

Mira Tutoring

Privacy Policy 2026/27

Effective from: 1 September 2026

Last reviewed: August 2026



Mira Tutoring is committed to protecting the privacy and personal information of students, parents, guardians and other people who use its services.

This Privacy Policy explains:

- what personal information Mira Tutoring collects;
- why it is collected;
- how it is used;
- who it may be shared with;
- how long it is kept;
- how it is protected; and
- the rights individuals have in relation to their information.

1. Who Is Responsible for Your Information?

For data-protection purposes, the data controller is:

Begum Ortucu trading as Mira Tutoring

Email: info@miratutoring.co.uk

Telephone/WhatsApp: +44 7523 933497

References in this policy to **Mira Tutoring, I, we, us** or **our** relate to Mira Tutoring as appropriate.

2. Who This Policy Applies To

This policy applies to personal information relating to:

- students;
- prospective students;
- parents and guardians;
- adult learners;
- website visitors;
- people making enquiries;
- people booking courses, workshops or tuition;

- former clients; and
- other people who communicate with Mira Tutoring in connection with its services.

It applies to information collected through:

- tutoring enquiries;
 - registration and booking forms;
 - regular tuition;
 - assessments and progress records;
 - email;
 - telephone;
 - text messages;
 - WhatsApp;
 - online tutoring platforms;
 - payment systems;
 - the Mira Tutoring website; and
 - other legitimate business communications.
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3. Personal Information We May Collect

The information collected depends on the services being provided.

Parent or guardian information

This may include:

- name;
- email address;
- telephone number;
- billing information;
- correspondence;
- booking information; and
- other information reasonably necessary to manage tuition.

Student information

This may include:

- name;
- age;
- date of birth where necessary;
- school year group;
- school attended;
- subjects studied;
- examination board;
- academic targets;
- predicted or previous grades;

- assessment results;
- lesson attendance;
- lesson notes;
- homework;
- educational strengths and areas for development;
- learning objectives;
- progress information; and
- work submitted for marking or feedback.

Additional educational, health or support information

Where relevant to providing appropriate tuition, a parent, guardian or student may voluntarily provide information concerning:

- special educational needs or disabilities;
- learning difficulties;
- access arrangements;
- medical information;
- allergies;
- mental or physical health information; or
- other circumstances affecting tuition.

Mira Tutoring will only seek information of this nature where it is relevant and proportionate to the student's tuition, welfare or safety.

4. Payment and Financial Information

Mira Tutoring may process information relating to:

- invoices;
- fees;
- payments received;
- outstanding balances;
- refunds or credits; and
- transaction references.

Where payments are processed using a third-party payment provider, full payment-card details may be processed by that provider rather than being held directly by Mira Tutoring.

Financial records may also need to be retained to meet accounting and tax requirements.

5. Website and Technical Information

When somebody visits the Mira Tutoring website, certain technical information may be collected automatically.

Depending on the website configuration, this may include:

- IP address;
- browser type;
- device type;
- operating system;
- pages visited;
- dates and times of visits;
- referral information; and
- information collected through cookies or similar technologies.

This information may be used to:

- operate and secure the website;
 - understand how the website is used;
 - diagnose technical problems; and
 - improve Mira Tutoring's services and marketing.
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6. Where We Obtain Personal Information

Most personal information is provided directly by:

- a parent or guardian;
- the student;
- an adult learner; or
- somebody making an enquiry.

Information may also be obtained:

- through the Mira Tutoring website;
 - through a booking or tuition-management system;
 - from assessment or tutoring activities;
 - from a school or educational professional where the parent, guardian or student has authorised appropriate communication; or
 - from another legitimate source where permitted by law.
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How Personal Information Is Used

7. Providing Tuition

Personal information may be used to:

- respond to enquiries;
 - assess a student's educational needs;
 - arrange lessons;
 - deliver tuition;
 - plan lessons;
 - prepare appropriate teaching resources;
 - monitor academic progress;
 - mark and provide feedback on work;
 - provide assessments;
 - communicate progress;
 - recommend areas for further study;
 - manage bookings;
 - communicate changes to lessons; and
 - provide other services requested by the client.
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8. Administration and Business Management

Personal information may also be used to:

- manage invoices and payments;
 - maintain appropriate business records;
 - deal with cancellations and rescheduling;
 - manage waiting lists;
 - respond to questions and complaints;
 - maintain the security of Mira Tutoring's services;
 - establish, exercise or defend legal claims;
 - comply with legal and regulatory requirements; and
 - maintain appropriate safeguarding records.
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9. Safeguarding

Information may be processed or shared where this is necessary to safeguard a child or another person.

Depending on the circumstances, relevant information may be shared with:

- Children's Social Care;

- a Multi-Agency Safeguarding Hub;
- a Local Authority Designated Officer;
- the police;
- a school or educational setting;
- healthcare or safeguarding professionals; or
- another relevant authority.

