

GDPR & Privacy Policy

This policy applies between You, the User of this Website and of Our Software “You, Your” and Complete Education Solutions “CES, We, Our, Us”, the owner and provider of this Website and Software. We take the privacy of Your information very seriously. This privacy policy applies to Our use of any and all Data collected by Us or provided by You in relation to Your use of the website or software.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: <https://www.completeeducationsolutions.uk/CES-Terms-Conditions>

Please read this privacy policy carefully

Definitions and Interpretation

1. In this privacy policy the following definitions are use:

Data	Collectively all information that you submit to CES via the Website. This definition includes the definitions provided in the Data Protection Laws.
Cookies	A small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this website are set out below under Cookies.
Data Protection Laws	Any applicable law relating to the process of personal Data including GDPR and any national laws, regulations, and secondary legislation.
GDPR	The UK General Data Protection Regulation, incorporated from EU Legislation.
Complete Education Solutions	CES a company incorporated in England and Wales under number 10631033 registered office located at Fairfield House, 104 Whitby Road, Ellesmere Port, Cheshire, CH65 0AB.
UK and EU Cookie Law	The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 and the Privacy and Electronic Communications (ED Directive) (Amendment) Regulation 2018.
User or You	Any third part that accesses the Website and is not either (i) employed by CES and acting in the course of the ir employment or (ii) engaged as a consultant or otherwise providing services to CES and accessing the Website in connection with the provision of such services.
Website/ Software	The Website that you are currently using, completeeducationsolutions.uk and any sub-domains of this site unless excluded by their own T&C and the Software refers to any software created or sold by CES.

2. In this privacy policy, unless the context requires a different interpretation:

- a. The singular includes the plural and vice versa.
- b. References to sub-clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy.

- c. A reference to a person includes firms, companies, government bodies, trusts and partnerships.
- d. “including” also means “including without limitation”.
- e. Reference to any statutory provision includes any modification or amendment of it.
- f. The headings and sub-headings do not form part of this privacy policy.

Scope of This Privacy Policy

3. This privacy policy applies only to the actions of CES and Users with respect to this Website and Software. It does not extend to any Website that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, CES is the “Data Controller”. This means that CES determines the purposes for which, and the way, Your Data is processed.

Data Collected

5. We may collect the following Data, which includes personal Data from You:
 - a. Name.
 - b. Date of birth.
 - c. Gender.
 - d. Contact information such as email address and phone numbers.
 - e. IP address.
 - f. Web browser type and version.
 - g. Operating system.
 - h. Information of children within the Software.
 - i. Financial data relating to bookings made.
 - j. Disability information.
 - k. Allergy Information.
 - l. Pupil premium status.
 - m. Language and Ethnicity information.

How We Collect Data

6. We collect Data in the following ways:
 - a. Data is given to Us by You.
 - b. Data is collected automatically.

Data That is Given to Us by You

7. CES will collect Your Data in a number of ways:
 - a. When You contact Us through the Website, phone, post, email or other means.
 - b. When You register with Us and set up an account to receive Our products/services.

- c. When You complete surveys that We use for research and development purposes (although You are not obliged to respond to them).
- d. When You make payments to Us, through Our Website, Software or directly.
- e. When You elect to receive marketing from Us.
- f. When You use Our services.

Data That is Collected Automatically

8. To the extent that You access the Website, We will collect Your Data automatically:
 - a. We automatically collect some information about Your visit. This Data helps Us to make improvements to content and navigation and includes Your IP Address, date, time, frequency, and the way in which You interact and use Our content.
 - b. We will collect Your Data automatically via cookies, in line with the cookies setting on Your browser.

Our Use of Data

9. Any or all of the above Data may be required by Us from time to time in order to provide You with the best possible service and experience when using Our Website and Software. Specifically, data may be used by Us for the following reasons:
 - a. Internal record keeping
 - b. Improvements to our services and products
 - c. Transmission by email of marketing materials
 - d. Contact for market research purposes
10. We may use Your Data for the above reasons if We deem it necessary to do so for Our legitimate interests. If You are not satisfied with this, You have the right to object in certain circumstances.
11. For the delivery of direct marketing to You, we'll need Your consent, whether via an opt-in or soft-opt-in;
 - a. soft opt-in consent is a specific type of consent which applies when You have previously engaged with Us (for example, You contact Us to ask Us for more details about a particular product/service, and We are marketing similar products/services). Under "soft opt-in" consent, We will take Your consent as given unless You opt-out.
 - b. for other types of e-marketing, We are required to obtain Your explicit consent; that is, You need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
 - c. if You are not satisfied about Our approach to marketing, You have the right to withdraw consent at any time. To find out how to withdraw Your consent, see the section headed "Your rights" below.
12. When You register with Us and set up an account to receive Our services, the legal basis for this processing is the performance of a contract between You and Us and/or taking steps, at Your request, to enter into such a contract.
13. We may use Your Data to show you CES adverts and other content on other websites. If You do not want Us to use Your data to show You adverts and other content on other websites, please turn off the relevant cookies.

