Saigol Education Ltd – Privacy Policy

Introduction

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information about who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

Controller

Saigol Education Limited (“SaigolEd”, “Kassoom”, "we", "us" or "our" in this privacy policy”) is the data controller and is responsible for certain personal data about you that we collect and use as a consequence of providing our services to you via our Platform as a Student, a Sponsor or a Client in accordance with our Client Terms, or where you use or browse our website as a User. Capitalised terms in this privacy policy shall have the same meaning as in the Client Terms or Tutor Terms (as the case may be), or as defined in the Key Terms table below.

We keep our privacy policy under regular review. This version was last updated on 9 June 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit

Key Terms

It would be helpful to start by explaining some key terms and references used in this policy:

Data protection officer	Melanie Grace - Melanie@saigoled.com
Data subject	The individual who the personal data relates to, for the purposes of this policy can be Students, Sponsor, Tutors or Users.
Personal data	Any information relating to an identified or identifiable individual.
Our services	The services we provide via our platform as set out in our Terms
User	Individual user or browser of our website(s)
You, your	Data subject who this policy applies to

Personal data we collect about you

We may collect a variety of information about you depending on what the status of our relationship with you is. We have summarised the different kinds of personal data collected for each of the categories of Data Subject that this policy applies to:

1) **Student (if under 18) :**

- **Identity Data**: includes name, username
- **Student Data**: age, date of birth, gender, country location, image, educational information .
- **Usage Data**: information about how you use our services, our website, IT, communication and other systems.
- **Contact Data**: includes contact email address, billing address and telephone numbers
- **Technical Data**: includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.

2) **Client (includes Student if over 18):**

- **Identity Data**: includes name, username,
- **Client Data**: age, date of birth, gender, country location, image, educational information
- **Usage Data**: information about how you use our services, our website, IT, communication and other systems.
- **Profile Data**: feedback, your contact history
- **Contact Data**: includes contact email address, billing address and telephone numbers
- **Financial Data**: includes bank account information and credit/debit card information
- **Transaction Data**: includes details about payments to and from you and other details of products and services you have purchased from us.
- **Marketing Data**: includes preferences in receiving marketing communications from us or third parties.
- **Technical Data**: includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.

3) Sponsors:

- **Identity Data**: includes name, username
- **Usage Data**: information about how you use our services, our website, IT, communication and other systems.
- **Contact Data**: includes email address, billing address and telephone numbers.
- **Transaction Data**: includes details about payments to and from you and other details of products and services you have purchased from us.
- **Marketing Data**: includes preferences in receiving marketing communications from us or third parties.
- **Technical Data**: includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.

4) Tutors:

- **Identity Data**: includes full name, username, age, gender, country location, image, position/role
- **Profile Data**: feedback, your contact history, image
- **Contact Data**: includes email address, postal address and telephone numbers.
- **Financial Data**: includes bank account information.
- **Tutor Data**: educational qualifications, screening outcome to test for suitability, gender, date of birth, age, country location, image
- **Usage Data**: information about how you use the services, our website, IT, communication and other systems and interactions with clients
- **Technical Data**: includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.
- **Transaction Data**: includes details about payments to and from you and other details of products and services you have purchased from us.

5) Users:

- **Technical Data**: includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on

each page, the device type, operating system, unique device identifiers, device settings, and geo-location data.

- **Usage Data**: information about how you use our services, our website, IT, communication and other systems.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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.

We do not collect any "Special Categories" of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to your organisation, or engaging you or your organisation to provide services to us.

