



Purple Aurora SEND Short Breaks

Privacy Policy

June 2024

Next Review: June 2025

Privacy Policy

Introduction

Greetings and welcome to the privacy notice of **Purple Aurora Short Breaks Limited**.

Purple Aurora Short Breaks Limited value your privacy and are dedicated to safeguarding your personal information, whether you are a user of our website, a parent or child user, a tutor, or a business contact. This privacy notice provides information on how we handle your personal data when you visit our website or interact with us, regardless of your location. It also explains your privacy rights and the legal protections in place to safeguard your information.

Refer to the Glossary provided at the conclusion of this policy document to comprehend the definitions of certain terminology utilised in this privacy notice.

1. Crucial details and our identity

The objective of this privacy notice is to clarify the purpose.

Our privacy notice provides information on how **Purple Aurora Short Breaks Limited** collects and uses your personal data when you use our website or engage with our services for the purpose of seeking jobs, hiring specialists, or conducting business with us.

We solely gather personal information about children when their parent or legal guardian has enrolled them with us to get tutoring services or short breaks. The parent or legal guardian is the party with whom we have a contractual agreement.

It is crucial that you carefully review this privacy notice in conjunction with any additional privacy notice, policy, or fair processing policy that we may offer on

specific occasions when we collect or process your personal data. This will ensure that you have a complete understanding of how and why we utilise your data. This privacy notice serves as an addition to other existing or future notices and privacy policies, and it does not aim to replace them, unless explicitly mentioned otherwise.

Principles of data protection

Our companies will adhere to data protection regulations and standards, ensuring that your data is:

Utilised in a manner that is legal, just, and easily understood.

We collect data solely for legitimate objectives that we have explicitly communicated to you, and we do not use it in any manner that is inconsistent with those aims.

Pertinent to the specific objectives we have previously communicated to you and restricted solely to those objectives.

Precise and often updated.

Retained just for the duration required for the specific purposes that we have informed you about.

Safely stored.

Regulator

Purple Aurora Short Breaks Limited are the entities that controls and are accountable for your personal information. In this privacy notice, we will refer to **Purple Aurora Short Breaks Limited** as "we", "us", or "our".

We have designated a data protection officer (DPO) who is responsible for supervising inquiries related to this privacy notice. If you have any inquiries regarding

this privacy notice, including any requests to exercise your legal rights as stated below, please contact the Data Protection Officer (DPO) using the provided contact information below.

Contact information

If you have any inquiries regarding this privacy notice or our privacy procedures, kindly reach out to our Data Protection Officer (DPO) using the provided contact information:

The complete legal name of the entities are **Purple Aurora Short Breaks Limited**.

Name of Data Protection Officer/Data Protection Manager: **Ana Caldeira**

Email: **office@purpleaurora.uk**

You are entitled to lodge a complaint with the Information Commissioner's Office (ICO), which serves as the UK regulatory body for matters related to data protection. The ICO's website can be found at www.ico.org.uk. Nevertheless, we would appreciate the opportunity to address your concerns prior to your engagement with the ICO. Therefore, we kindly request that you contact us initially.

Modifications to the privacy notice and your need to notify us of any changes

We regularly check our privacy notice. To access previous versions, please contact us.

Ensuring the accuracy and currency of the personal data we possess about you is of utmost importance. Kindly notify us promptly of any changes to your personal information throughout your association with us.

External hyperlinks from sources other than the primary website.

This website may contain hyperlinks to external websites, plug-ins, and programmes. By clicking on those links or activating those connections, you may give permission for third parties to gather or distribute information about you. We lack authority over these third-party websites and bear no liability for their privacy statements. Upon departing from our website, we strongly advise you to peruse the privacy notice of each subsequent website you visit.

2. The information we gather on you

Personal data, often known as personal information, refers to any information that can be used to identify an individual. It excludes data that has undergone identity removal, often known as anonymous data.

We will gather, utilise, retain, and transmit several types of personal information about you, which we have categorised as follows:

Identity Data encompasses personal information such as first name, maiden name, last name, username or a comparable identifier, marital status, title, date of birth, and gender.

Contact Data include the billing address, delivery address, email address, and telephone numbers.

Financial Data encompasses bank account and payment card information that is pertinent to individuals who interact with us.

Transaction Data include information regarding payments made to and received from you, as well as other pertinent details pertaining to the items and services you have acquired from us. This information is relevant to every individual who interacts with us.

