

## **Privacy Policy**

**Owner: World of Education Ltd**

**Effective Date:** 02/10/2025

**Review Date:** 02/10/2026

### **1. Introduction**

At World of Education (“we”, “us”, “our”), your privacy is of the utmost importance. This Privacy Policy explains how we collect, use, store, and protect personal data from learners, parents/guardians, and tutors who engage with our educational services worldwide.

World of Education operates a controlled-access, no-local-retention data model. This means:

- All learner data is stored within secure company systems.
- Tutors and staff can only view the limited data necessary for their role.
- Tutors cannot download, email, or store learner data on personal devices.

We comply with the UK GDPR, EU GDPR, COPPA (for U.S. learners), and other applicable international privacy laws.

### **2. Who We Are**

World of Education is an international education provider delivering live and recorded online classes for children and adults. Our classes are conducted via secure online platforms, including Microsoft Teams and Google Workspace, under the management of Onyx Student Support Ltd (UK-based).

### **3. Legal Basis for Processing**

Our lawful bases for processing include:

- **Consent** (including verifiable parental consent for learners under the age of consent)
- **Contractual necessity** (to provide education services and manage accounts)
- **Legal obligation** (for safeguarding and compliance)
- **Legitimate interests** (educational quality assurance and administration)

Where required by local laws, such as the U.S. COPPA, we obtain additional permissions and consents.

## **4. Types of Data We Collect**

We collect only the information necessary for educational, safeguarding, and administrative purposes.

### **A. Learners (Children and Adults)**

- Name and age group
- Address
- Contact details
- Attendance and participation records
- Class assignments or engagement data
- Learning preferences or support needs (optional)
- Technical data (IP address, device, location, browser)

**Note:** Tutors view only first names, age range, learning preferences or support needs, and attendance status during live sessions. They do not have access to learner contact details, addresses, or personal identifiers.

### **B. Parents/Guardians**

- Full name and relationship to learner
- Contact details
- Consent records
- Payment information (if applicable)

### **C. Tutors and Staff**

- Full name, contact information, and qualifications
- Background and identity checks (e.g., DBS or local equivalent)
- Employment or contractual records
- Compliance records (Data Protection and Safeguarding training, signed agreements)

## **5. How We Collect Information**

We collect data through:

- Secure registration and consent forms
- Attendance registers and internal reporting systems
- Live classes and approved educational platforms
- Internal safeguarding and incident reporting forms

- Cookies and analytics on our website (see Cookie Policy)

All data is collected through company-controlled systems. Tutors do not hold or retain learner data outside these environments.

## **6. How We Use Your Information**

We use personal data to:

- Deliver personalised online education
- Record attendance and manage classes
- Ensure safeguarding, security, and quality assurance
- Manage billing and administration
- Provide support and respond to enquiries
- Meet legal and compliance obligations

World of Education does not use learner data for marketing to children or for automated profiling.

Tutors access data only during live sessions and cannot download or email learner information. All records remain securely stored in Microsoft 365 or Google Workspace and are managed by authorised administrators only.

## **7. Safeguarding and Children's Privacy**

We are committed to ensuring the safety and privacy of children online. To achieve this:

- All tutors undergo enhanced DBS or equivalent checks.
- Tutors access only minimal learner data necessary for teaching.
- Learners are identified by first name only in class.
- Safeguarding concerns are reported through secure internal forms.
- Recorded sessions (if any) are stored securely and never shared publicly.
- Parental consent is required for learners under 16 (or 13 in the U.S.).

## **8. Data Sharing and Disclosure**

We do not sell or rent personal data. We may share information only with:

- Authorised tutors and staff, who are bound by signed Data Protection and Confidentiality Agreements.

- Platform providers (Microsoft Teams, Google Workspace) under strict Data Processing Agreements (DPAs).
- Payment processors (Stripe, PayPal) for billing purposes.
- Regulatory or safeguarding authorities, where required by law.

All third parties meet stringent security and data protection standards. Tutors are prohibited from retaining or sharing any learner data outside company systems.

## 9. Cross-Border Data Transfers

Where data is transferred internationally, we ensure compliance through:

- Standard Contractual Clauses (SCCs)
  - UK International Data Transfer Addendums (IDTAs)
  - Data Protection Agreements with approved vendors
- All core systems are hosted within the UK/EU.

## 10. Cookies and Tracking

Our website uses cookies to enhance performance and improve user experience. Users can accept or decline non-essential cookies. Further details are provided in our Cookies Policy.

## 11. Data Security

World of Education applies robust security controls, including:

- Controlled access and user permissions
- Encryption of all stored and transmitted data
- Multi-factor authentication (MFA)
- Regular security audits and risk assessments
- Ongoing data protection and safeguarding training for staff and tutors

We monitor tutor access and enforce strict no-local-storage and no-email-transfer rules. All data is processed within secure, company-managed environments.

## 12. Data Retention

| Data Type                      | Retention Period             |
|--------------------------------|------------------------------|
| Learner records                | 2 years after education ends |
| Financial and transaction data | 6 years                      |
| Safeguarding records           | As required by law           |

|                       |                                           |
|-----------------------|-------------------------------------------|
| Tutor records         | Duration of engagement + statutory period |
| Cookies and analytics | As per Cookies Policy and user consent    |

After retention, data is securely deleted or anonymised.

### 13. Your Data Rights

All users have the right to:

- Access their data
- Request correction or deletion
- Withdraw consent at any time
- Restrict or object to processing
- Request data portability
- File a complaint with the Information Commissioner's Office (ICO) or relevant supervisory authority.

To exercise any rights, please email [info@worldofeducation.online](mailto:info@worldofeducation.online).

### 14. Contact Information

**Data Protection Officer:**

Jane Pickering

[info@worldofeducation.online](mailto:info@worldofeducation.online)

**Director:**

Angela Sargeant

[info@worldofeducation.online](mailto:info@worldofeducation.online)

**Approved by:** Jane Pickering, Data Protection Officer

**Policy Owner:** Angela Sargeant, Director