

Mock Transfer Tests

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General Data Protection Regulation Privacy Policy



*When a helping hand
is all you need.*

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Document Location

This document is only valid on the day it was printed.

The source of the document will be found in the footer information

Revision History

Revision date	Previous revision date	Summary of Changes
May 2018	None	New policy to comply with legal obligation
1 st Feb 2019	May 2018	New format, consistent look and feel
28 th Jan 2020	1 st Feb 2019	No changes made
23 rd Jan 2021	28 th Jan 2020	Added Date Of Birth (DOB) to customer information.
1 st Feb 2022	23 rd Jan 2021	Reviewed, no updates.
19 th Jan 2023	1 st Feb 2022	3.0 f. added Quickbooks/ Xero. 4.1 added to cover photographs
10 th Jan 2024	19 th Jan 2023	Defined Customers (parents, carers, 3 rd parties, You) 9.0 clarified sharing info.
10 th Jan 2025	10 th Jan 2024	Reviewed, no changes required,

Approvals

This document requires the following approvals.

Signed approval forms are filed in the Management section of the project files.

Name	Title	Organisation	Date of Issue	Version
Andrew Filer	Operations Manager	Mock Transfer Tests	10 th Jan 2025	v.7
Gill Filer	Senior Tutor	Mock Transfer Tests	10 th Jan 2025	v.7

Distribution

This document has been distributed to

Name	Title	Organisation	Date of Issue	Version
Andrew Filer	Operations Manager	Mock Transfer Tests	12 th Jan 2025	v.7
Gill Filer	Senior Tutor	Mock Transfer Tests	12 th Jan 2025	v.7
Website	Website	Mock Transfer Tests	12 th Jan 2025	v.7
MTT Associates	Tutors / Tutor Assistances	Associates	12 th Jan 2025	v.7
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1.0 Introduction

This website is operated by Mock Transfer Tests (MTT, “we”, “our”, “us”), where MTT is the controller for the purposes of the Data Protection Act 2018. This means that MTT are responsible for, and control the processing of, the personal information parents / carers (Customers, “parents”, “carers”, “3rd parties” “you” “your” provide when using MTT services in accordance with this privacy policy

MTT understands that Customers care about the use and storage of their personal information and MTT value their trust in allowing MTT to do this in a careful and sensible manner. MTT have created this privacy policy statement in order to demonstrate our commitment to the privacy to its customers.

By using MTT services, you are acknowledging that MTT are processing Your personal information and, where necessary consenting to such practices, as outlined in this statement.

2.0 Personal information which we collect

MTT collect personal information about Customers and others if their personal information is provided when You:

- (a) register or alter details for a MTT account;
- (b) make or manage a booking;
- (c) sign up for MTT newsletters and other marketing emails (in line with **Marketing** below);
- (d) post material to the MTT website and / or social media page;
- (e) complete Customer feedback or surveys as part of using MTT services;

The personal information collected in the above manner may include the following about You (and others if their personal information is provided by You):

- (a) parents full name (first and surname);
- (b) postal address including postcode;
- (c) email address;
- (d) mobile telephone number;
- (e) child (students) full name;
- (f) school where the child attends;
- (g) supplementary information (health or special requirement)
- (h) date of birth (DOB) for the purposes of aged, related standardisation (where used)

3.0 How MTT use Customer information

MTT will collect personal information:

- 1) In order to take the necessary steps in preparation of, or to fulfil our obligations under, a booking contract: (booking may be a single event, course or supply of support material) and in accordance with the MTT Safeguarding Policy.