The Technical Data collected comprises your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology present on the devices you use to access this website.

Profile Data encompasses several elements such as your photograph (if provided), username and password, records of purchases, orders, or job applications made by you, your interests, preferences, comments, survey replies, and any personal data or social media tags that you share with us through social media or other means.

Usage Data encompasses details regarding your utilisation of our website, products, and services.

Marketing and Communications Data encompasses your choices on receiving marketing materials from us and our third-party partners, as well as your preferences for communication.

The Employee and Clients Recruitment Data pertains specifically to individuals who are using our services and for those who are employed by us. It encompasses data related to your registration on our systems and may comprise the following categories of personal information about you:

The information you have given us during your registration, as well as any documents you have attached or sent to us, such as your curriculum vitae, covering letters, or job application forms, includes your name, title, address, telephone number, personal email address, date of birth, gender, employment history, current roles, skills, languages spoken, qualifications, approvals and certifications from regulatory bodies, as well as your salary, role, opportunity expectations, and current remuneration details.

We request information from ex-employers or other non-relatives, such as references, confirmation of career history data, and any available biography or image data on their websites.

We will process data regarding your race or ethnicity, right to work in the UK, religious views, sexual orientation, and political opinions, only where it is appropriate to do so.

We require access to your health information, including any medical conditions, health records, and sickness records, in cases when it is necessary for us to handle such data.

We will process data regarding criminal convictions and crimes when it is deemed appropriate.

The information, including any assessments of your qualifications and fitness for a position, that is shared with us by the parents you are applying to or with whom we/you are in contact regarding a current or possible role.

Information obtained from your connections who recommended us to you, as well as any opinions expressed by such individuals.

Relevant information about you that is provided by authorities, such as local government or tax agencies, is made accessible to us for processing.

The Child Data consists of the following information: name, age, gender, key stage, and any special educational needs (SEND) they may have.

We also gather, utilise, and distribute consolidated data of our users, such as statistics or demographic data, for any intended objective. Aggregated data, which can be obtained from your personal data, is not legally deemed personal data because it does not disclose your identity either directly or indirectly. As an illustration, we might combine your Usage Data to determine the proportion of people who are accessing a certain feature on a website. Nevertheless, in the event that we merge or link together collected data with your individual data in a manner that

allows for your direct or indirect identification, we consider the merged data to be personal data and will handle it in line with this privacy notice.

Except Tutors, support staff, employees, clinical specialists, and Teachers' Recruitment Data or Child Data, we do not gather any Special Categories of Personal Data regarding you. This includes information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, details about your health, and genetic and biometric data. Except for Tutor, support staff teachers, and clinical specialists Recruitment Data, we do not gather any data regarding criminal convictions and offenses, unless it is deemed suitable.

When we handle Special Categories of Personal Data and criminal history data of tutors for employment purposes, we have implemented a policy document and protections that are legally mandated for processing such data. The primary justification and legal foundation for processing Special Categories of Personal Data of tutors is consent, which is obtained from the client with parental duty. Similarly, consent is obtained from the client with parental responsibility for processing Special Categories of Personal Data of children.

Failure to give personal data

If we are legally required or contractually obligated to collect personal data from you, and you do not provide that data when requested, we may be unable to fulfil the contract we have or are attempting to establish with you (such as providing tutors with efficient recruitment services). If necessary, we may need to terminate a service that you now have with us. However, we will inform you promptly if this action becomes necessary.

3. By what means is your data gathered?

We employ many methodologies to get data from you and about you, which include:

Interactions that occur without any intermediaries or intermediation. You can provide us with your Child Data, Identity, Contact, Financial, Marketing and Communications, Tutor, support staff, Teachers, and Clinical specialists Recruitment Data by registering with us, completing forms, or communicating with us through LinkedIn posts, phone calls, emails, or other means. You may also direct us to your website or social media accounts. This includes the personal information that you furnish when you:

Enrol in and utilise our services;

Please sign up for our publications.

Please provide your contact information so that we can send you marketing materials.

Participate in a contest, promotional event, or survey; or

Please provide us with feedback or get in touch with us.

Automated technologies or interactions. During your interaction with our website, we will automatically gather Technical Data regarding your equipment, browsing activity, and trends. We get this personal data through the utilisation of cookies, server logs, and analogous technologies. For further information, please refer to our cookie policy.

