



Adams Educational Services Limited

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Our Privacy Policy

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1. Introduction

This Policy sets out the way in which Adams Educational Services Limited will deal with and manage your personal data. It tells you how we collect and process your personal data.

Adams Educational Services Limited is committed to protecting the privacy of our students, customers, clients and users of our website.

We respect your privacy and your rights to control your personal data (data). We will always protect your data, be clear about the data we collect from you and the reasons why. We do not and will not sell your data to third parties.

We will only use your data when the law allows us to. Most commonly, we will use your data in the following circumstances:

- Where it is necessary for our legitimate business interests (or those of a third party) and your interests and fundamental rights do not override those interests
- As an accredited organisation we are audited annually by awarding bodies such as Ofsted, DSA QAG, Aid Training & Operations Ltd and Nuco Training
- Where we need to perform the contract for services we are about to enter into or have entered into with you
- Where we need to comply with a legal or regulatory obligation.

This Privacy Policy (the 'Policy') explains the data we collect from you, either directly or indirectly, why and how we use it. It explains how we protect your data, the choices you can make about the data we collect and how you can control these decisions.

Please read the following carefully to understand your rights under the new General Data Protection regulation (GDPR) and our views and practices regarding your personal data and how we will treat it.

If you have any comments on this privacy policy, please email them to

GDPR@adamseducationalservices.co.uk

2. Who We Are

Adams Educational Services Limited is:

- A Disability services & support organisation
- an accredited Non-Medical Helper (NMH) Provider
- a Health and Safety, Safeguarding and First Aid Training Centre

More information about us:

- Our company name is Adams Educational Services Limited under Companies House registration number 09849313 and VAT Registration Number: 286 5049 73
- Our registered address is Victory Way, Admirals Park, Crossways, Dartford, Kent, United Kingdom, DA2 6QD
- Our Information Commissioner's Office Registration number is ZA150485
- Our representative for the purpose of data protection compliance is Mostapha Alfaour who can be contacted at GDPR@adamseducationalservices.co.uk
- Our website address is <https://www.adamseducationalservices.co.uk>

We are a Controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679).

When you use Adams Educational Services Limited, you trust us with your information as a 'data controller' and we are committed to preserving that trust and respecting your privacy.

We will ensure that the information you submit to us via our website or through any other means is only used for the purposes set out in this privacy policy.

3. Personal Information We Collect

For the purposes of this policy, “Personal Information” means information about an identifiable individual or information that permits an individual to be identified and which is collected by Adams Educational Services Limited through the use of our services, including our website and any other online platforms that may be offered or operated from time to time. Personal Information does not include business contact information, such as name, title, business address and business telephone number when used for business communications.

Depending on the nature of your interactions or relationship with Adams Educational Services Limited, we may collect such Personal Information as your first and last name, postal and email addresses, telephone number(s), social network data, information concerning your social circumstances, including age, date of birth, employment details and job title, education/qualification information, gender, and other sensitive Personal Information. We may also collect certain technical information about your use of our website and online platforms, including your IP address, the type of browser you use, access times, pages viewed and the referring link through which you accessed our website or platform. If you choose to engage in the purchase of any service from us, we or our third-party payment processors will collect your payment information.

Technologies such as cookies, beacons, tags and scripts, which are identifying technologies that your computer receives when you visit certain websites are used by Adams Educational Services Limited. In certain circumstances, we may match or correlate this information with personal information that you may have previously submitted. Most browsers can be set to reject all cookies but features of our website may not work as intended if that option is chosen. We use permanent cookies to analyse website usage. We use temporary (session based) cookies to improve performance and to determine web trends. Temporary cookies disappear when you close your browser window. We use your IP address to help diagnose problems with our server, and to administer our website. Your IP address is used to help identify you for the purposes of gathering broad demographic information. We also use Google Analytics, Google Tag Manager, Google AdWords (Conversion Tracking), LinkedIn (Conversion Tracking), Optimize. Some or all of these tools may be used to track information about your behavior on our website depending on your region.

4. Our commitment

Adams Educational Services Limited takes responsibility for maintaining and protecting Personal Information under our control. The Managing Director is currently the Data Protection Officer who can be contacted directly by the public and who is responsible for our day to day compliance. We review this policy and our personal data protection practices regularly to ensure that we are in compliance with applicable legislation and current best practices. We do not knowingly collect any personal information from children under the age of 18 without parental consent and the services offered by Adams Educational Services Limited are not intended for use by children without parental consent.

