

UK GDPR STATEMENT

Summary

This GDPR statement outlines the policies and procedures of Tide Education Limited concerning the processing of personal data and special category data in compliance with the UK General Data Protection Regulation (UK GDPR). The key points covered in this statement include:

- **Data Controller and Data Processor Roles:** Tide Education Limited acts as a Data Processor on behalf of educational institutions and other clients for the MIS data shared via Wonde. For data created and/or entered using Tide Education Limited platforms, the company is the Data Controller.
- **Types of Data Collected:** Various types of data are collected, including attendance data, behaviour data, detention data, employee data, suspension & exclusions data, special education needs (SEN) data, siblings data, and student data. All but the essential data is optional; see below for details.
- **Data Transfers:** All data is stored and processed in the UK or EEA, specifically using Amazon Web Services in London. No data is transferred out of the UK or EEA.
- **Data Retention:** Personal data is retained for six months after a contract has expired, after which it is permanently deleted. Data Controllers can request earlier deletion in writing.
- **Purpose of Processing the Data:** The data is processed primarily to fulfil contractual obligations and to enable third parties to fulfil their legal obligations as set out by the Department of Education.
- **Lawful Basis for Processing:** The company processes personal data based on lawful bases such as contract, legal obligation, and legitimate interests. For special category data, processing is conducted based on explicit consent.
- **Data Anonymisation:** The company may anonymise personal data to improve services, ensuring that the data can no longer be attributed to a specific data subject.
- **Data Subject Rights:** Data subjects have rights including access, rectification, erasure, restriction of processing, data portability, and the right to object.
- **Data Protection by Design and Default Security Measures:** The company implements appropriate technical and organisational measures to ensure data

security, including encryption, regular security assessments, access controls, and staff training.

Introduction

This GDPR statement outlines the policies and procedures of Tide Education Limited ("the Company") concerning the processing of personal data and special category data in compliance with the UK General Data Protection Regulation (UK GDPR). Tide Education is committed to ensuring the privacy and protection of personal data collected, processed, and stored in the course of its educational technology services.

Data Controller and Data Processor Roles

Tide Education Limited acts as a Data Processor on behalf of educational institutions and other clients ("data controllers") for the MIS data (Personal Data) shared via Wonde. This means that the Company processes the personal data under the instructions and authority of the Data Controllers, who determine the purposes and means of the processing.

For data that is created and/or entered using the Tide Education Limited platforms (mobile applications, desktop applications)), such as Intervention Schemas, Tide Education Limited is the Data Controller.

Data that is entered via the Tide Education Limited Website or trading names thereof; Tide Education Limited is the Data Controller

For Data that is anonymised, Tide Education is the Data Controller.

Types of MIS Data Collected via Wonde

The data collected by Tide Education Limited for which we are the Data Processor includes:

Attendance Data: Attendance records, summaries, and specific codes/details (optional).

Behaviour Data: Incident details, bullying types, points, comments, dates, and statuses (optional).

Detention Data: Types, schedules, employee associations, room details, and frequencies (optional).

Employee Data: Personal details, contact information, employment records, and identifiers.

Suspension & Exclusions Data: Academic year, reasons, committee outcomes, sessions, dates, and related comments (optional).

Special Education Needs (SEN) Data: Categories, descriptions, dates, ranks, and types (optional).

Siblings Data: Names, date of birth, and relationships to students.

Student Data:

Demographics: Name, birth date, legal names, and identifiers.

Education: Admission details, unique identifiers, UPN, current NC year, and leaver data.

Care & Protection: Child in need, protection plans, care history, and custody details (optional).

Additional Details: Premium pupil eligibility, FSM, gifted status, and paramedical support (optional).

Sensitive Indicators: Youth support services, permissions, and photographs (optional).

All data is collected via Wonde, where Data Controllers can control the optional data fields to be processed. All Special Category Data fields in Wonde are Optional; although doing so may limit the functionality and service(s) provided by Tide Education.

Data Transfers

All data is stored and processed in the UK or EEA. More specifically we use Amazon Web Services; eu-west-2 London. No data is transferred out of the UK or EEA.

Data Retention

Personal Data (that which is shared with Tide Education Limited and for which we are the Data Processor) is retained for 6 months after a contract has expired by default, after which it is permanently deleted. Data Controllers can request that their data is deleted before the conclusion of the 6 month period but must do this in writing and allow up to 2 months for the data to be deleted. The Data Controller will be notified when their data has been deleted.

Purpose of Processing the Data

The data is processed primarily to fulfil the obligations of a contract. To provide services to a Third Party and to enable them to fulfil their legal obligations as set out by the Department of Education. This includes both the data for which Tide Education Limited is both the Data Processor and Data Controller.

Lawful Basis for Processing

The Company processes personal data based on the following lawful bases under UK GDPR:

Article 6(1)(b) Contract: Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.

Article 6(1)(c) Legal Obligation: Processing is necessary for compliance with a legal obligation to which the data controller is subject.

Article 6(1)(f) Legitimate Interests: Processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

For special category data, processing is conducted based on:

Article 9(2)(a) Explicit Consent: The data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

Data Anonymisation

The Company may anonymise personal data to improve the services provided. Anonymisation ensures that the data can no longer be attributed to a specific data subject. This process aligns with the principles of data minimisation and purpose limitation as outlined in Article 5 of the UK GDPR. For data that is anonymised Tide Education Limited is the Data Controller.

Data Subject Rights

Data subjects have the following rights under the UK GDPR:

Right to Access: Obtain access to their personal data.

Right to Rectification: Request correction of inaccurate or incomplete data.

Right to Erasure: Request deletion of their personal data in certain circumstances.

Right to Restrict Processing: Request the restriction of processing under certain conditions.

Right to Data Portability: Receive their personal data in a structured, commonly used, and machine-readable format.

Right to Object: Object to the processing of their personal data in certain circumstances.

Right to Audit: Tide Education will support the Data Controller with their right to audit how their data is being processed.

Data subjects should contact their Data Controller who should in turn contact the Data Processor in writing detailing the request.

Data Protection by Design and Default Security Measures

The Company implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- Data encryption and anonymisation.
- Regular security assessments and audits.
- Access controls and authentication protocols.
- Staff training on data protection principles and practices.
- Staff confidentiality agreements.

However, no electronic transmission of data over the internet, or information storage technology is 100% secure, so we cannot guarantee protection from hackers, cyber criminals and such actors.

Should there be a data breach of Personal Data for which Tide Education is the Data Processor, then we will contact the Data Controller(s) at the earliest opportunity and support them in their investigation(s).

Contact Information

Tide Education Ltd is Registered with the ICO: C1647110.

For any questions or concerns regarding this GDPR statement or data protection practices, please contact:

Data Protection Officer

Tide Education Limited

71-75 Shelton Street,

Covent Garden,

London,

United Kingdom,

WC2H 9JQ

hello@tide.education

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to this Statement

This GDPR statement may be updated periodically to reflect changes in data protection laws or the Company's practices. Any updates will be communicated to data controllers and, where necessary, to data subjects.

Conclusion

Tide Education Limited is dedicated to protecting the privacy and rights of data subjects while providing high-quality educational technology services. By adhering to the UK GDPR requirements, the Company ensures that personal data is processed lawfully, fairly, and transparently processed.