

About Us

This is the Student Privacy Policy for Kip McGrath Education Centres Brighouse.

Kip McGrath Education Centres is a global brand delivering bespoke educational tutoring programmes to individuals (**Students**) through a franchise model worldwide. The Franchisor is Kip McGrath Education Centres Ltd, an Australian company, 73 003 415 889, of Level 3, 6 Newcomen Street, Newcastle, NSW 2300 (**KMEC**).

The KMEC group of companies (the **KMEC Group**) includes Kip McGrath Education Australia Centres Ltd and Kip McGrath Education UK Ltd (the **KMEC UK Head Office**) and their respective holding companies and subsidiaries from time to time.

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.

The Kip McGrath Tutoring Programmes are delivered by franchisees in accordance with the guidelines and standards developed by the KMEC Group. Francis Page and Debra Page is the Kip McGrath franchisee who you have engaged (or are considering engaging) to provide the Tutoring Programme to you or your child. The Kip McGrath Centre 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.

References in this Privacy Policy to the "we", "us" and "our" are to the KMEC Group and the Kip McGrath Centre.

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. If you use the student portal, we may also collect personal data about you through that portal (please refer to our Website Privacy Policy and Cookies Policy for further information: www.kipmcgrath.co.uk).

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 the Kip McGrath Centre, 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.

For Students based in the UK, both the KMEC UK Head Office and the Kip McGrath Centre are each likely to be controller of your personal data.

If you have any concerns or complaints about the services provided by, or communications you have received from, the Kip McGrath Centre, please contact Kip McGrath Brighthouse in the first instance.

Alternatively, you are welcome to contact the KMEC UK Head Office with any queries or concerns. Please email us at ukandirelandheadoffice@kip-mcgrath.co.uk or write to:

Kip McGrath Education Centres UK Head Office
Railway House
Bruton Way
Gloucester
GL1 1DG

You can also telephone us on 01452 382282

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

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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:

<u>Type of personal data</u>	<u>Description</u>
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, Kip McGrath 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)

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<p>Parent/Guardian Data</p>	<p>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).</p>
<p>Marketing and Communications Data</p> <p>Educational Data</p>	<p>Data which we capture when you sign up to newsletters, including your preferences regarding receiving marketing and communications from us</p> <p>Information about the Student's education history and academic cycle (school, year group, status, abilities and progress)</p>
<p><u>Type of personal data</u></p>	<p><u>Description</u></p>
<p>Assessment and Attainment Data</p>	<p>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)</p>

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 and 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you require further detail about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<u>What we use your personal information for</u>	<u>Type of data</u>	<u>Lawful basis for processing</u>	<u>Basis of legitimate interest (where applicable)</u>

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<p>To manage our relationship with you, this will include notifying you about changes to our terms or Privacy Policy.</p> <p>To set you up as a new Student on our systems</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Tuition • Parent/Guardian • Marketing and Communications 	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary for our legitimate interests <p>☐ Consent – given at the time of submitting an enrolment form</p>	<p>To conduct our business and to keep our records updated</p> <p>To conduct our business and deliver the Tuition</p>
<p><u>What we use your personal information for</u></p>	<p><u>Type of data</u></p>	<p><u>Lawful basis for processing</u></p>	<p><u>Basis of legitimate interest (where applicable)</u></p>
	<ul style="list-style-type: none"> • Parent/Guardian • Educational • Assessment and Attainment • Ancillary • Safeguarding • Marketing and Communications 	<ul style="list-style-type: none"> • Necessary for our legitimate interests • Necessary for the performance of a contract with you 	<p>Programmes to Students</p>

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<p>To contact named individuals in the event of an emergency</p>	<p>lesson cancellations, change of tutor or change of Kip</p> <ul style="list-style-type: none"> • Identity • Parent/Guardian • Consent – given • Medical 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 	<p>Communications ☐ Ancillary</p> <p>To safeguard Students in our care and operate our business in accordance with appropriate standards</p>
<p>To correspond with you regarding any changes to the Tutoring Programme, such as</p>	<ul style="list-style-type: none"> • Necessary for our • Identity legitimate interests • Contact • Necessary for the • Profile performance of a • Tuition contract with you • Parent/Guardian • Marketing and 	<p>To conduct our business and deliver the Tuition Programmes to Students</p>
<p><u>What we use your personal information for</u></p>	<p><u>Type of data</u></p> <p><u>Lawful basis for processing</u></p>	<p><u>Basis of legitimate interest (where applicable)</u></p>

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<p>McGrath Centre operator and to otherwise keep you updated and informed.</p> <p>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 the Kip McGrath Centre</p>	<ul style="list-style-type: none"> • • Identity • • Tuition • Medical Ancillary Safeguarding <ul style="list-style-type: none"> • 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 	<p>To safeguard children in our care and operate our business in accordance with appropriate standards</p>
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<p>To allow individuals named on a submitted enrolment form to collect Students from the Kip McGrath Centre by using a password</p>	<ul style="list-style-type: none"> • Identity • Contact • Parent/Guardian Ancillary Safeguarding 	<ul style="list-style-type: none"> • Consent – given at the time of submitting an enrolment form Necessary for our legitimate interests Necessary for the performance of a contract with you 	<p>To ensure the safety of Students and to operate our business in accordance with appropriate standards</p>
<p><u>What we use your personal information for</u></p>	<p><u>Type of data</u></p>	<p><u>Lawful basis for processing</u></p>	<p><u>Basis of legitimate interest (where applicable)</u></p>
<p>To track Student progress and provide feedback to Students' parents/guardians</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Parent/Guardian • Tuition • Educational • Assessment and Attainment 	<ul style="list-style-type: none"> • Necessary for our legitimate interests • Necessary for the performance of a contract with you 	<p>To conduct our business and improve our services</p>

