



First Coding Ltd - Data Protection Policy

Purpose

The purpose of this Data Protection Policy is to explain how First Coding (referred to as "we," "us," or "our") collects, processes, stores, and protects personal data. This policy ensures compliance with the General Data Protection Regulation (GDPR) and other relevant privacy laws.

Scope

This policy applies to all employees, contractors, and third parties working on behalf of First Coding. It covers all personal data that we process, whether it is in electronic or physical form, and applies to in-person and online services.

Definitions

Personal Data: Any information that identifies an individual, such as name, email address, phone number, or IP address.

Processing: Any operation performed on personal data, such as collection, storage, use, or deletion.

Data Subject: The individual whose personal data is being processed.

Data Controller: The entity that determines the purposes and means of processing personal data.

Data Processor: Any third party who processes personal data on behalf of the Data Controller.

Data We Collect

We may collect the following types of personal data:

- Name
- Contact information (email address, phone number, physical address)
- Payment details
- Tutoring session details (such as possible recorded sessions, learning progress, and feedback)

How We Collect

We collect personal data through the following methods:

- Direct interactions: via online forms, emails, phone calls, or in-person meetings.
- Third-party sources: such as payment processors or scheduling/booking tools.

Purposes for Personal Data

We process personal data to:

- Provide tutoring services both online and in-person.
- Manage client relationships, including scheduling and invoicing.
- Improve the quality of our services through session feedback and assessments.
- Ensure online security and prevent fraud.

- Comply with legal obligations.
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Data Retention

Personal data will be retained for as long as necessary for the purposes outlined in this policy or as required by law. After the retention period, data will be securely deleted or anonymised.

Data Security

We are committed to ensuring the security of personal data by implementing the following measures:

- Encryption for online transactions and communications.
 - Secure password protection for systems accessing client data.
 - Regular software updates and security patching.
 - Access control measures (only authorized personnel can access personal data).
 - Data backups to prevent loss.
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Data Rights

Individuals have the following rights regarding their personal data:

- **Access:** The right to request a copy of personal data we hold.
- **Rectification:** The right to correct inaccurate or incomplete data.
- **Erasure:** The right to request deletion of personal data in certain circumstances.
- **Restriction of Processing:** The right to restrict how we use personal data.

- **Data Portability:** The right to receive personal data in a portable format.
 - **Objection:** The right to object to the processing of personal data for direct marketing or other legitimate interests.
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Breach Notification

In the event of a data breach, we will:

- Notify the relevant supervisory authority within 72 hours of becoming aware of the breach, where required.
 - Notify affected data subjects if the breach is likely to result in a high risk to their rights and freedoms.
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First Coding Ltd is committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 10/10/24

Signed: J Whitworth

Date: 10/10/24