



STUDENT PRIVACY POLICY

About Us

This is the Student Privacy Policy for Fruition Harrogate.

Fruition Harrogate is a professional tutoring centre delivering bespoke educational tutoring programmes to individuals (**Students**). Fruition Harrogate is an independent business operator and is the entity with whom you have (or will have) a contractual relationship with in respect of the Tutoring Services.

We are delighted you have decided to enrol on one of our tutoring programmes (**Tutoring Programme**) or to attend a free taster session of a Tutoring Programme. This Privacy Policy is designed to give you, as a Student (or prospective Student) on one of our Tutoring Programmes (or a Student's parent or guardian acting on a Student's behalf), information about how we obtain and process personal data in connection with the services we provide to you.

References in this Privacy Policy to the "**we**", "**us**" and "**our**" are to Fruition Harrogate.

We are responsible for deciding how we hold and use the personal information we collect or receive about you. We are committed to protecting and respecting your privacy and ensuring that personal and sensitive information is gathered in compliance with this Privacy Policy.

When you attend a free taster session or otherwise enrol on a Tutoring Programme, we shall collect, use, store and transfer different kinds of personal data about you. The personal data we may collect includes information you include on your enrolment form, information you may send to us by email, information disclosed during the course of delivering the Tutoring Programme to you and information about you recorded by our tutors, including test results, reports and course feedback.

Please read this Privacy Policy carefully. From time to time we may also issue other privacy or fair processing notices to you relating to the way in which we collect personal data about you which we will bring to your attention.

If you are a parent or guardian of a child who you wish to enrol as a Student, please make them aware that you will be sharing their personal data with us, the nature of that personal data and the reasons for sharing that data with us as outlined in this Privacy Policy. If your child has any questions which you are unable to answer from the information contained in this Privacy Policy, please raise such questions with Fruition Harrogate, or contact us on the details set out below.

How to contact us

This Privacy Policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

Fruition Harrogate is the controller of your personal data.

If you have any concerns or complaints about the services provided by, or communications you have received from, Fruition Harrogate, please contact us in the first instance.

Our privacy promise

We promise:

1. To keep your data safe and private.
2. Not to sell your data.

The data we collect about you

Personal data, or personal information, means any information relating to an identifiable individual. It does not include any data or information which relates to a person that cannot be identified or where the person's identity has been removed (i.e. anonymous data). It also does not include information relating solely to a business or other organisation, rather than to a person.

We may collect, use, store and transfer different kinds of personal data about you in connection with the provision (or prospective provision) of the Tutoring Programmes to you, which we have grouped together as follows:

Type of personal data	Description
Identity Data	Data which identifies the Student (including the Student's name, title, date of birth, photograph and gender)
Contact Data	Contact details (including the Student's postal address, telephone number and email address)
Tuition Data	Data relating to the Student's Tuition Programme (subject, term dates, attendance records, Fruition Harrogate centre, tutor, fees and related information)
Profile Data	Data we store in connection with the Student's profile on the student portal, student ID number, username and password, preferences, interests, feedback and other communications with us
Parent/Guardian Data	Information relating to the Student's parent or guardian or other next of kin (Identity and Contact data, relationship with the Student and permission to collect Student)
Marketing and Communications Data	Data which we capture when you sign up to newsletters, including your preferences regarding receiving marketing and communications from us
Educational Data	Information about the Student's education history and academic cycle (school, year group, status, abilities and progress)

Type of personal data	Description
Assessment and Attainment Data	Information about the Student's assessment and attainment during the Tuition Programme (including assessment dates, test results, grades, tutor feedback, reports to parents and guardians, content of homework and assessments)
Medical Data	Information relating to the Student concerning any medical conditions, disabilities, allergies, dietary requirements and other similar matters
Ancillary Data	Additional information which is disclosed to us or which we become aware of during the course of the Tuition Programme, including additional matters which may have an impact on the specific tuition the Student requires or the way in which we deliver the Tuition Programme to that Student
Safeguarding Data	Information which is disclosed to us or which we become aware of at any time relating to the safeguarding of the Student or other persons in our care (including persons authorised to collect the Student, password to be used on collection, permission for Student to leave the venue unsupervised and safeguarding concerns)
Financial Data	Information collected when you make a payment to us (bank account and payment card details)
Transactional Data	Details relating to payments of our fees (the agreed services to be provided, your chosen payment method, and correspondence or communications with you in respect of your payments)

We may also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate test results to assess the success rate of a particular Tuition Programme.

However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Aside from the Medical Data listed above, we do not collect **special categories of personal data** about Students or their parents/guardians in connection with the provision of Tuition Programmes. Special category data includes details about a person's race or ethnicity, religious or philosophical beliefs, political opinions, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

How we collect personal data

Direct interactions

The majority of the personal data we hold about Students and their parents/guardians is collected when we correspond or interact directly with Students or their parents/guardians (by post, phone, email,

telephone or otherwise).