External entities or sources that are accessible to the public. We will obtain personal data pertaining to you from multiple third-party sources [and publicly available sources] as described below:

Purple Aurora Short Breaks Limited data is obtained from our parent clients, with whom you interact, as well as your present and former employers. Additionally, we may also gather information from relevant authorities and regulators in the countries where our operations are conducted.

Analytics providers' technical data

Obtain contact, financial, and transaction data from suppliers of technical, payment, and delivery services, such as Digital Blueprint Limited, which is located in the UK.

Identity and Contact Data are obtained from data brokers or aggregators, such as Digital Blueprint Limited located in the UK.

Identity and Contact Data were obtained from publicly accessible sources, such as Companies House.

4. Our utilisation of your personal data

We will solely utilise your personal data in accordance with legal permissions. Typically, we will utilise your personal data in the following situations:

Where we must execute the contract, we intend to engage in or have already engaged in with you.

When our legitimate interests (or those of a third party) are important and your interests and fundamental rights do not outweigh those interests.

Where we are required to adhere to a legal requirement.

If you, as a parent, have provided permission for the processing of your child's data, including their special category data, to find suitable tutors for your child's special needs education and disability requirements.

Refer to the Glossary section at the end of this privacy notice for a further definition of the term "Lawful Basis". This section will provide you with information about the specific forms of lawful basis that we will use to handle your personal data.

Regarding Child Data, we often do not consider consent as a legal justification for processing your personal information. However, we will obtain your approval before

sending you any third-party direct marketing messages through email or text message. You possess the entitlement to revoke your consent for marketing purposes at any given moment by reaching out to us.

Intended applications of your personal data

Below, we have provided a table outlining the many methods in which we intend to utilise your personal data, along with the specific legal grounds on which we rely to carry out these actions. We have also determined our valid interests, if applicable. It should be emphasised that we rely on the parent's consent to handle their child's Child Data, which is why it is not included in the table below.

Please be aware that we may utilise several legal justifications to process your personal information, depending on the exact purpose for which we are utilising your data. If you require information regarding the exact legal basis we are using to treat your personal data, especially when multiple bases are included in the attached table, please reach out to us.

Our company's promotional offers

We may utilise your Identity, Contact, Technical, Usage, Profile, and employees Recruitment Data to develop an understanding of your preferences, needs, and areas of interest. This is the process by which we determine the suitability of products, services, offers, or job possibilities for you (referred to as marketing).

If you have asked for information or bought goods or services from us and have not chosen to not receive marketing, you will get marketing messages from us.

External marketing conducted by a separate entity

Prior to sharing your personal data with any third party for marketing reasons, we will obtain your explicit authorization.

Choosing not to participate or be involved.

You have the option to request that we or third parties cease sending you marketing messages by contacting us at any given moment.

If you choose not to receive these marketing messages, we will nevertheless retain and handle your personal data in accordance with this privacy notice.

Edible confections

You have the option to configure your browser to reject all or certain browser cookies, or to receive notifications when websites create or access cookies. Should you choose to disable or decline the usage of cookies, it is important to be aware that certain sections of this website may become inaccessible or experience impaired functionality.

Shift in objective

We shall solely utilise your personal data for the specific purposes for which it was initially obtained, unless we reasonably determine that there is a need to use it for an alternative purpose that aligns with the original intention. If you desire an elucidation about the compatibility of the processing for the new purpose with the original purpose, kindly reach out to us.

In the event that we require the utilisation of your personal data for a purpose that is not directly related, we will inform you and provide an explanation of the legal justification that permits us to do so.

Kindly be aware that we may handle your personal information without your awareness or agreement, in accordance with the aforementioned regulations, if it is necessary or allowed by law.

Automated decision making refers to the process of using computer algorithms and artificial intelligence to make decisions without human intervention.

To the best of our knowledge, we do not employ any automated decision-making processes regarding our Tutors or other individuals whose data we handle.

5. Notification regarding the sharing of your personal information

We may disclose your personal information to the parties listed below for the purposes specified in the table above.

Internal Third Parties, as defined in the Glossary.

External Third Parties, as defined in the Glossary. We refrain from selling your data to any other parties. All transfers must be both necessary and permitted for the purposes stated in this privacy notice.

