

Axiom Maths Privacy Notice

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Why are you receiving this Privacy Notice?

We, The Tutor Trust, take the protection of all personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR-EU and GDPR-UK). You can contact us:

By Post: The Tutor Trust, 3rd Floor, Virginia House, 5-7 Great Ancoats Street, Manchester, M4 5AD

By Phone: 0161 833 3055

By Email: privacy@thetutortrust.org

To deliver the Maths Circles intervention on behalf of Axiom Maths, The Tutor
Trust will need to collect data on those students nominated to receive tuition, in
addition to some data from specific school/college staff and parents. This privacy
notice gives you information on how we collect and process the data before,
during and after the programme is delivered. Axiom Maths will use some of the
data collected by The Tutor Trust for their own reporting and impact evaluation
– further information about their use of personal data is available here.

We have appointed a data protection officer (DPO) who is responsible for monitoring and providing guidance with our data protection obligations. If you have any questions about this privacy notice, please contact the DPO/us using the contact information in section 11 of this privacy notice.



What will this intervention involve?

We deliver tuition to Maths Circles on behalf of Axiom Maths. Maths Circles are small groups of pupils meeting weekly to work through a structured curriculum of challenging problems, beyond what they would ordinarily be exposed to in the National Curriculum.

Tuition runs for 30 weeks each academic year and is fully funded by Axiom Maths. Pupils join the project in Year 7 and continue through until Year 11.

Lawful basis of processing information

We only collect and use personal information when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract.
- If the processing is necessary for compliance with a legal obligation to which the controller is subject.
- If the processing is necessary for the purpose of the legitimate interest pursed by us. For this intervention our legitimate interest is to facilitate the successful running of the programme.

For the processing of special category data, we will process it under one of the below conditions:

- Explicit consent
- Employment, social security and social protection (if authorised by law)



 Reasons of substantial public interest. This can be for equality of opportunity or treatment, support for individuals with a particular disability or medical condition, insurance or statutory and government purposes.

What personal data is being collected and why?

The Tutor Trust will collect the following data from those schools which partner with us for this intervention:

Students

Student name (first, middle and surname, plus preferred name)

Student number

Pronouns

School Year

Date of Birth

Unique Pupil Number

Gender

Eligibility status for Pupil Premium

KS2 Maths Attainment Score

Any other Maths Attainment Score/Type

Special educational needs and disability (SEND) status

Home Address

Contact (parent/carer) name

Contact relationship



Contact phone number

Contact email

Schools/colleges

School Name

School Postal Code

Name of School Partnership Lead/Senior Leader and Designated Safeguarding Lead

Contact details (email address and phone number) of School Partnership Lead/Senior Leader and Designated Safeguarding Lead

School Unique Reference Number

Why do we process this personal data?

We ask for data about the learners who will receive tuition in order to deliver the tuition programme effectively, and to monitor the impact of tuition.

Who will the data be shared with?

To facilitate this programme, the above-mentioned data will be shared between The Tutor Trust and your school/college. The Tutor Trust will transfer no personal data outside of the EEA for the delivery of this intervention.

Student data will be shared with Axiom Maths. All data will be shared securely, via an online portal (the Axiom Hub), in line with data protection policies and

procedures. Axiom Maths will use the data for various purposes, as listed in their Privacy Notice <u>here</u>.

For existing students on the programme (those who joined prior to the 2024/25 academic year), we require explicit parental consent for their continued participation, and for their data to be uploaded to the Axiom Hub. Please follow the opt-in process as outlined in the parental letter you will have received.

Axiom Maths transfers personal data to countries outside of the EEA, but only where appropriate safeguards are in place (such as the International Data Transfer Agreement or the International Data Transfer Addendum) or an adequacy decision is in place, in line with data protection legislation. For more detail on the transfer of data, visit our data protection policy here: Axiom Maths Data Protection Policy.

How long will the data be held?

We pride ourselves on ensuring that the personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. All personal information collected has a defined retention period, which is in-line with our retention policy. In this case, data will be retained for 1 academic year post the student's last interaction with the Axiom Maths programme. Please see the "additional information" section of this policy to contact us for further information.

Security of data

We take the responsibility for protecting your privacy very seriously and we will ensure the personal data provided is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to the data to those employees who only have a business need to know.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see the "additional information" section of this policy to contact us for more information

Failure to provide requested information

Where we need to collect personal data in order to process your instructions or deliver the tuition we have agreed with you and you fail to provide that data when requested, we may not be able to carry out tuition or evaluate the impact. In this case, we may have to cancel our engagement, but we will notify you if this is the case at the time.

Your rights

In this Section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- · Right to Object
- · Right of Access
- · Right to be informed
- · Right to Rectification
- Right to Erasure
- · Right to Restrict Processing
- · Right to Data Portability

The right to object

You can exercise this right if

- o Processing relies on legitimate interest
- o Processing is for scientific or historical research
- Processing includes automated decision making and profiling
- Processing is for direct marketing purposes

The right of access

- You or any third party acting on your behalf with your authority may
 request a copy of the personal data we hold about you without charge.
- We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.



The right to be informed

 We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right.

The right of rectification

 If you believe the personal data we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made.

The right to erasure

o If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it.

The right to restrict processing

- You may ask us to restrict the processing of your personal data. This
 means we will still hold it but not process it. This is a conditional right
 which may only be exercised when:
 - o Processing is unlawful
 - o We no longer need the personal data, but it is required for a legal process
 - o You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
 - o If you are exercising your right to rectification

The right to data portability

- You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
 - Processing is based on consent
 - Processing is by automated means (i.e. not paper based)
- Processing is necessary for the fulfilment of a contractual obligation
 If you have any question about these rights, please see "additional information",
 section 10 of this policy.

You also have the right to withdraw your consent where, consent has been provided. If you wish to withdraw your consent, please email the below email address. Please note this does not affect the lawfulness of any data processing prior to the withdrawal.

Please note we do not carry out any automated decision making or profiling.

Right to complain

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of your school/college or student data is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email at privacy@thetutortrust.org
Alternatively, you can contact us by contacting the Chief Operating Officer who is the GDPR Lead within the organization.

TUTOR TRUST

By Post: The Tutor Trust, 2nd Floor, Studio 10, Little Lever Street, Manchester, M1

1HR

By Phone: 0161 833 3055

If you remain dissatisfied, alternatively, you can make a complaint to the

Information Commissioner's Office:

By Post: Information Commissioners Office, Wycliffe House, Water Lane,

Wilmslow, Cheshire, SK9 5AF

By Website: Click Here

By Email: Click Here

By Phone: 0303 123 1113 (Local rate) or 01625 545 745 (National rate)

Additional information

Your trust is important to us. That is why we are always available to talk with you

at any time and answer any questions concerning how the data is processed. If

you have any questions that could not be answered by this privacy notice or if you

wish to receive more in-depth information about any topic within it, please contact

our DPO on privacy@thetutortrust.org. Our outsourced Data Protection Officer,

Bulletproof, can also be contacted on dpo@bulletproof.co.uk.

Notice review

This privacy notice was published on 24/09/2024.

We will keep this privacy notice under regular review.

Version 1.0 reviewed by Lewis Howell September 2025

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We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of information.