This includes personal data you provide when you:

- make an enquiry;
- complete an enrolment form;
- subscribe to receiving marketing communications;
- attend a Tuition Programme or taster session and submit homework/coursework or complete assessments;
- complete a survey;
- make a payment.

The categories of personal data we collect in this way include Identity, Contact, Profile, Tuition, Parent/Guardian, Educational, Assessment and Attainment, Marketing and Communications, Ancillary, Medical, Financial and Safeguarding Data.

Third parties

We may also receive personal data about you from various third parties as set out below:

- Educational Data from your school or other academic institution.
- Safeguarding Data from local authorities, police and other agencies and public bodies where applicable.

How and why we use personal data

We will only collect and process your personal data where we have a legal basis to do so. This legal basis will vary depending on the manner and purpose for which we are collecting your personal information. The circumstances in which we may use your personal data are as follows:

- Where it is necessary for the **performance of a contract** to which you are a party or to take steps at your request before entering into such a contract;
- Where it is necessary to **comply with a legal or regulatory obligation** that we are subject to;
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we have your **consent** to do so, subject to your right to withdraw consent (further details provided in the section headed "Your rights" below).

We have set out in the table below a description of all the ways we plan to use your personal data, and which of the above legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

What we use your personal information for	Type of data	Lawful basis for processing	Basis of legitimate interest (where applicable)
To manage our relationship with you, including notifying you about changes to our terms or Privacy Policy.	• Identity • Contact • Profile • Tuition • Parent/Guardian • Marketing and Communications	• Necessary to comply with a legal obligation • Necessary for our legitimate interests	To conduct our business and to keep our records updated

What we use your personal information for	Type of data	Lawful basis for processing	Basis of legitimate interest (where applicable)
To set you up as a new Student on our systems	• Identity • Contact • Profile • Tuition • Parent/Guardian • Educational • Assessment and Attainment • Ancillary • Safeguarding • Marketing and Communications	• Consent – given at the time of submitting an enrolment form • Necessary for our legitimate interests • Necessary for the performance of a contract with you	To conduct our business and deliver the Tuition Programmes to Students
To contact named individuals in the event of an emergency	• Identity • Parent/Guardian • Medical	• Consent – given at the time of submitting an enrolment form • Necessary for our legitimate interests • Necessary for the performance of a contract with you • In the substantial public interest to safeguard children • To protect the vital interests of the Student	To safeguard Students in our care and operate our business in accordance with appropriate standards
To correspond with you regarding any changes to the Tutoring Programme, such as lesson cancellations, change of tutor, and to keep you updated and informed.	• Identity • Contact • Profile • Tuition • Parent/Guardian • Marketing and Communications • Ancillary	• Necessary for our legitimate interests • Necessary for the performance of a contract with you	To conduct our business and deliver the Tuition Programmes to Students
To put in place appropriate measures to ensure that children with disabilities, medical conditions, allergies, dietary requirements or other special needs are properly cared for and accommodated whilst attending Fruition Harrogate	• Identity • Tuition • Medical • Ancillary • Safeguarding	• Consent – given at the time of submitting an enrolment form • Necessary for our legitimate interests • Necessary for the performance of a contract with you • In the substantial public interest to safeguard children	To safeguard children in our care and operate our business in accordance with appropriate standards

What we use your personal information for	Type of data	Lawful basis for processing	Basis of legitimate interest (where applicable)
To allow individuals named on a submitted enrolment form to collect Students from Fruition Harrogate by using a password	• Identity • Contact • Parent/Guardian • Ancillary • Safeguarding	• Consent – given at the time of submitting an enrolment form • Necessary for our legitimate interests • Necessary for the performance of a contract with you	To ensure the safety of Students and to operate our business in accordance with appropriate standards
To track Student progress and provide feedback to Students' parents/guardians	• Identity • Contact • Profile • Parent/Guardian • Tuition • Educational • Assessment and Attainment	• Necessary for our legitimate interests • Necessary for the performance of a contract with you	To conduct our business and improve our services
To otherwise provide the Tuition Programmes to Students	• Identity • Contact • Tuition • Profile • Educational • Assessment and Attainment • Transactional	• Necessary for our legitimate interests • Necessary for the performance of a contract with you	To conduct our business and deliver the Tuition Programmes
To process and manage fees and charges on Student accounts	• Identity • Contact • Tuition • Financial • Transaction	• Necessary for our legitimate interests • Necessary for the performance of a contract with you	To conduct our business, process payments and recover debts due to us
To deal with and respond to queries submitted to us via our website, by post, email or by telephone	• Identity • Contact • Parent/Guardian • Profile • Marketing and Communications	• Consent – given at the time of contact • Necessary for our legitimate interests	To conduct our business and improve our services
To recommend similar products and services and offer discounts and incentives that may be of interest to you	• Identity • Contact • Profile • Parent/Guardian • Marketing and Communications	• Consent – given at the time of enrolment and/or • Necessary for our legitimate interests	To develop our products/services and grow our business, provided you will always be offered the opportunity to opt-out of such marketing communications
If applicable: CCTV footage (when you enter and exit the building)	• Identity	• Necessary for our legitimate interests	For ensuring the security of our buildings

Marketing

Marketing communications from us: We may send you marketing communications if you:

- are a Student or a parent/guardian of a Student and you have not opted out of receiving marketing communications from us; or
- have otherwise consented to receive marketing communications from us.

