



Privacy Policy

Policy owner: Beverley Grannell

Data controller: Beverley Grannell

Contact: braeducation@gmail.com

Effective date: 20 September 2026

Next review: September 2027

Version: 1.0

1. INTRODUCTION

Brae Education is committed to protecting the privacy and personal information of learners, parents, carers and visitors to our website.

This Privacy Policy explains what personal information we collect, why we collect it, how we use and store it, and the rights individuals have in relation to their information.

Brae Education provides tutoring, educational support and digital learning resources. Our services may involve processing information about children and young people, including information about their educational needs.

We recognise that children's personal information requires particular care and protection.

Brae Education processes personal information in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

2. WHO IS RESPONSIBLE FOR YOUR INFORMATION?

Brae Education is operated by Beverley Grannell as a sole-trader education business.

Beverley Grannell is the data controller responsible for determining how and why personal information is processed by Brae Education.

Data controller: Beverley Grannell, trading as Brae Education

Email: braeeducation@gmail.com

Questions about this policy or the handling of personal information can be directed to this email address.

3. WHAT INFORMATION DO WE COLLECT?

The information collected depends on how an individual interacts with Brae Education.

We may collect the following categories of information.

Contact and identification information

- Names of parents, carers and learners.
- Email addresses and telephone numbers.

- Billing information.
- Relevant contact preferences.
- Information provided through website enquiry forms.

Educational information

- Learner age or school year.
- Subjects and qualifications being studied.
- Educational goals and areas requiring support.
- Progress notes and assessment information.
- Submitted essays, assignments and other educational work.
- Relevant information about previous learning experiences.

Additional learning and support needs

Where relevant to providing appropriate educational support, we may collect information about:

- Special educational needs and disabilities (SEND).
- Learning differences.
- Accessibility requirements.
- Relevant health or developmental information voluntarily provided by a learner, parent or carer.
- Reasonable adjustments required for tutoring.

We aim to collect only the information necessary to understand and support the learner's educational needs.

Booking and payment information

We may collect information about tutoring bookings, purchased resources, payments, refunds and transaction history.

Payments made through the Brae Education website are handled by Wix and its connected payment providers.

Brae Education does not intentionally collect or store customers' complete payment-card details.

Website and technical information

When someone visits our website, Wix and connected services may collect technical information such as IP addresses, device information, browser information and website activity.

Further information about cookies and similar technologies is provided in our Cookies Policy.

4. HOW DO WE COLLECT INFORMATION?

Personal information may be collected when someone:

- Completes a website contact form.
- Books an introductory session or tutoring lesson.
- Purchases a digital resource or educational product.
- Creates a website account.
- Submits educational work.
- Communicates with Brae Education by email or business telephone.
- Provides information during an introductory session or tutoring lesson.
- Subscribes to marketing communications.
- Uses the Brae Education website.

Information about a child will generally be provided by their parent or carer, although learners may also provide information directly during educational activities.

We may also receive information from a learner's parent or carer, or another person involved in arranging their education, where appropriate.

5. WHY DO WE USE PERSONAL INFORMATION?

Brae Education uses personal information to:

- Respond to enquiries.
- Arrange and deliver tutoring.
- Understand learners' educational needs.
- Adapt teaching and learning resources.
- Monitor educational progress.
- Provide feedback to learners and parents or carers.
- Manage bookings, payments and purchases.
- Deliver digital educational products.
- Maintain appropriate safeguarding arrangements.
- Respond to complaints or concerns.
- Maintain business and financial records.
- Operate and improve the website.
- Send optional marketing communications where appropriate consent has been obtained.

We will not use personal information for purposes incompatible with those explained in this policy without first considering the applicable legal requirements and, where necessary, providing further information or obtaining consent.

6. OUR LAWFUL BASES FOR PROCESSING INFORMATION

Under UK GDPR, Brae Education must have an appropriate lawful basis for processing personal information.

Different lawful bases may apply depending on the purpose for which information is used.

Contract

We process information where necessary to provide tutoring or educational products that an individual has purchased or requested, or to take steps before entering into a contract.

This may include arranging lessons, maintaining booking records, delivering resources and communicating about purchased services.

