

Privacy Policy

1. Introduction

This Privacy Policy details how Tutorbloc Ltd ('us', 'we'), collect, use and process personal data. If you have any questions about this Privacy Policy or otherwise relating to how we process your personal data you can contact us at hello@tutorbloc.com.

This Privacy Policy affects your legal rights and obligations so please read it carefully. If you do not agree to be bound by this Privacy Policy, please do not provide your personal data to us. We may update this Privacy Policy from time to time at our discretion and in particular to reflect any changes in applicable laws. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, you are responsible for regularly reviewing this Privacy Policy so that you are aware of any changes.

We are the controller of the personal data provided to us for the purposes of applicable data protection legislation.

2. Whose personal data do we collect?

By personal data we mean identifiable information about you, such as your name, email address, postcode, mobile number, photos & videos from your camera and your IP address. Although the App enables payment services between Tutors and Clients, these services are provided by our payment service provider, currently Stripe, and we do not therefore process any financial data.

From time to time you may provide us personal data; either to us directly, or to us through our social media platforms. This may be because you wish to:

- provide services to us;
- use our software either as a Tutor or a Client;
- or otherwise contact us including with queries, comments or complaints.

We shall process all such personal data in accordance with this Privacy Policy. Certain personal data is mandatory to be provided to us in order that we can fulfil your request, for example, to create an account with us — we shall make this clear to you at the point of

collection of the personal data. Further, Tutors are required to provide a copy of their Enhanced DBS certificate to complete their registration with us, so we may process personal details applicable to this document and after 6 months, we destroy this document. Similarly, we may process personal details displayed on identity documents provided to us as part of the registration process. All personal data that you provide to us must be true, complete and accurate. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this and we may also report this to the appropriate authorities.

When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone calls we have with you. When you use our App, we automatically collect and store information about your device and your activities.

This information could include:

- your preferences and settings such as time zone and language;
- technical information about your device such as browser/operating system;
- how long you used the App and which services and features you used.

Some of this information is collected using cookies and similar tracking technologies; this helps us to maintain, improve and analyse the services we provide. We may also receive personal data about you from our security partners and our payment providers.

3. Lawful use of your personal data

We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are:

- consent (where you choose to provide it);
- performance of our contract with you;
- compliance with legal requirements; and
- legitimate interests.

When we refer to legitimate interests we mean our legitimate business interests in the normal running of our business which do not materially impact your rights, freedom or interests. We shall use your personal data to provide access to our App in accordance with the contract between us, namely our [Terms](#).

We may from time to time need to use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety. We may also use your personal data for our legitimate interests including to improve our services and in

connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company; to deal with any customer services you require; for audit purposes and to contact you about changes to this Privacy Policy.

4. Who do we share your data with?

For our legitimate interests, we will share your personal data with our payment provider Stripe. We may also share your personal data with sub-contractors and agents that are appointed to perform functions on our behalf and in accordance with our instructions, including IT service providers, accountants, auditors and lawyers. We shall provide our service providers, sub-contractors and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we shall request that they delete your personal data or make it anonymous. We also use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

5. Where we hold and process your personal data

Some or all of your personal data may be stored or transferred outside of the European Economic Area (the EEA) for any reason, including for example, if our email server is located in a country outside the EEA or if any of our service providers are based outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data or to a third party where we have approved transfer mechanisms in place to protect your personal data – i.e. by entering into the European Commission’s Standard Contractual Clauses, or by ensuring the entity is Privacy Shield certified (for transfers to US-based third parties).

6. Security

We shall process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. In particular, access is restricted to employees who need to know your personal data, and we use appropriate password protection and appropriate strong encryption electronic measures within our electronic data management systems. However, unfortunately, because of the nature of electronic storage, we cannot promise that your personal data or any other data you provide to us will always remain secure. If there is a security breach, we will do all that we can as soon as we can to stop the breach and minimise the loss of any data.

7. Marketing

If we do send marketing emails, we will first obtain your consent. You may change your mind at any time and choose to no longer receive marketing emails from us by contacting us or clicking unsubscribe from a marketing email. Please note that it may take us a few days to update our records to reflect your request. If you ask us to remove you from our marketing list, we shall keep a record of your name and email address to ensure that we do not send to you marketing information but continue to send account information.

8. Your rights

You have a number of rights under applicable data protection legislation. Some of these rights are complex, and not all of the details have been included below.

- Right of access: You have the right to obtain from us a copy of the personal data that we hold for you.
- Right to rectification: You can require us to correct errors in the personal data that we process for you if it is inaccurate, incomplete or out of date.
- Right to portability: You can request that we transfer your personal data to another service provider.
- Right to restriction of processing: In certain circumstances, you have the right to require that we restrict the processing of your personal information.
- Right to be forgotten: You also have the right at any time to require that we delete the personal data that we hold for you, where it is no longer necessary for us to hold it. However, whilst we respect your right to be forgotten, we may still retain your personal data in accordance with applicable laws.
- Right to stop receiving marketing information: You can ask us to stop sending you information about our services, but please note we shall continue to contact you in relation to any matters relating to your account.

We reserve the right to charge an administrative fee if your request in relation to your rights is manifestly unfounded or excessive. If you have any complaints in relation to this Privacy Policy or otherwise in relation to our processing of your personal data, please let us know. We shall review and investigate your complaint and try to get back to you within a reasonable time. You can also contact the Information Commissioner (www.ico.org.uk) or if you are based outside of the United Kingdom, please contact your local regulatory authority.

9. Retention of personal data

Subject to the provisions of this Privacy Policy, we will retain personal data in accordance with applicable laws. In particular, we shall retain your personal data for as long as you access or use our services. However, we may also be required to retain personal data for a particular period of time to comply with legal, auditory or statutory requirements, including requirements of HMRC in respect of financial documents.

10. General

If any provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid or unenforceable, then such provision shall be construed, as nearly as possible, to reflect the intentions of the parties and all other provisions shall remain in full force and effect. This Privacy Policy shall be governed by and construed in accordance with English law and you agree to submit to the exclusive jurisdiction of the English Courts.