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- a) **Bookings and payments** – provide communications about bookings, products and services being provided to you (and others if their personal information is provided by you);
 - b) **Bookings and account updates** – send details of new, amended or cancelled bookings or account details, invoices and changes – usually via email;
 - c) **Update you on matters affecting your booking** – contact you (and others if their personal information is provided by you) in the event of a change that affects a booking or any data or personal information you have provided us with, such as changes to terms and conditions of booking or this privacy policy;
 - d) **Website service communication** – provide notifications of any changes to our website, social media pages, or to our services that may affect you (and others if their personal information is provided by you);
 - e) **To provide assistance in completing bookings** – send reminder emails to continue with a booking which is in your “basket” on our websites or mobile app but is not paid and completed; (such as joining instructions, etc)
 - f) **Account set up & invoicing** – information required to set up an account within the finance system (QuickBooks/ Xero), issue invoices, set up direct debits, manage your account.
- 2) with your consent:
- a) **Marketing communications** – create a profile about you for marketing purposes to tailor our communications to you.
 - b) **Newsletters** – inform you about forthcoming events, key dates, information and other products or services that may be of interest (in line with Marketing communications above);
 - c) **Maintain records indicating your consent to status** – to ensure we accurately reflect your wishes when communicating to you;
- 3) in our legitimate interest* improve our services:
- a) **Market research** – to contact you (and others if their personal information is provided by you) to ask about the experience using our services as part of a continual programme of customer service improvement. This is not marketing communication and is separate to Marketing communications above.
 - b) **Website customisation** – to customise our website and its content to your particular preferences in accordance with the Cookies and Tracking section below;
 - c) **Product and service improvement** – to improve our product and services;
- 4) in our legitimate interest* to protect against fraud:
- a) **Website improvement and fraud prevention** – improve our websites, prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf;

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- b) **Security** – carry out security checks when allowing you access to our services and to block fraudulent or suspected fraudulent activity.
- 5) in order to meet our legal obligations:
- a) **Taxation** – ensure we meet our tax and other regulatory obligations;
 - b) **Registration** – ensure local jurisdiction regulations are complied with (where registration is necessary in such jurisdictions).

* any reliance on legitimate interest shall not prejudice your interest or fundamental rights and freedoms.

4.0 Marketing

MTT may periodically send Newsletters to you about forthcoming events, support material, or other information which we think you may find interesting based on the profile we have created about you to the email addresses and phone numbers which you have provided.

Please note that MTT do not want to send you information that you do not want to receive and you can opt out at any time (please see 'The right to ask us to stop contacting you with direct marketing' below for further information).

MTT will always ask your permission before sending you email marketing information. MTT do this by asking for your positive confirmation (e.g. by providing a tick or inserting your contact details in the relevant boxes) indicating that you wish to receive marketing and you can opt out at any time (please see 'The right to ask us to stop contacting you with direct marketing' below for further information). This ensures you only receive information that you have given us permission to send and are willing to receive.

From time to time, MTT may also use your information to contact you for research purposes and / or to ask about your experience using our services as part of a continual programme of customer service improvement. MTT may contact you by email, telephone, text, social media and / or mail. We may also use the information to customise the website according to your interests.

4.1 Photographs

MTT may from time to time, wish to take photographs at classes, or events (mock tests). MTT will gain permission from you prior to taking any pictures either by email, on the booking form, or at registration at an event.

Images will only be used to promote MTT, they may appear on social media, websites, leaflets or other marketing / promotional material.

Where you decline / do not give permission, MTT will ensure any images do not include you or your child or are pixelated.

Images will be retained for the above purposes, if you at any time wish to rescind your permission, this should be in writing. Images will not be shared with any other organisation or 3rd parties.

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5.0 How long we will keep your personal information

MTT retain your information for a range of purposes which determine the period of time for which we need to keep such information. For example (list is not exclusive):

Data	Retention Period
For the purposes of marketing	3 years from the point of last contact with you, this may include use of our websites, services we provided or responses to communications with you
For compliance with legal obligations arising from contracts entered into with you, for example tax regulations	For compliance with legal obligations arising from contracts entered into with you, for example tax regulations

MTT will remove your data from our systems at the end of the applicable data retention periods, unless we are required by current or future law to retain your personal information for a longer period.

6.0 Our approach to information security

To protect your information, MTT has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. To achieve this, employees, associates, sub-contractors have defined roles and responsibilities, and training is provided to ensure compliance to this policy.