5. What are the purposes for which we collect and process personal data?

We collect, and process personal data as follows:

a teacher, support worker, service provider (or other member of staff):

- Personal data: Full Name, email, telephone, date of birth, photo and address
- Employment disclosure information: Proof of identity, references and DBS / Disclosure Scotland
- CV / Application form
- Finance details: National Insurance Number, Unique Tax Reference and bank details
- A record of the correspondence between us
- A record of the transactions between us
- Copies of appropriate contracts in place between us
- Certificated copies of qualifications including training and professional body membership (s) and accreditations
- Invoices and timesheets sent to us by you

Parent / Carer:

- Name of your child and yourself
- Application form completed
- Email and telephone numbers
- Home, school, college, university or work Addresses
- A record of the correspondence between us
- Timesheets and registers signed
- Individual Learning Plans of your child
- Full diagnostic reports / Educational Psychologist report if appropriate
- DSA Entitlement Letter if appropriate
- Needs Assessment Report if appropriate
- Details about your course, school, college or university attended
- Other relevant documents and communications that are required to support you more effectively
- Records of all assessments that have been carried out
- Invoices sent to you by us

Children's Privacy

Protecting the privacy of young children is especially important. For that reason, except as expressly set out in this Privacy Policy and with your consent, Adams Educational Services Limited does not knowingly collect or solicit Personal Information from anyone under the age of 18 without parental consent and the services offered by us are not intended for use by children without parental consent. . In the event that we learn that we have collected Personal Information from a child under age 13 without parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at Info@adamseducationalservices.co.uk.

Student / learner / delegate:

- Full Name
- Email and telephone numbers
- Home, school, college, university or work Addresses
- Application Form completed
- A record of the correspondence between us
- Timesheets and registers signed
- Individual Learning Plans
- Full diagnostic reports / Educational Psychologist report if appropriate
- DSA Entitlement Letter if appropriate
- Needs Assessment Report if appropriate
- Details about your course, school, college or university attended
- Other relevant documents and communications that are required to support you more effectively
- Records of all assessments that have been carried out
- Invoices regarding support services provided to you

Website Users/Prospective Customers

- Information you submit through forms or surveys on our site at any time
- Personal information you have agreed to pass to us through third parties
- A record of any correspondence between us
- Details of your enquiry
- Details of your visits to our site and the resources you use
- Information about your computer (e.g. your IP address, browser, operating system, etc.) for system administration.

Existing Customers

- Name
- Email and telephone numbers
- Address
- Bank details
- Proof of Identity and Address
- A record of the correspondence between us
- A record of the transactions between us
- Copies of appropriate contracts in place between us
- Invoices sent to you by us

Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

- a. You have given consent to the processing of your personal data for one or more specific purposes;
- b. Processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- c. Processing is necessary for compliance with a legal obligation to which we are subject;
- d. Processing is necessary to protect the vital interests of you or of another natural person;
- e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- f. Processing is necessary for the purposes of the legitimate interests pursued by us or for auditing purposes, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data

6. Cookies

All Cookies used by and on our website are used in accordance with current English and EU Cookie Law.

The site uses cookies or similar technology to collect information about your access to the site. Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you.

A few of the cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the site and will last for longer.

All cookies used on our site are set by us.

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can prevent the setting of cookies by adjusting the settings on your browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the site.

Our cookies will be used for:

Essential session management:

- Creating a specific log-in session for a user of the site in order that the site remembers that a user is logged in and that their page requests are delivered in an effective, secure and consistent manner;
- Recognising when a user of the site has visited before allowing us to identify the number of unique users we receive to the site and make sure we have enough capacity for the number of users that we get;
- Recognising if a visitor to the site is registered with us in any way;
- We may also log information from your computer including the existence of cookies, your IP address and information about your browser program in order to allow us to diagnose problems, administer and track your usage of our site.

Functionality:

- Customising elements of the promotional layout and/or content of the pages of the site.

Performance and measurement:

- Collecting statistical information about how our users use the site so that we can improve the site and learn which parts are most popular to users.

Please refer to our Cookie policy for further details.

7. How we use what we collect

We use information about you to:

- Present website content effectively to you.
- Provide information, products and services that you request, or (with your consent) which we think may interest you.
- Carry out our contracts with you.
- Comply with specific legal obligations
- Allow you to use our interactive services if you want to.
- Tell you our charges.
- Tell you about other Adams Educational Services Limited goods and services that might interest you.

If you are already our customer, we will only contact you electronically about things similar to the services we already provide to you.

When being asked for personal information such as your name, address, telephone number and e-mail address, please be assured that Adams Educational Services Limited is complying with all laws and regulations that apply to personal information and is following this outlined Privacy Policy. Adams Educational Services Limited shall use personal information such as names, addresses, e-mail addresses and telephone numbers solely for the purpose specified.

8. How we look after your information / Protection of Personal Data

Adams Educational Services Limited has implemented security measures to prevent unauthorised access, loss, leakage, alteration or extraction of personal information from our systems.

Adams Educational Services Limited will not provide or disclose personal information to third parties without notifying you prior to such provision or disclosure, or unless such third-party is an approved subcontractor. In addition, Adams Educational Services Limited ensures that appropriate management of personal information is being implemented at those entities that have been provided with such information.