Safeguarding information will only be shared where there is an appropriate basis for doing so and the information shared will be limited to what is reasonably necessary.

Lawful Bases

10. Our Lawful Bases for Using Personal Information

Mira Tutoring will only use personal information where there is an appropriate lawful basis.

Depending on the information and purpose, these may include:

Contract

Information may be processed where this is necessary to:

- take steps before entering into a tutoring agreement; or
- provide and administer tuition under an agreement with a parent, guardian or adult student.

Legitimate interests

Mira Tutoring may rely on legitimate interests where the information is reasonably necessary to operate and improve the tutoring service and those interests are not overridden by the individual's rights and freedoms.

Examples may include:

- administering tuition;
- keeping appropriate educational records;
- communicating with parents;
- managing the business;
- protecting the security of systems; and
- dealing with complaints or disputes.

Particular care will be taken where the personal information belongs to a child.

Legal obligation

Personal information may be processed where this is necessary to comply with a legal requirement.

Vital interests

In exceptional circumstances, information may be processed where it is necessary to protect someone's life or physical safety.

Recognised legitimate interests or other safeguarding bases

Where permitted by applicable data-protection legislation, an appropriate safeguarding-related lawful basis may be used to protect children or other vulnerable individuals.

Consent

Consent may be used where this is the appropriate legal basis, particularly for optional activities such as certain marketing or publicity uses.

Where processing is based on consent, consent may be withdrawn.

11. Special Category Information

Some information requires additional protection under data-protection law.

This can include information concerning:

- health;
- certain disabilities or medical conditions;
- ethnicity;
- religion;
- or other categories of sensitive personal information.

Where special-category information is processed, Mira Tutoring will identify both:

1. an appropriate lawful basis for using the information; and
2. an appropriate condition permitting the processing of special-category information.

Where health, SEND or similar information is voluntarily provided specifically so that tuition can be adapted to the student's needs, Mira Tutoring may rely on explicit consent where appropriate.

Different legal conditions may apply where information must be processed for safeguarding, legal or emergency reasons.

Only information genuinely relevant to the purpose will be retained.

Sharing Information

12. Service Providers

Mira Tutoring may use trusted third-party providers to help deliver or administer its services.

These may include providers of:

- tuition-management systems;
- booking systems;
- payment processing;
- email and communications;
- video conferencing;
- cloud storage;
- website hosting;
- accounting software;
- online educational tools; and
- other necessary business technology.

These providers may process personal information only to the extent necessary for the relevant service and will be expected to handle information appropriately.

13. Schools and Educational Professionals

Where it is helpful to support a student's education, Mira Tutoring may communicate with:

- teachers;
- schools;
- SEND or pastoral staff;
- educational professionals; or
- other tutors.

This will normally happen with the knowledge or agreement of the parent, guardian or adult student unless another lawful reason requires information to be shared.

14. Other Circumstances in Which Information May Be Shared

Personal information may also be shared where reasonably necessary with:

- safeguarding authorities;
- the police;
- courts or other legal authorities;

- HM Revenue & Customs;
- accountants or professional advisers;
- insurers; or
- other organisations where disclosure is required or permitted by law.

Mira Tutoring **does not sell personal information** to other organisations.

Marketing and Photographs

15. Marketing Communications

Mira Tutoring may occasionally contact parents or adult clients about relevant tuition services, groups, courses, workshops or similar services.

Marketing by email, text or other electronic message will only be sent where there is an appropriate legal basis for doing so.

Where required, consent will be obtained.

Where applicable law allows marketing to existing customers without separate consent, an appropriate opportunity to opt out will be provided.

Individuals may opt out of marketing communications at any time.

Administrative communications about an existing booking or tuition arrangement are not marketing messages.

16. Photographs and Videos

Mira Tutoring will not treat acceptance of its general Terms and Conditions as automatic permission to use an identifiable child's image for marketing.

Separate permission will be requested before identifiable photographs or videos of a child are used for purposes such as:

- social media;
- the Mira Tutoring website;
- advertising;
- promotional materials; or
- other public marketing.

Consent may be withdrawn for future use.

Withdrawal cannot necessarily remove material that has already been lawfully printed or distributed, but reasonable steps will be taken regarding future publication and digital content under Mira Tutoring's control.

Educational photographs, screenshots or images of work may be processed separately where necessary for tuition, assessment, record keeping or communication with parents.

Cookies and Online Services

17. Cookies

The Mira Tutoring website may use cookies or similar technologies.

Some cookies may be necessary for the website to function.

Where non-essential analytics, advertising or similar cookies are used, they will be managed in accordance with applicable cookie and consent requirements.

Website visitors should be given appropriate choices concerning non-essential cookies.

18. Links to Other Websites

The Mira Tutoring website or teaching materials may contain links to websites operated by other organisations.

Mira Tutoring is not responsible for how another organisation processes personal information on its own website.