Personal information shall be secured and kept safe at all times. MTT will only share parent contact details to MTT team members, associates, sub-contractors for the purposes of registration, and providing follow up correspondence after classes or MTT events.

This information (register) shall be shared with the applicable school office, to advise and inform the school which pupils will be staying after school hours for classes.

While MTT take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to warranty the absolute security of your data when using our services.

7.0 Your rights

In order to process any of the requests listed below, MTT may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

[The right to access information we hold about you](#)

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request, we will respond within 30 days.

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The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us, and we will ensure that it is updated.

The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

The right to object to processing of your data

You have the right to request that MTT stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing. On Newsletter emails we provide an 'unsubscribe' link at the bottom of the email which will unsubscribe you from that service. If you wish to opt out with respect to more than one email address, you must complete a separate request for each email address.

Please note it is not possible to 'opt-out' of receiving communication from us which relates to your bookings or customer satisfaction surveys sent as part of the booking (which are not considered marketing for these purposes).

The right to complain

You can make a complaint to us by contacting us via enquiries@mocktransfertests.co.uk See our Complaints policy for more information.

8.0 Consent

In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form or web page requiring consent). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy.

9.0 Sharing your information

The information and data we collect is important for MTT and we understand that you care about the use and storage of your personal information we value your trust in allowing us to do this. We would not want to share this with anyone else unless we have your express consent, we will never disclose, rent, trade or sell your personal information to any third parties for their marketing purposes.

We do not disclose or transfer your data or personal information to other companies, data processors or agents employed by us to perform any necessary functions on our behalf (such as hosting and maintaining our website, providing us with data management systems, market research, customer

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satisfaction surveys and support services), but they are bound by similar terms to those set out in our privacy policy and may not use this information for their own purposes.

In the event that MTT or any part of its business is sold to or integrated with another business, MTT may disclose your personal information to the new owners (and their professional advisers on the transaction) to be used by the new owners and their group of companies in the same ways as set out in this privacy policy, including to continue providing you with the same services and marketing information services as are currently provided by MTT.

MTT will not share information held on you or others (if you have provided such information, eg a student, or students results) unless you provide written instructions that this information can be shared. (To clarify, MTT will ONLY provide information, progress reports, results or similar information to the person contractually engaged and recorded with MTT.)

10. Use of cookies

The MTT website uses cookies and tags. A cookie is a small text file that can be stored by your browser on the device you use to access internet and allows the browser to pass small amounts of information about user behaviour on the given website to a web server. Tags are pieces of code that exist on web pages and collect information about usage of the web pages.

At MTT we use our own cookies and tags as well as those from third parties to enable the smooth operation of the websites, such as the use of the basket function or to automatically log you in when you visit (with your permission). We also use cookies/tags to monitor visits to our website and continuously look for places to improve your website experience. Our marketing partners also use cookies and tags to monitor the performance of our advertising and to serve appropriate MTT advertisements to you on other websites. We will never share any personal information about you with these third parties and the cookies and tags used maintain your anonymity.

11. Cookie Consent

The first time you access the MTT website, you will be informed about our use of cookies to improve your site experience. By continuing to browse our website you consent to our use of cookies.

Description of cookies

Cookie Type	Example	Details
Analytics	Google Analytics	These cookies give us critical information about various pages on the websites and how our users interact with them. We use this information to improve the performance of our website and the information presented to users

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12. How to reject and delete cookies

Should you wish to reject or block the use of cookies, you can do so at any time, usually by clicking 'Help' on your browser. Cookies are specific to individual browsers so if you use more than one browser, you will need to delete cookies on each browser. Please be aware though that by rejecting cookies you may not receive the optimum website experience.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

13. Contact details

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact us.

Data Protection Officer

Andrew Filer
Mock Transfer Tests
11 Wilcot Ave,
Oxhey, Watford,
Herts, WD19 4AT

enquiries@mocktransfertests.co.uk

14. Changes to this Privacy Policy

MTT may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.

Any changes will be noted in the Revision History at the beginning of this policy.