We may opt to sell, transfer, or merge portions of our business or assets with external entities. Alternatively, we may pursue the acquisition or merger of other firms. In the event of a modification occurring within our firm, the subsequent owners may utilise your personal data in a manner consistent with the guidelines outlined in this privacy notice.

It is mandatory for all third parties to uphold the security of your personal data and handle it in compliance with legal regulations. We prohibit our third-party service providers from utilising your personal data for their own objectives. Instead, we only authorise them to handle your personal data for specific purposes and in compliance with our instructions.

6. Global remittances

Several of our external third parties are located outside the United Kingdom (UK) and the European Economic Area (EEA). Consequently, when they handle your personal data, it will be necessary to transmit the data outside the UK and the EEA.

When we move your personal data from the UK and the European Economic Area (EEA), we make sure that it receives a similar level of protection. We do this by implementing at least one of the following safeguards:

We will only transfer your personal data to countries that have been determined to have a sufficient degree of protection for personal data by the UK government and the European Commission. To clarify, the UK and EU have reached mutual agreements about these areas.

In cases where we utilise particular service providers, we may employ specific contracts that have been authorised by the European Commission. These contracts ensure that personal data receives the same level of protection as it does within Europe. These are referred to as standard contractual clauses and we ensure that a suitable risk assessment has been conducted to accompany the implementation of such contractual safeguards.

If you require additional details regarding the exact procedure employed by our organisation for transferring your personal data outside of the United Kingdom and the European Economic Area, please do not hesitate to contact us.

7. Information security

We have implemented effective security protocols to safeguard your personal data against accidental loss, unauthorised access, manipulation, or disclosure. Furthermore, we restrict the availability of your personal data to only those employees, agents, contractors, and other third parties that possess a legitimate business requirement for such information. They will only handle your personal data based on our instructions or their obligatory legal obligations, and they are obligated to maintain confidentiality.

We have implemented protocols to address any suspected breach of personal data and will inform you and any relevant regulatory authority of such a breach if it is legally mandated.

8. Data retention refers to the practice of storing and preserving data for a specific period of time.

What is the duration for which you will retain my personal data?

We will store your personal data for a duration that is reasonably necessary to fulfil the purposes for which it was collected. This includes meeting any legal, regulatory, tax, accounting, or reporting obligations. Typically, this duration is 6 years, as dictated by the limitation periods for legal and tax matters. If there is a complaint or a potential legal dispute related to our contact with you, we may keep your personal data for an extended period of time.

In order to establish the suitable duration for retaining personal data, we consider the quantity, characteristics, and sensitivity of the personal data, the potential risk of unauthorised use or disclosure of your personal data, the objectives for which we handle your personal data, and whether we can achieve those objectives through alternative methods. We also consider the relevant legal, regulatory, tax, accounting, or other obligations.

Upon request, we will provide you with the specific retention periods for different parts of your personal data.

Under certain conditions, you have the option to request the deletion of your data. Please refer to the material provided below for further details.

Under certain conditions, we may anonymize your personal data, rendering it no longer identifiable to you, for the purpose of research or statistical analysis. In such cases, we reserve the right to utilise this information indefinitely without providing any additional notification to you.

9. Legal entitlements

In specific situations, you possess entitlements under data protection legislation regarding your personal information. Refer to the Glossary section on "Your Legal Rights" for further information on these rights:

If you desire to exercise any of the aforementioned rights, kindly get in touch with our Data Protection Officer (DPO).

Typically, no money is necessary.

No cost is required for accessing your personal data or exercising any other rights. Nevertheless, we reserve the right to impose a reasonable price if your request is evidently baseless, recurrent, or unreasonable. Alternatively, we could decline to adhere to your request under these conditions.

The information we want from you

In order to verify your identification and uphold your right to access your personal data or exercise any other rights, we may require you to provide us with specified information. This is a security precaution implemented to prevent the unauthorised disclosure of personal data. In order to expedite our response, we may potentially reach out to you to collect more information pertaining to your inquiry.

Deadline for response

We endeavour to address all valid inquiries within a period of one month. In certain cases, if your request is notably intricate or if you have submitted many requests, it may occasionally need more than a month for us to complete. Under these circumstances, we will inform you and provide you with regular updates.

10. Glossary

Legal justification

Consent refers to the voluntary, explicit, well-informed, and unmistakable expression of the data subject's desires. This can be done through a statement or a clear affirmative action, indicating agreement to the processing of personal data pertaining to themselves or, in the case of our parent clients, their children.

