Client Contract:**** Processing is necessary to deliver the tuition services you have requested (e.g. scheduling lessons, invoicing).
- **Legal Obligation:**** Processing is necessary to comply with the law (e.g. safeguarding children, tax reporting to HMRC).
- **Legitimate Interests:**** Processing is necessary for running our business effectively (e.g. marketing to existing clients, improving our services), provided this does not override your rights.
- **Consent:**** Where you have given clear consent for a specific purpose (e.g. using photos for marketing). You may withdraw this consent at any time.

3. Information We Collect

We collect and process the following types of personal data:

- **Contact Information:**** Names, addresses, email addresses and telephone numbers of students and parents/guardians.
- **Student Education Data:**** Age, school year, current attainment levels, exam results and progress notes to tailor tuition sessions.

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3. Information We Collect (Continued)

The following specific and sensitive data points are also collected:

- **Special Category Data (Health & Welfare):**** We collect data on medical conditions, allergies and disabilities (SEND). We process this under Article 9(2)(b) (social protection/safeguarding) and Article 9(2)(h) (provision of health or social care) to ensure the safety of students and adapt teaching methods.
- **Emergency Contacts (Third Party Data):**** Names and phone numbers of emergency contacts who are not the parents.
Note: If you provide us with details of a third party, you confirm that you have informed them that you are sharing their data with us.
- **Tutor Information:**** Qualifications, DBS certificate numbers and employment history for staff/contractors.
- **Financial Data:**** Payment records and bank details (where applicable) for invoicing.

4. How We Use Your Information

- Deliver high-quality tuition and monitor student progress.
- Schedule sessions and communicate updates to parents/guardians.
- Ensure the safety and wellbeing of students (Safeguarding).
- Comply with legal and regulatory requirements (e.g. Keeping Children Safe in Education).
- Process payments and maintain accounts.

5. Sharing of Information

We treat your data with strict confidentiality. We may share personal information with:

- **Tutors:**** Relevant student information (learning needs/progress) is shared with the specific tutor delivering the lesson.
- **Schools:**** We may share progress reports with a student's school only if we have the written consent of the parent/guardian.
- **Service Providers:**** We use trusted third-party software to help us run our business. These processors act on our instructions and include:
 - Online Tuition Platforms: (e.g. Zoom, Microsoft Teams).
 - Cloud Storage & Admin: (e.g. Google Drive, Dropbox, Microsoft 365).
 - Accounting Software: (e.g. Xero, QuickBooks).
- **Authorities:**** We may disclose information to the Local Authority, Police, or Safeguarding Partners if we have a concern about a child's welfare, or to HMRC for tax purposes.

We do not sell or rent personal information to third parties for marketing purposes.

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6. Data Retention

We only keep your data for as long as necessary. We adhere to the following retention schedule:

Data Type	Retention Period	Reason
General Student Records	1 year after tuition ceases	To answer follow-up queries or re-registration.
Financial Records	6 years from year end	Compliance with HMRC tax laws.
Safeguarding Records	Until child reaches 25	Standard educational safeguarding practice.
Accident/Injury Records	Until child reaches 21	Limitation Act 1980 (Personal Injury).
Staff/Tutor Records	6 years after employment	Compliance with employment law.

Once these periods expire, data is securely deleted or shredded.

7. International Transfers

Some of our third-party service providers (e.g. video conferencing tools or cloud storage) may process data on servers outside the UK/EEA (e.g. in the USA). Whenever we transfer personal data internationally, we ensure it is protected by appropriate safeguards, such as the UK Government's International Data Transfer Agreement (IDTA) or by ensuring the provider adheres to the UK-US Data Bridge framework.

8. Your Rights

Under the UK GDPR, you have the right to:

- **Access:**** Request a copy of the personal data we hold about you or your child (Subject Access Request).
- **Rectification:**** Request correction of inaccurate or incomplete data.
- **Erasure:**** Request deletion of your data ("Right to be forgotten") where there is no good reason for us to continue processing it.
- **Restriction:**** Request that we suspend processing your data.
- **Objection:**** Object to processing where we are relying on a legitimate interest.

To exercise any of these rights, please contact Mathew McArthur at the address below.

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9. 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. This includes password protection, encryption and limiting access to personal data to those employees and tutors who have a business need to know.

10. Contact Us

If you have any questions about this policy or our privacy practices, please contact:

Clever Clogs Academy
41 Turnham Close, Winslow, Bucks, MK18 3GQ
Email: contact@cleverclogsacademy.com
Phone: 01296 711786

Last updated: October 2025

Signed: _____ Date: October 2025

Name: Mathew McArthur

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