Infinite Tutors Ltd

Privacy Policy

Version: 1.2
Effective Date: 15 September 2026
Last Reviewed: 15 September 2026

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1. Introduction

Infinite Tutors Ltd ("Infinite Tutors", "we", "our", or "us") is committed to protecting your privacy and handling your personal information responsibly.

This Privacy Policy explains how we collect, use, store and protect personal data when you use our services, website or online platforms.

It also explains your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Data Controller

The data controller responsible for your personal information is:

Infinite Tutors Ltd

Company Number: 14239382
Registered Address: 27 Maundeby Walk, London, NW10 2TG, United Kingdom
ICO Registration Number: C1992303
Data Protection Contact: Kaif-Aly Smith
Email: kaif@infinitetutors.org
Infinite Tutors is registered with the Information Commissioner's Office as a data controller and pays the annual data protection fee.

3. Who This Policy Applies To

This policy applies to:

- Parents and guardians
- Students
- Adult learners
- Tutors
- Website visitors
- Schools
- Academy partners
- Prospective clients
- Business contacts

4. Personal Information We Collect

Depending on the services provided, we may collect:

Identity information

- Name

- Date of birth
- Parent or guardian details
- Emergency contact details

Contact information

- Email address
- Telephone number
- Postal address

Educational information

- School or college
- Year group
- Subjects studied
- Examination board
- Academic performance
- Learning Profile Assessment results
- Tutor notes and lesson records
- Progress reports
- Homework records
- Knowledge assessment results and written answers submitted for marking
- School reports uploaded by a parent or guardian

Special category and sensitive information

Where relevant to supporting a student properly, and only where we have a lawful basis to do so, we may also process:

- Information about a diagnosed or suspected special educational need or disability, including ADHD, autism and dyslexia
- Information contained in an Education, Health and Care Plan (EHCP) or educational psychology report where a parent chooses to share it
- Relevant health information affecting learning or participation
- Safeguarding information where a concern arises

Information about health, including SEND and neurodevelopmental conditions, is special category data and receives additional protection as set out in section 8.

Technical information

When using our website or online platforms we may collect:

- IP address
- Browser type
- Device information
- Login information
- Usage statistics
- Cookies where applicable

Payment information

Payment details may be processed by our payment providers. Infinite Tutors does not store full debit or credit card details.

5. How We Collect Information

We collect information when:

- You contact us.
- You complete an enquiry form.

- You book tuition.
- You register on our online platform.
- You or your child complete assessments.
- Tutors submit lesson reports.
- Parents communicate with us or upload documents.
- Schools or organisations refer students.
- You use our website.

6. How We Use Your Information

We use personal information to:

- Deliver tutoring services.
- Match students with tutors.
- Schedule lessons.
- Produce learning reports.
- Operate the Learning Profile Assessment.
- Operate the online assessment dashboard.
- Mark submitted work, including by automated means as described in section 10.
- Monitor student progress.
- Respond to enquiries.
- Process payments.
- Improve our services.
- Meet legal obligations.
- Safeguard children.

7. Lawful Bases for Processing

Under UK GDPR we rely on one or more of the following lawful bases for general personal data:

- Performance of a contract — to deliver the tuition services you have booked.
- Legitimate interests — to operate, improve and secure our services, where these interests are not overridden by your rights.
- Legal obligation — to comply with our safeguarding, tax and regulatory duties.
- Consent — where we rely on consent, for example for marketing communications or the use of a student's image, which may be withdrawn at any time.

8. Special Category Data

Information about health, including SEND, ADHD, autism, dyslexia and related needs, is special category data under Article 9 of the UK GDPR. Processing this data requires both a lawful basis under Article 6 and a separate condition under Article 9.

Where we process special category data we rely on:

- Explicit consent from the parent, guardian or adult learner, where information is shared with us voluntarily so that we can tailor support; and/or
- Substantial public interest — safeguarding of children and of individuals at risk, as provided for in Schedule 1 of the Data Protection Act 2018, where information is processed to protect a child's welfare.

We maintain an appropriate policy document covering our processing of special category data under the substantial public interest condition, as required by the Data Protection Act 2018. You may request a copy using the contact details in section 19.

Where you have provided special category information on the basis of consent, you may withdraw that consent at any time. Withdrawal will not affect processing already carried out, and does not apply to information we are required to retain for safeguarding purposes.

9. Safeguarding

Protecting children is one of our legal and ethical responsibilities. Where safeguarding concerns arise, we may share relevant information with appropriate organisations or authorities, including children's social care, the Local Authority Designated Officer, the police and the Disclosure and Barring Service, where required by law or where necessary to protect a child.

In these circumstances we may share information without your consent, and in limited cases without notifying you in advance, where doing so would increase the risk to a child. Data protection law does not prevent the sharing of information for the purposes of keeping a child safe.

10. Use of Artificial Intelligence and Automated Processing

We use artificial intelligence tools to support parts of our service. Specifically:

- Extended written and mathematical answers submitted through our assessment platform may be sent to a third-party AI provider for automated marking against a mark scheme.
- AI tools may be used to help generate draft reports, learning profiles and teaching materials.

Where AI is used to mark or analyse a student's work:

- Work is submitted for marking purposes only and is not used by us to train AI models.
- Automated marks and AI-generated observations are reviewed by a qualified tutor before they form part of a student's record or any report shared with you.
- No decision producing legal or similarly significant effects for a student is made solely by automated means.
- You have the right to request human review of any automated mark, to express your point of view, and to contest the outcome.

Our AI processing provider is located outside the United Kingdom. Details of the safeguards applied to this transfer are set out in section 13.