How your personal data is collected

We collect some of this personal data directly from you in person for example by telephone, email and/or via our website. However, we may also collect information:

- from publicly accessible sources, such as publicly accessible websites;
- from third parties , including social media companies and data brokers
- from cookies on our website—for more information on our use of cookies, please see our cookie policy

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a lawful basis eg:

- for our legitimate interests or those of a third party.
- where you have given consent;
- to comply with our legal and regulatory obligations; or

- for the performance of a contract with you or to take steps at your request before entering into a contract. or

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	**Lawful basis**	**Type of data**
Providing services to you as a Sponsor in accordance with the Student Terms	To perform our contract with you or to take steps at your request before entering into a contract For our legitimate interest, i.e. to carry out our services	Identity Contact Profile Marketing Transaction Student Client
Facilitating the provision of Tutoring Services to you as a Student from a Tutor	To perform our contract with you or with your Sponsor to take steps at your request before entering into a contract For our legitimate interest, i.e. to carry out our services	Identity Student Client Contact
Providing our services to you in accordance with the Tutor Terms	To perform our contract with you or to take steps at your request before entering into a contract For our legitimate interest, i.e. to provide our services to Students and Sponsors	Identity Contact Financial Transaction Tutor

What we use your personal data for	Lawful basis	Type of data
Carrying out marketing of our services to You	Where you have provided us with your consent For our legitimate interest, i.e. to develop and grow our business	Identity Contact Marketing Student Client Sponsor
Preventing and detecting fraud against you or us	For our legitimate interest, ie to minimise fraud that could be damaging for you and/or us To comply with our legal and regulatory obligations.	Identity Contact Financial Transaction
To enforce legal rights or defend or undertake legal proceedings, or to provide information required relating to audits, enquiries or investigations by regulatory bodies.	To comply with our legal and regulatory obligations; For our legitimate interests, ie to protect our business, interests and rights to comply with our legal and regulatory obligations	Identity Contact Profile Financial Transaction
Operational reasons, such as improving efficiency, training quality control and security of our website.	For our legitimate interests , ie to be as efficient as we can so we can deliver the best service to you at the best price	Identity Contact Technical Usage
Statistical analysis to help us manage our business	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price	Technical Usage

Kassoom as a Data Processor

Clients and Tutors conclude contracts directly for the provision of Tutoring Services. The tutoring sessions take place on the basis of these contracts via Zoom online video conferences (the Zoom service provider sends automated meeting links and automatically collects data on participation in the conferences).

We act as a data processor of the personal data exchanged during the Tutorials as the processing is largely carried out via our platform.

Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, referral rewards, promotions or new services or to send your our newsletter.

We may need your consent to send you marketing information, in which case we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at melanie@saigoled.com;
- if available, using the 'unsubscribe' link in emails or 'STOP' number in texts**.**

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services, eg payment service providers such as Stripe, Hubspot our CRM provider, Zoom, Calendly, Aircall ;
- In the case of Students and Clients we share your personal data with Tutors;

- In the case of Tutors we share your personal data with Students Clients and Sponsors;
- other third parties we use to help us run our business, eg marketing agencies or website hosts and IT and systems administrators and social media companies;
- our bank.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- Marketing Companies and Online Advertising – Helping us to manage our electronic communications to you and to help us show you the advertising you are most likely to be interested in, Companies that provide marketing and advertising assistance (including management of email marketing operations, mobile messaging services such as SMS, and services that deploy advertising on the internet or social media platforms, such as Facebook, Instagram and Google) as well as analysis of the effectiveness of our advertising and communications campaigns.
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Where your personal data is held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above.

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this happens, see below.

How long your personal data will be kept

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a

complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Please contact us: Melanie at Melanie@saigoled.com if you want further information about how long we will retain your personal data.

Transferring your personal data out of the UK

It is sometimes necessary for us to transfer your personal data to countries outside the UK, for example to our Tutors. In those cases we will comply with applicable UK laws designed to ensure the privacy of your personal data.

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us: Melanie at Melanie@saigoled.com if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used

	and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consents	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

If you would like to exercise any of those rights, please:

- Email: Melanie at Melanie@saigoled.com
- provide enough information to identify yourself and any additional identity information we may reasonably request from you; and
- let us know what right you want to exercise and the information to which your request relates.

How to contact us

Please contact us if you have any queries or concerns about our use of your personal data. We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner, who may be contacted using the details at https://ico.org.uk/make-a-complaint or by telephone: 0303 123 1113.