Legitimate interests

We may process information where necessary for Brae Education's legitimate interests, provided those interests are not overridden by the rights and freedoms of the individuals concerned.

This may include responding to enquiries, maintaining appropriate educational records, managing routine business operations and protecting the safety of learners.

Where children's information is involved, their interests and rights will receive particular consideration.

Legal obligations

We process certain information where necessary to comply with applicable legal requirements.

This may include financial record-keeping, responding to legally valid requests and meeting relevant data protection obligations.

Consent

We rely on consent where required, including for optional email marketing and certain uses of sensitive personal information.

Consent can be withdrawn by contacting Brae Education.

Withdrawal does not affect processing that was lawful before consent was withdrawn.

7. SEND, DISABILITY AND SENSITIVE INFORMATION

Some information about SEND, disabilities or health may qualify as special category personal data under UK GDPR.

This information receives additional protection.

Brae Education may collect relevant information about a learner's additional needs to understand how best to support their education and make appropriate adjustments.

We will not request detailed medical information where a description of the learner's practical educational needs would be sufficient.

Where we rely on explicit consent to process special category information for personalised educational support, we will request that consent separately and explain what information is needed and why.

Where information must be processed for safeguarding purposes, a different lawful basis and additional legal condition may apply, depending on the circumstances.

Information about a learner's additional needs will not be used for marketing purposes.

8. CHILDREN'S PERSONAL INFORMATION

Brae Education provides educational services to children and young people.

We recognise that children have their own data protection rights and that information about them must be handled fairly, transparently and with appropriate safeguards.

For learners under 18, bookings, payments and routine administrative communications will generally be managed through their parent or carer.

Where appropriate, privacy information will also be explained directly to learners

in language they can understand.

We will consider the learner's age, understanding and circumstances when responding to requests concerning their information.

We will not assume that a parent or carer is automatically entitled to access every piece of information a child has shared, particularly where disclosure could create a safeguarding concern.

9. HOW WE STORE PERSONAL INFORMATION

Brae Education uses a combination of secure digital services and local storage to manage educational and business information.

Depending on the purpose, information may be stored using:

Wix

For website enquiries, bookings, purchases, account information and educational submissions where supported by the website's features.

Google Drive

For educational materials, submitted work, progress records and relevant learner information.

Secure local storage

For working copies, educational records and backups where necessary.

Local storage will be protected through appropriate device security and access controls.

Business email

For enquiries, administrative communications and educational correspondence.

We aim to limit access to personal information and use appropriate security measures, including password protection, access controls and account security features.

No digital storage or transmission method can be guaranteed to be completely secure.

10. ONLINE TUTORING

Brae Education uses Google Meet and other agreed professional digital services to deliver online tutoring.

Online sessions may involve processing a learner's name, image, voice and information shared during the lesson.

Sessions are not routinely recorded.

Where recording is proposed for a particular educational purpose, an appropriate prior agreement will be obtained.

Learners and parents or carers must not record or distribute tutoring sessions without permission.

Safeguarding concerns arising during online sessions will be handled in accordance with Brae Education's Safeguarding & Child Protection Policy.

11. SHARING PERSONAL INFORMATION

Brae Education does not sell personal information.

We may share information with trusted service providers where necessary to operate the business and deliver educational services.

These may include:

- Wix and its connected website services.
- Payment providers connected to Wix.
- Google services used for online tutoring, email or file storage.
- Other professional service providers where necessary for business administration.

Service providers may process information on our behalf or, in some circumstances, act as independent data controllers.

We may also share relevant information with children's social care, police or other appropriate agencies where necessary to protect a learner or comply with applicable law.

We will not disclose learner information to unrelated third parties for their own marketing purposes.

12. INTERNATIONAL DATA TRANSFERS

Some of the digital services used by Brae Education may process or store information outside the United Kingdom.

Where personal information is transferred internationally, Brae Education will take account of the applicable UK data protection requirements and the safeguards used by its service providers.

These may include transfers to countries covered by UK adequacy regulations or other appropriate transfer safeguards.

Information about relevant service-provider arrangements may be requested using the contact details in this policy.