Legitimate Interest refers to our business's interest in efficiently operating and managing our operations to provide you with the highest quality service/product and a secure and optimal experience. Prior to processing your personal data for our legitimate interests, we carefully assess and weigh any potential effects on you, taking into account both positive and negative impacts as well as your rights. We refrain from utilising your personal data for activities that might have a greater impact on you than our own interests, unless we have obtained your consent or are legally obligated or authorised to do so. If you would like more details on how we evaluate our legitimate interests about specific actions and how they may affect you, please feel free to contact us.

Performance of Contract refers to the processing of personal data when it is necessary for the execution of a contract in which you are involved, or to take actions upon your request before entering into such a contract.

Complying with a legal obligation refers to the act of handling your personal data when it is essential to meet a legal requirement that we are obligated to follow.

External entities

Internal third parties refer to individuals or groups within an organisation who are not directly employed by the organisation but are still involved in its operations or decision-making processes.

Occasionally, there may be other companies inside our corporate group. Currently, there are no additional companies of that nature.

External third parties

Our third-party processors, including service providers, advisors, platform technology providers (such as Digital Blueprint Limited), and email provider (currently Digital Blueprint Limited), may have access to minimal identification data, which may be shared on our Xero accounting system. You can find more information about our privacy practices on the Xero website: <https://www.xero.com/uk/legal/privacy/>. Tutors should request appropriate privacy disclosures from hirers, as hirers will then become independent controllers, utilising the data for their own objectives.

Providers of web hosting services.

The individuals who provide consultation, banking, legal, insurance, marketing, accounting, and other professional services, such as lawyers, bankers, auditors, and insurers, are considered professional advisers. They may function as processors or joint or independent controllers.

HM Revenue & Customs, regulators, and other authorities serve as independent controllers and may require reporting of processing actions in specific situations, or equivalent requirements may apply in EEA nations.

LEGAL RIGHTS

You are entitled to:

Submit a formal request to obtain access to your personal data, which is generally referred to as a "data subject access request". This allows you to obtain a duplicate of the personal information we have on record for you and verify that we are handling it in accordance with the law.

Please request the rectification of the personal data that we possess regarding your person. You have the option to rectify any missing or erroneous data we possess regarding your personal information. However, we may require verification of the accuracy of any new data you supply to us.

Please submit a formal request for the deletion of your personal data. You have the option to request the deletion or removal of your personal data if there is no valid reason for us to continue processing it. You are entitled to request the deletion or removal of your personal data if you have exercised your right to object to the processing of your information, if we have processed your information unlawfully, or if we are obligated to erase your personal data in order to comply with local law. Please be aware that there may be instances when we are unable to fulfil your request for erasure due to specific legal grounds. If this is the case, we will inform you of the reasons at the time of your request, if applicable.

Oppose the processing of your personal data if we are relying on a legitimate interest (or the interest of a third party) and if there are specific circumstances that lead you to object to this processing, as you believe it infringes upon your basic rights and freedoms. You also possess the entitlement to dissent if we are engaged in the processing of your personal information for the goal of direct marketing. Under certain circumstances, we may provide evidence that we have strong and valid reasons to handle your information that take precedence over your rights and freedoms.

Please request the limitation of processing your personal data. You can request us to halt the processing of your personal data in the following situations:

If you desire us to verify the precision of the data.

In cases where our utilisation of the data is in violation of the law, however you express a desire for us not to delete it.

We will retain the data in the location specified by you, even if we no longer have a need for it, as it is necessary for the purpose of establishing, exercising, or defending legal rights.

You have expressed your objection to our utilisation of your data, nevertheless, we must ascertain whether we possess compelling and lawful reasons that supersede your objection in order to continue using it.

Please submit a formal request for the transfer of your personal data to either yourself or a designated third party. We shall furnish your personal data to you, or a designated third party, in a manner that is organised, widely adopted, and can be easily read by machines. Please be aware that this entitlement just pertains to computerised data that you initially granted us permission to utilise or in cases where we employed the data to fulfil a contractual agreement with you.

You have the right to revoke your consent at any time if we are using your consent as the basis for processing your personal data. Nevertheless, the legality of any previous data processing will be unaffected even if you decide to revoke your consent. Revoking your consent may result in our inability to offer specific products or services to you. We will inform you whether this is true when you decide to revoke your consent.