We look for opportunities to minimise the amount of personal information we hold about you. Where appropriate we anonymise and pseudonymise your information. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

- ensuring the physical security of our offices, warehouses or other sites;
- ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
- maintaining a data protection policy for, and delivering data protection training to, our employees;
- limiting access to your personal information to those in our company who need to use it in the course of their work and ensure it is kept behind a user password verification system.

You are responsible for ensuring that personal data is transferred to us securely. We will take all reasonable precautions to ensure that all the personal data that is submitted to us for the purposes above remains secure and have procedures to protect the storage and disclosure of personal data. You must ensure passwords are not shared and are kept securely.

9. HOW LONG WE KEEP IT FOR

We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our legitimate interests, such as for the purposes of exercising our legal rights or where we are permitted to do so for purposes of academic and auditing purposes. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example:

- we archive our email and paper correspondence regularly and destroy unnecessary information;
- We operate a best practice email retention policy requiring password protected folders and departmental shared drives to provide restricted access to information;
- We conduct regular access reviews to keep access profiles and policies up to date;
- We conduct periodic review and purge cycles of documents in accordance with our document retention policy;
- we retain information relating to orders, refunds and customer queries for approximately 7 years;
- we retain information relating to Full Diagnostic Assessments for approximately 6 years after the student has reached the age of 18
- we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes we must store this information permanently;
- we destroy CVs and related information from job applicants who have not been shortlisted for interview once the recruitment process is complete. The shortlisted candidates' CVs and related information is kept until after the successful candidate's probation period, which can be 6 months from their start date.

10. Where we store your data

Our company is located in the UK.

Whenever we transfer your personal information out of the European Economic Area (EEA) we will take all steps necessary to ensure that it is adequately protected and processed in accordance with this Privacy Notice by using all appropriate cross-border transfer safeguards such as:

- by entering into the European Commission's Standard Contractual Clauses with the provider which give personal data the same protection it has in the EEA; and
- where the provider is in the US, the EU-US Privacy Shield if the provider is part of the EU-US Privacy Shield Framework.

Please contact us if you would like additional information on the specific means used by us when transferring your personal data outside of the EEA.

By giving us your personal data, you agree to this arrangement. We will do what we reasonably can to keep your data secure.

We only keep your personal data for as long as we need to in order to use it as described above in section 5, and/or for as long as we have your permission to keep it. In any event, we will conduct an annual review to ascertain whether we need to keep your personal data. Your personal data will be deleted if we no longer need it.

11. Your rights

Under the GDPR, you have the right to:

- Request access to, deletion of or correction of, your personal data held by us at no cost to you;
- Request that your personal data be transferred to another person (data portability);
- Be informed of what data processing is taking place;
- Restrict processing;
- To object to processing of your personal data; and
- Complain to a supervisory authority

Adams Educational Services Limited and its affiliated companies may utilise personal information to provide you with information regarding products and services and in business operations for developing products and services. If you would not like to receive such information or if you do not want your personal information to be utilised in our business operations, please write to us stating that such is the case. Upon receipt of the request, we will stop the use of your personal information for such purposes. However, you acknowledge this will limit our ability to provide the best possible products and services to you.

Moreover, if you would like to confirm, correct or delete personal information provided by you on this website, please write to us stating that such is the case. We will then take appropriate measures to respond to your request.

In some cases, the collection of personal data may be a statutory or contractual requirement, and we will be limited in the products and services we can provide you if you don't provide your personal data in these cases.

12. Your Right to Complain

Please contact us if you have any questions or are unhappy about the way your information is used. We hope we will be able to resolve any problems or issues you may.

You also have the right to lodge a complaint about us and our use of your information to the UK Information Commissioner's Office (<https://ico.org.uk/>) or the relevant authority in your country of work or residence.

13. Links to other sites

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our site. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

14. Acceptance of this Policy

We assume that visitors to Adams Educational Services Limited website and users of all our services and online platforms have carefully read and understood this policy and agree to its contents. If you do not agree with this Privacy Policy, you should refrain from using our website and any services and online platforms offered by us. Your continued use of Adams Educational Services Limited's website and any services and online platforms offered by Adams Educational Services Limited implies your acceptance of this Privacy Policy and any revisions hereto. This Privacy Policy is an integral part of terms and conditions associated with any of the services and online platforms offered by Adams Educational Services Limited from time to time.

15. How to contact us

If you wish to request access to personal information about you, request a correction to information about you or have questions about our privacy policy, you may contact our Data Protection Officer as follows:

Data Protection Officer Adams Educational Services Ltd Victory Way, Admirals Park, Crossways, Dartford, Kent, United Kingdom, DA2 6QD	Tel: 020 3291 3931 M: 07482605308 Email: GDPR@adamseducationalservices.co.uk
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Adams Educational Services Limited reviews this Privacy Policy on a regular basis and will post the revised or updated policy from time to time as required. This Privacy Policy was last updated on July 2020.