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<p>To otherwise provide the Tuition Programmes to Students</p>	<ul style="list-style-type: none"> • Identity • Contact • Tuition • Profile • Educational • Assessment and Attainment • Transactional 	<ul style="list-style-type: none"> • Necessary for our legitimate interests • Necessary for the performance of a contract with you 	<p>To conduct our business and deliver the Tuition Programmes</p>
<p>To process and manage fees and charges on Student accounts</p>	<ul style="list-style-type: none"> • Identity • Contact • Tuition • Financial • Transaction 	<ul style="list-style-type: none"> • Necessary for our legitimate interests • Necessary for the performance of a contract with you 	<p>To conduct our business, process payments and recover debts due to us</p>
<p>To deal with and respond to queries submitted to us via our website, by post, email or by telephone</p>	<ul style="list-style-type: none"> • Identity • Contact • Parent/Guardian • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Consent – given at the time of contact • Necessary for our legitimate interests 	<p>To conduct our business and improve our services</p>

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<u>What we use your personal information for</u>	<u>Type of data</u>	<u>Lawful basis for processing</u>	<u>Basis of legitimate interest (where applicable)</u>
<p>To recommend similar products and services and offer discounts and incentives that may be of interest to you</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Parent/Guardian • Marketing and Communications 	<ul style="list-style-type: none"> • Consent – given at the time of enrolment and/or • Necessary for our legitimate interests 	<p>To develop our products/services and grow our business, provided you will always be offered the opportunity to opt-out of such marketing communications</p>
<p>To include information relating to you within internal communications (between and within the KMEC Group and the Kip McGrath Centre) (including Programme Identity and Kip McGrath Centre Newsletter)</p>	<ul style="list-style-type: none"> • Identity • Profile 	<ul style="list-style-type: none"> □ Consent – given at the time of enrolment 	

If applicable

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[CCTV footage
(when you enter and
exit the building)]
Identity

[Necessary for our [For
legitimate security of our
buildings]

ensuring the
interests]

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;
- Contacting KipMcGrath Education Centres Brighthouse on the following email address brighthouse@kipmcgrath.co.uk

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.

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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 and other group companies.

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.

Your personal data will be shared by and between the Kip McGrath Centre and the KMEC Group for the purposes of operating and administering the Kip McGrath Centre and delivering Tuition Programmes (including as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data).

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.
- Another franchisee of the KMEC Group who takes over the operation of the Kip McGrath Centre or to whom your contractual relationship with the Kip McGrath Centre is transferred.
- 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 the KMEC Group, the Kip McGrath Centre, 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

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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 as set out in our data sharing agreements.

In some instances where we share data with third parties, such as Government departments and public bodies, those third parties will also be controllers of your data. We shall not be responsible or liable for the way in which other data controllers hold or process your personal data. Please contact those third parties for further information regarding how they will use your data. We shall only share your personal data with third parties in accordance with this privacy policy.

International transfers

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). In particular, data hosted by the KMEC Group will be transferred to and processed in Australia.

Whenever we transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to your personal data by ensuring at least one of the following safeguards is implemented:

- Where we need to transfer your personal data intra-group transfers, we may put in place binding corporate rules which shall ensure that your personal data is afforded the same level of protection as it has within the EEA. For further details, see [European Commission: Binding Corporate Rules](#).
- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in nonEU countries](#).
- In some instances, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the EEA. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

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- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EEA and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

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

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 the KMEC Group and the Kip McGrath Centre 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.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) in order to develop our business methods and strategy or for research or

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statistical purposes, in which case we may use this information indefinitely without further notice to you.

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 (ie for so long as you remain in education) or two years, if longer) in case you wish to re-enroll on a Tuition Programme or access your records (including your Contact, Identity, Profile, Education, Assessment and Attainment and Tuition Data). We will keep this under review and may periodically delete some of your personal data which we no longer require for the purposes set out in the table above.

In some circumstances we may be entitled to retain your data for a longer period in order to respond to you questions or complaints, to demonstrate we treated you fairly, to maintain records according to rules which apply to us and/or where we are under a legal obligation to do so, for example in the event of a legal dispute.

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 for the purpose of establishing, exercising or defending legal claims 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.

We shall have no liability to you for any deletion of your personal data in accordance with our retention policy.

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;

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- 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 (as explained above) (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 (note that when processing is restricted, we are allowed to retain sufficient information about you to ensure that the restriction is respected in future; 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. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you withdraw your consent, we may not be able to provide certain services to you.

Designated Subject Access Request,

If you wish to make a subject access request please email us at brighthouse@kipmcgrath.co.uk or write to us at the following address: First Floor, 74 Bradford Road, BRIGHOUSE, HD6 4AA

If you wish to exercise any of the other rights set out above, please contact us at ukandireland@kip-mcgrath.co.uk

We may ask you to verify your identity if you make a request to us to exercise any of the rights set out above. We may also contact you to ask you for further information in relation to your request to speed up our response. 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. Alternatively, we may refuse to comply with your request in these circumstances.

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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. We would also welcome any suggestions for improving our procedures.

Please let us know if you are unhappy with how we have used your personal information. You may contact us via email brighthouse@kipmcgrath.co.uk or write to us at the following address: First Floor, 74 Bradford Road, BRIGHOUSE, HD6 4AA

The current complaints policy and form can be found on our national website: www.kipmcgrath.co.uk

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 updated in **May 2018**.