13. HOW LONG DO WE KEEP INFORMATION?

Brae Education retains personal information only for as long as necessary for the purposes for which it was collected, including applicable legal, safeguarding and business requirements.

Our general retention periods are:

Enquiries that do not result in bookings

Information will ordinarily be retained for up to 12 months after the last contact, unless there is a legitimate reason to retain it for longer.

Learner work and progress notes

Educational work, progress notes and routine learner records will ordinarily be retained for up to two years after tutoring ends.

SEND, disability and additional learning needs information

This information will ordinarily be retained for up to two years after tutoring ends, or deleted earlier where it is no longer needed.

Financial records

Financial and transaction records will be retained for the period required by applicable tax and accounting legislation.

For self-employed tax records, this will generally be at least five years after the relevant 31 January Self Assessment submission deadline.

Safeguarding records

Safeguarding records will be stored separately where practicable and retained in accordance with their nature, relevant safeguarding guidance and any applicable legal requirements.

They will not automatically be deleted when routine tutoring records reach the end of their retention period.

Marketing information

Marketing contact information will be retained while the individual remains subscribed and the information continues to be needed.

Individuals may unsubscribe at any time.

Where an individual opts out, Brae Education may retain the minimum information necessary to ensure that they are not contacted again for marketing purposes.

Information will be securely deleted or anonymised when it is no longer required, subject to applicable legal or safeguarding requirements.

| 4. MARKETING COMMUNICATION

Brae Education may offer newsletters, educational updates, new resources or information about its services.

Marketing emails will only be sent where an appropriate legal basis exists and applicable electronic marketing rules are satisfied.

Where consent is used, individuals will be given a clear opportunity to opt in.

Marketing consent will not be made a condition of purchasing tutoring or educational resources.

Every marketing email will provide an appropriate way to unsubscribe.

Individuals can also request removal from marketing communications by emailing braeeducation@gmail.com.

We will not use information about a child's SEND, disability or health for marketing purposes.

15. COOKIES AND WEBSITE ANALYTICS

The Brae Education website is hosted through Wix.

Wix and connected website features may use cookies or similar technologies to support website functionality, security, bookings, payments and website analytics.

Some cookies may be essential to the operation of the website.

Other cookies may require consent before they are used.

Further information will be provided in Brae Education's Cookies Policy and, where applicable, through the website's cookie consent controls.

16. YOUR DATA PROTECTION RIGHTS

Individuals have rights concerning their personal information under UK GDPR.

Depending on the circumstances, these may include the right to:

- Be informed about how personal information is used.
- Request access to personal information.
- Request correction of inaccurate information.
- Request deletion of information.
- Request restriction of processing.
- Object to certain processing.
- Request data portability where applicable.
- Withdraw consent where processing relies on consent.

These rights are not absolute and may be subject to applicable legal exceptions.

Requests can be made by emailing:

braeeducation@gmail.com

Brae Education may need to verify the identity or authority of a person making a request before disclosing personal information.

We will respond within the time limits required by applicable data protection legislation.

17. SAFEGUARDING AND CONFIDENTIALITY

Brae Education respects the confidentiality of learners and their families.

However, information may need to be shared where there is a concern that a child or young person is at risk of harm.

Safeguarding information will be handled sensitively and shared only where appropriate.

Parental permission will not be sought before a safeguarding referral where doing so could place a learner at greater risk or delay necessary protective action.

Further information is available in Brae Education's Safeguarding & Child Protection Policy.

18. COMPLAINTS ABOUT PERSONAL INFORMATION

Anyone concerned about how Brae Education handles personal information is encouraged to contact us so that the concern can be considered.

Email: braeeducation@gmail.com

Individuals also have the right to raise a complaint with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

19. CHANGES TO THIS POLICY

Brae Education may update this Privacy Policy to reflect changes in its services, technology, business arrangements or applicable legal requirements.

The current version will be made available through the Brae Education website.

Where changes materially affect how personal information is used, additional notice will be provided where appropriate.

Next scheduled review: September 2027.

Reference guidance

Information Commissioner's Office. *A guide to lawful basis*.

Information Commissioner's Office. *Children and the UK GDPR*.

Information Commissioner's Office. *Special category data*.

Information Commissioner's Office. *Your right to be informed*.