Users should review the privacy information provided by the relevant third party where appropriate.

Keeping Information

19. How Long Information Is Kept

Mira Tutoring will not retain identifiable personal information for longer than is reasonably necessary for the purpose for which it is held.

As a general approach:

Enquiries

Information from an enquiry that does not become a tutoring relationship will normally be deleted when it is no longer reasonably required, generally within **12 months of the last meaningful contact**, unless there is a legitimate reason to retain it longer.

Active tuition records

Information needed to provide tuition will normally be retained for the duration of the tutoring relationship.

Routine educational and administrative records may be retained for a reasonable period after tuition ends where necessary for:

- continuity;
- responding to later queries;
- complaints;
- legal claims; or
- legitimate business record keeping.

Routine records that are no longer required will be securely deleted or anonymised.

Financial and accounting records

Invoices, payment records and other records needed for tax or accounting purposes will be kept for at least the period required by HM Revenue & Customs.

Safeguarding records

Safeguarding records may need to be retained for longer than routine lesson information.

Their retention will be determined according to the nature of the concern, safeguarding requirements and any applicable legal or professional guidance.

Marketing information

Marketing contact information will be held while the person continues to receive marketing or until it is no longer required.

Where someone opts out, limited information may be retained on a suppression list so that their preference can continue to be respected.

Marketing photographs or videos

Marketing images will be periodically reviewed and will not be retained indefinitely simply because consent was originally obtained.

International Processing

20. Information Processed Outside the UK

Some technology providers used by Mira Tutoring may store or process information outside the United Kingdom.

Where personal information is transferred internationally, Mira Tutoring will take reasonable steps to ensure that the transfer is made using an appropriate safeguard or other lawful mechanism required by UK data-protection law.

Security

21. Protecting Personal Information

Mira Tutoring takes reasonable technical and organisational steps to protect personal information.

These may include:

- password-protected devices and accounts;
- appropriate access controls;
- keeping software reasonably up to date;
- secure cloud or online services;
- limiting access to personal information;
- secure disposal of information when no longer required; and
- additional care with safeguarding and special-category information.

No electronic system can be guaranteed to be completely secure, but reasonable steps will be taken to reduce foreseeable risks.

Your Rights

22. Data Protection Rights

Depending on the circumstances and lawful basis used, individuals may have rights including:

- the right to be informed about how information is used;
- the right to access personal information;
- the right to request correction of inaccurate information;

- the right to request deletion of information in certain circumstances;
- the right to request restriction of processing;
- the right to object to certain processing;
- the right to data portability where applicable;
- the right to withdraw consent where consent is being relied upon; and
- rights relating to automated decision-making where applicable.

These rights are not absolute and some exemptions may apply.

Requests should be sent to:

info@miratutoring.co.uk

Mira Tutoring may need to verify the identity of the person making the request before disclosing personal information.

23. Children's Rights

Children have data-protection rights in relation to their own personal information.

Where appropriate, information about privacy and data use will be explained in language suitable for the student's age and understanding.

Depending on a child's age, understanding and the circumstances, a child may be able to exercise their own data-protection rights.

Parents and guardians may also exercise rights on behalf of their child where appropriate.

The child's interests and privacy will be considered when deciding how a request should be handled.

24. Automated Decision-Making

Mira Tutoring does not ordinarily make decisions about students solely through automated processing where the decision would have a legal or similarly significant effect on them.

Educational assessments and professional judgements about tuition are made with human involvement.

Concerns and Complaints

25. Data Protection Complaints

If you are concerned about how Mira Tutoring has collected, used, stored, shared or otherwise handled personal information, please contact:

Begum Ortucu

Email: info@miratutoring.co.uk

Mira Tutoring will provide an accessible way for individuals to raise data-protection complaints.

A data-protection complaint will:

- be acknowledged within **30 days**;
- be considered appropriately;
- be investigated where necessary; and
- receive a response explaining the outcome without undue delay.

Where a complaint cannot be resolved directly, individuals also have the right to complain to the **Information Commissioner's Office (ICO)**.

26. Data Breaches

Where Mira Tutoring becomes aware of a personal-data breach, appropriate steps will be taken to:

- contain and assess the incident;
 - reduce potential harm;
 - document the breach;
 - notify affected individuals where legally required; and
 - notify the Information Commissioner's Office where legally required.
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27. Changes to This Privacy Policy

This Privacy Policy may be updated where:

- Mira Tutoring's services change;
- technology or service providers change;
- data-processing activities change; or
- legal or regulatory requirements change.

Where a change is significant, reasonable steps will be taken to bring the updated policy to the attention of affected clients.

The latest version will be made available through Mira Tutoring's usual communication channels or website.

28. Contact

For questions, requests or complaints concerning personal information:

Mira Tutoring

Begum Ortucu trading as Mira Tutoring

Email: info@miratutoring.co.uk

Telephone/WhatsApp: +44 7523 933497

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