Opting out: You can ask us to stop sending you marketing communications at any time, by:

- clicking on the unsubscribe button in the footer of any marketing email from us; or
- contacting Fruition Harrogate directly.

Change of purpose

We will only use your personal data for the purposes for which we originally collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we wish to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you fail to provide personal data

Where we need to collect personal data from you in order to comply with our legal obligations or to perform a contract we have with you and you fail to provide that data when requested, we may not be able to perform the relevant contract (for example, to provide you with services). In this case, we may have to cancel the relevant contract.

Disclosure

We may have to share your personal data with third parties, including third party service providers.

We require third parties to respect the security of your data, keep it confidential, and to treat it in accordance with the law.

We will share your personal information with third parties where required by law, where it is necessary to perform a contract with you or where we have another legitimate interest in doing so.

We may share your personal data with the third parties set out below:

- Third party service providers, including hosting providers, IT support providers, analytics and search engine providers. Third party service providers are only permitted to process personal data for specified purposes and, where they are processing data on our behalf, in accordance with our instructions.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any agreements, or to protect the rights, property or safety of Fruition Harrogate, Students or other third parties. This includes exchanging information with other companies and organisations for the purposes of child protection, fraud protection and credit risk reduction, with Social Services, the Police, the NHS, HM Revenue & Customs, regulators and other authorities where we are required to do so by law.
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

We require all our data processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our data processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

The personal data that we collect from you may be transferred to, and stored at, a destination outside the UK. Whenever we transfer your personal data internationally, we shall ensure a similar degree of protection is afforded to your personal data by ensuring appropriate safeguards are implemented.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside of the UK.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed (including appropriate firewalls, encryption technology such as HTTPS, and passwords).

The transmission of information via the internet is not completely secure. We cannot guarantee the security of any data you send to us via email or via our website; any transmission is at your own risk so please take care before sending us any sensitive information in this way. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

In addition, the personal information you provide to us is only available to authorised personnel of Fruition Harrogate who need access to the information in order to fulfil their duties. They will only process your personal information on our instructions and they shall be subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Once we no longer require your personal information, we will take reasonable steps to destroy it in a secure manner.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will typically retain your personal data so long as you (or your child, if you are a parent/guardian) are enrolled on one of our Tuition Programmes. We will also keep some of your data on file for a period afterwards (usually the duration of your academic cycle or two years, if longer) in case you wish to re-enrol on a Tuition Programme or access your records.

If you are under the age of 18 at the time of attending a Tutoring Programme, we may keep certain personal data relating to you until you reach the age of 24. This is because the period in which legal claims can be brought is longer for children than for adults. The type of information we would keep for this long will be limited, but would include your identity and contact data, together with attendance registers and accident records.

We will also need to keep a record of your contact details if you have opted-out of receiving marketing communications from us to ensure we do not send these to you in future.

Your rights

You have the following rights in respect of the personal data that we process about you (where we determine the purpose and means for which that personal data shall be processed):

- the right to request **access** to your personal data that we hold and to receive certain information relating to that data;
- the right to ask us to **rectify** inaccurate data or to complete incomplete data;
- a right to receive or ask for your personal data to be **transferred** to a third party (note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you);
- the right to request the **erasure** of personal data where there is no good reason for us continuing to process it (note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request);
- the right to **object** to how we process your personal data where we believe we have a legitimate interest in processing it (note that in some cases we may demonstrate that we have compelling legitimate grounds to process your data which override your rights and freedoms);
- the right to **restrict** processing of your personal data in certain scenarios, for example if you want us to establish the accuracy of the data or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it; and
- where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to **withdraw your consent** for that specific processing at any time.

If you wish to exercise any of the rights set out above, please contact Fruition Harrogate directly. We may ask you to verify your identity if you make a request to us to exercise any of the rights set out above. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

How to complain

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

Please let us know if you are unhappy with how we have used your personal information by contacting Fruition Harrogate directly.

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance and we shall endeavour to resolve your complaint.

Changes to your data

We shall make every effort to ensure information collected is accurate and up-to-date. We encourage you to help us by telling us promptly if you change your contact details. You have the right to question any

information we hold about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

We will also send reminders to you on a termly basis (if you are a Student) to check the information we hold about you and to remind you to update us of any changes to your personal data that you have provided to us.

This Privacy Policy was last reviewed in July 2026.