Data Protection – CTC Privacy Policy

Introduction

Our privacy policy will help you understand what information we collect at CTC, how CTC uses it, and what choices you have.

When we talk about "CTC," "we," "our," or "us" in this policy, we are referring to Cambridge Tutors College, the organisation which provides the Services. When we talk about the "Services" in this policy, we are referring to our online workplace and platform. Our Services are currently available for use via a web browser or applications specific to your desktop or mobile device.

Information we collect and receive:

1. Admissions Data

Content and information submitted by applicants to CTC is referred to in this policy as "Customer Data." As further explained below, Customer Data is controlled by the organisation. Where CTC collects or processes Customer Data, it does so on behalf of the Customer. Here are some examples of Customer Data (but keep in mind they are only examples and there may be others): online application forms, messages, pictures, videos, edits to messages or deleted messages, and other types of files. Some of this data may be seen as sensitive, such as first and last name, gender, a photo and a phone number. Once you join CTC and log onto a parent/guardian or student account you join our community and create a user account, you are a "user," as further described in the User Terms of Service. As you are using the Services by invitation you as the Customer determines your own policies regarding storage, access, modification, deletion, sharing, and retention of your Customer Data which may apply to your use of the Services.

2. Other information

CTC may also collect and receive the following information:

• Account creation information. Users provide information such as an email address and password to create an account.

•Billing and other information. For Customers that pay fees our third party payment processors may collect and store billing address and credit card information on our behalf or we may do this ourselves.

• Services usage information. This is information about how you are accessing and using the Services, which may include administrative and support communications with us

• Log data. When you use the Services our servers automatically record information, including information that your browser sends whenever you visit a website or your mobile app sends when you are using it. This log data may include your Internet Protocol address, the address of the web page you visited before using the Services, your browser type and settings, the date and time of your use of the Services, information about your browser configuration and plug-ins, language preferences, and cookie data.

• Device information. We may collect information about the device you are using the Services on, including what type of device it is, what operating system you are using, device settings, application IDs, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings.

Our Cookie Policy

CTC uses cookies and similar technologies like single-pixel gifs and web beacons, to record log data. We use both session-based and persistent cookies.

Cookies are small text files sent by us to your computer and from your computer or mobile device to us each time you visit our website or use our desktop application. They are unique to your account or your browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them or until they expire.

Some cookies are associated with your account and personal information in order to remember that you are logged in and which teams you are logged into. Other cookies are not tied to your account but are unique and allow us to carry out site analytics and customisation, among other similar things. If you access the Services through your browser, you can manage your cookie settings there but if you disable some or all cookies you may not be able to use the Services.

CTC sets and accesses our own cookies on the domains operated by CTC and its corporate affiliates. In addition, we use third parties like Google Analytics for website analytics. You may opt-out of third party cookies from Google Analytics on its website. We do not currently recognize or respond to browser-initiated Do Not Track signals as there is no consistent industry standard for compliance.

How we use your information

We use your information to provide and improve the Services.

1. Customer Data

CTC may access and use Customer Data as reasonably necessary and in accordance with Customer's instructions to (a) provide, maintain and improve the Services; (b) to prevent or address service, security, technical issues or at a Customer's request in connection with customer support matters; (c) as required by law or as permitted by the Data Request Policy and (d) as set forth in our agreement with the Customer or as expressly permitted in writing by the Customer.

2. Other information

We use other kinds of information in providing the Services. Specifically:

- To understand and improve our Services. We carry out research and analyse trends to better understand how users are using the Services and improve them.
- To communicate with you by: Responding to your requests. If you contact us with a problem or question, we will use your information to respond.
- Sending emails and CTC messages. We may send you Service and administrative emails and messages. We may also contact you to inform you about changes in our Services, our Service offerings, and important Service related notices, such as security and fraud notices. These emails and messages are considered part of the Services and you may not opt-out of them. In addition, we sometimes send emails about new courses or other news about CTC. You can opt out of these at any time.
- Billing and account management. We use account data to administer accounts and keep track of billing and payments.
- Communicating with you and marketing. We often need to contact you for invoicing, account management and similar reasons. We may also use your contact information for our own marketing or advertising purposes. You can opt out of these at any time.
- Investigating and preventing bad stuff from happening. We work hard to keep the Services secure and to prevent abuse and fraud.

This policy is not intended to place any limits on what we do with data that is aggregated and/or deidentified so it is no longer associated with an identifiable user or Customer of the Services.

Your choices

1. Customer Data

Customer provides us with instructions on what to do with Customer Data. A Customer has many choices and control over Customer Data. For example, Customer may provision or deprovision access to the Services, enable or disable third party integrations, manage permissions, retention and export settings, transfer or assign teams, share channels, or consolidate teams or channels with other teams or channels. Since these choices and instructions may result in the access, use, disclosure, modification or deletion of certain or all Customer Data.

2. Other information

If you have any questions about your information, our use of this information, or your rights when it comes to any of the foregoing, contact us at info@ctc.ac.uk.

Other Choices

In addition, the browser you use may provide you with the ability to control cookies or other types of local data storage. Your mobile device may provide you with choices around how and whether location or other data is collected and shared. CTC does not control these choices, or default settings, which are offered by makers of your browser or mobile device operating system.

Sharing and Disclosure

There are times when information described in this privacy policy may be shared by CTC. This section discusses only how CTC may share such information. Customers determine their own policies for the sharing and disclosure of Customer Data. CTC does not control how Customers or their third parties choose to share or disclose Customer Data.

1. Customer Data

CTC may share Customer Data in accordance with our agreement with the Customer and the

Customer's instructions, including:

• With third party service providers and agents. We may engage third party companies or individuals to process Customer Data.

• With affiliates. We may engage affiliates to process Customer Data for example examination boards and universities.

2. Other information

CTC may share other information as follows:

• About you. There may be times when you contact CTC to help resolve an issue specific to you. In order to help resolve the issue, we may share your concern with others.

• With third party service providers and agents. We may engage third party companies or individuals, such as third party payment processors, or agents to process information on our behalf.

• With affiliates. We may engage CTC agents to process information for us.

3. Other types of disclosure

CTC may share or disclose Customer Data and other information as follows:

• During changes to our business structure. If we engage in a merger, acquisition, bankruptcy, dissolution, reorganisation, sale of some or all of CTC's assets, financing, acquisition of all or a

portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence).

• To comply with laws. To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.

• To enforce our rights, prevent fraud and for safety. To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.

We may disclose or use aggregate or de-identified information for any purpose. For example, we may share aggregated or de-identified information with other educational institutions or others for business or research purposes.

Security

CTC takes security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorised access or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology.

To learn more about current practices and policies regarding security and confidentiality of Customer Data and other information, please see our Security Practices; we keep that document updated as these practices evolve over time.

Student's information

Our Services are not directed to children under 13. If you learn that a child under 13 has provided us with personal information without consent, please contact us.

Changes to this Privacy Policy

We may change this policy from time to time, and if we do we will post any changes on this page. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

Contacting CTC

Please also feel free to contact us if you have any questions about CTC's Privacy Policy or practices. You may contact us at info@ctc.ac.uk or at our address below:

CTC

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Croydon,

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