Who We Share Data With

14. We may share Your Data with the following groups of people for the following reason:
 - a. Any of Our group companies or affiliates
 - i. To ensure the proper running of Our website and business.
 - ii. To ensure effective support can be provided between end users, customers and Us
 - b. Our employees agents and/or professional advisors
 - i. To help improve the system as a whole and relevant training requirements
 - ii. To obtain any advice from professional advisers
 - c. Third party service providers who provide services to Us which require the processing of personal data
 - i. To help third party service providers in receipt of any shared data to perform functions on Our behalf to help ensure the website and software runs smoothly.
 - ii. To help with development of Our services
 - d. Third party payment providers who process payments made over Our Website or Software
 - i. To enable third party payment providers to process user payments and refunds
 - e. Relevant authorities
 - i. To facilitate the detection of crime or the collection of taxes or duties

Keeping Data Secure

15. We will use technical and organisational measures to safeguard Your Data for example;
 - a. Access to Your account is controlled by a password and a user name that is unique to You.
 - b. We store Your Data on secure servers.
16. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to Your Data, please let Us know immediately via:
jamie@completeeducationsolutions.uk
17. If You want detailed information from Get Safe Online on how to protect Your information and Your computers and devices against fraud, identity theft, viruses and other online problems visit www.getsafeonline.org get Safe Online is supported by the UK Government and leading businesses.

Data Retention

18. Unless a longer retention period is required or permitted by law, We will only hold Your Data on Our systems for the period necessary to fulfil the purposes outlined in this policy or until You request that the Data be deleted.

19. Even if We delete Your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your Rights

20. You have the following rights;

- a. **Right to Access** – the right to request;
 - i. Copies of the information We hold about You at any time
 - ii. That We modify, update or delete such information.

If we provide You with access to the information We hold about You, We will not charge You for this unless Your request is unfounded or excessive. Where We are legally permitted to do so, We may refuse any request. If We refuse Your request You will be given the reasons why.

- b. **Right to Correct** – the right to have Your Data rectified if it is inaccurate or incomplete.
 - c. **Right to Erase** – the right to request Your Data is removed or deleted from Our system.
 - d. **Right to Restrict the use of Your Data** – Right to block Us from using Your Data or limit how it can be used.
 - e. **Right to Data Portability** - Right to request that We move, copy or transfer Your Data
 - f. **Right to Object** – Right to object to Our use of Your Data including where We use it for Our legitimate interests.
21. To make enquiries, exercise any of Your rights set out above, or withdraw Your consent to the processing of Your Data, please contact us via jamie@completeeducationsolutions.uk
22. If You are not satisfied with the way a complaint You make in relation to Your Data is handled, You may be able to refer Your complaint to the relevant data protection authority. For the UK this is the Information Commissioners Office – ice.org.uk
23. It is important that the Data we hold about You is accurate and current, please keep us informed of any changes to Your Data.

Transfers Outside the UK and EEA

24. Data which we collect from You may be stored and processed in and transferred to countries outside the UK and EEA. This could occur if our servers are located in a third party country or our service providers are outside the UK/EEA.
25. We will only transfer Data outside of the UK and EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to Your Data.
26. To ensure that Your Data receives an adequate level of protection, We have put in place appropriate safeguards and procedures with the third party companies we share Your Data with. This ensures that Your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

Links to Other Websites

27. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This policy does not extend to Your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of Business Ownership and Control

28. CES may from time to time, expand or reduce Our business and this may involve the sales and/or transfer of control of all or part of CES. Data provided by Users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this policy, be permitted to use the Data for the purposes for which it was originally supplied to Us.
29. We may also disclose Data to a prospective purchaser of Our business or any part of it.
30. In the above instances, we will take steps with the aim of ensuring Your Data is protected.

Cookies

31. This Website may place and access certain Cookies on your computer. CES uses Cookies to improve Your experience of using the Website and to improve Our range of services. CES has carefully chosen these Cookies and has taken steps to ensure that Your privacy is protected and always respected.
32. All Cookies used by this Website are used in accordance with current UK law.
33. Before the Website places Cookies on Your computer, You will be presented with a message bar requesting Your consent to set those Cookies. By giving Your consent or continuing to use the Website, You are consenting to placement of the Cookies. You are enabling CES to provide a better experience and service to You. You may, if you wish, deny consent to the placement of Cookies however certain features of the Website will not function as intended.
34. Cookies We may place on Your PC;

Types of Cookie	Purpose
Strictly necessary	These are required for the operation of Our Website. They include cookies that enable You to log into secure areas of Our Website / Software etc
Analytical and performance	These enable Us to recognise and count the number of visitors and see how they react on Our Website. This helps to improve the way Our Website operates.
Functionality	These recognise You on returning to the Website. This enables Us to personalise Our content for You.
Targeting	These record Your Visit, the pages You visit and the links You have followed. We use this information to make our website and the

	advertising displayed on it more relevant to Your interests. We may also share this information with third parties.
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35. You can disable or enable Cookies in Your browser. By default, most internet browsers accept Cookies but this can be changed.
36. You can choose to delete Cookies at any time, however You may lose any information that enables You to access the Website more quickly and efficiently including to but not limited to personalisation settings.
37. For more information on cookies, see aboutcookies.org