11. Who We Share Information With

We only share personal information where necessary. This may include:

- Assigned tutors.
- Employees and authorised contractors.
- Schools, academies or local authorities where authorised by you or where we are commissioned to provide services.
- Parents or guardians.
- Examination centres (where relevant).
- Professional advisers.
- Law enforcement, children's social care or regulatory authorities where legally required or necessary to protect a child.

We also use trusted third-party service providers who process personal data on our behalf under written contracts and only in accordance with our instructions. These fall into the following categories:

- Cloud hosting and database providers, which store platform and student data.
- AI providers, which process submitted written work for automated marking as described in section 10.
- Email and communication providers.
- Payment processors.
- Video conferencing providers used to deliver online lessons.
- Business and administrative software providers.

A current list of the specific providers we use is available on request.

We do not sell personal information, and we do not share student data with advertisers.

12. Tutor Access to Student Data

Tutors can only access data relating to students they are assigned to. Access controls are enforced at the database level as well as within the user interface. Tutors are contractually required to keep student information confidential and to process it only for the purpose of delivering tuition.

13. International Transfers

Some of our service providers process personal data outside the United Kingdom, including in the United States. This includes the AI provider used for automated marking described in section 10, and may include cloud hosting and communication providers.

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place as required by UK GDPR, which may include transfers to countries covered by UK adequacy regulations, or the use of the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. You may request further information about these safeguards using the contact details in section 19.

14. Data Security

We take appropriate technical and organisational measures to protect personal information, including:

- Password-protected systems.
- Secure cloud storage.
- Role-based access controls enforced at database level.
- Restricted staff access on a need-to-know basis.
- Encryption in transit and at rest where appropriate.
- Regular software updates.

Although no electronic system can be guaranteed to be completely secure, we take reasonable steps to minimise risk.

Data breaches

If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will report it to the Information Commissioner's Office without undue delay and within 72 hours of becoming aware of it where required. Where a breach is likely to result in a high risk to you or your child, we will inform you directly without undue delay.

15. Data Retention

We retain personal information only for as long as reasonably necessary. Our retention periods are:

- Student educational records, including assessments, reports and lesson records: retained for the duration of the tuition relationship and for 3 years afterwards, then securely deleted.
- Safeguarding and child protection records: retained until the student's 25th birthday. Records of allegations against adults working with children, and records of child protection referrals, are retained for a minimum of 40 years.
- Financial and accounting records, including invoices: retained for 6 years plus the current financial year, as required by HMRC.
- Tutor vetting records, including DBS check details: retained for the duration of engagement and for 6 years afterwards.
- Enquiry and prospective client data where no service is taken up: retained for 12 months.
- Marketing consents and related contact data: retained until consent is withdrawn.
- Lesson recordings, where consent has been given: retained for the specific period agreed at the point of consent and deleted thereafter.

When information is no longer required, it is securely deleted or anonymised. Safeguarding retention periods take precedence over erasure requests where we are required to retain records to protect children.

16. Your Rights

Under UK GDPR you have the right to:

- Access your personal data.
- Request correction of inaccurate information.
- Request erasure of your personal data in certain circumstances.
- Request restriction of processing.
- Object to processing based on legitimate interests.
- Request transfer of your personal data (data portability) where applicable.
- Withdraw consent where processing relies on consent.
- Request human review of an automated decision or mark.
- Lodge a complaint with us and, if unsatisfied, with the Information Commissioner's Office.

We will respond to a request to exercise these rights within one month. That period may be extended by up to two further months for complex requests, in which case we will tell you and explain why.

There is normally no charge for exercising your rights. We may charge a reasonable fee, or refuse to act, where a request is manifestly unfounded or excessive.

17. Children's Privacy

Much of our work involves children, and we take particular care with their data.

- For younger children, including primary-age students, information is provided by and accessed through the parent or guardian, and the child does not hold their own platform account.
- Older students may hold their own account in order to complete assessments and access learning materials. Parents and guardians retain visibility of their child's progress.
- Children have the same data protection rights as adults, including the right to access their own information. Where a child is capable of understanding their rights, we will normally deal with them directly, taking account of their age and maturity and the best interests of the child.
- Where a student completes private written reflections, these are used to inform support. What is visible to parents is limited to progress and themes rather than raw reflections, except where disclosure is necessary for safeguarding reasons.

We do not use children's data for marketing or profiling for commercial purposes.

18. Cookies

Our website may use cookies and similar technologies to improve functionality and understand website usage. Where legally required, users will be asked for consent before non-essential cookies are used. You can control cookies through your browser settings.

19. Contact and Data Protection Complaints

For questions about this Privacy Policy, to exercise your data protection rights, or to make a complaint about how we have handled personal data, please contact:

Infinite Tutors Ltd

Data Protection Contact: Kaif-Aly Smith

Email: kaif@infinitetutors.org

We will acknowledge any data protection complaint within 30 days of receipt, investigate it appropriately and tell you the outcome, in line with the requirements of the Data (Use and Access) Act 2025. Our full process is set out in our Complaints Policy. We accept complaints made by any reasonable means.

20. Information Commissioner's Office

If you are dissatisfied with how we have handled your personal information, you have the right to complain to the Information Commissioner's Office (ICO).

Website: https://ico.org.uk

Helpline: 0303 123 1113

We would, however, appreciate the opportunity to address your concerns first, and you are normally expected to raise your complaint with us before escalating to the ICO.

21. Third-Party Websites

Our website or communications may contain links to third-party websites. Infinite Tutors is not responsible for the privacy practices of external websites. Users should review the privacy policies of those organisations separately.

22. Changes to This Policy

We may update this Privacy Policy from time to time. Where changes are material, we will notify parents and guardians directly and, where appropriate, ask you to review and re-accept the updated policy. The latest version is always available on our platform and on request.

Approved by:

Kaif-Aly Smith

Director

Infinite Tutors Ltd