

PRIVACY AND COOKIES POLICY

Welcome to Sterling Study's Privacy and Cookies Policy (**Policy**).

We respect your privacy and is committed to protecting your personal data. This Policy will inform you as to how we look after your personal data when you visit and use our Platform (defined below) and tell you about your privacy rights and how the law protects you. References to "we", "us", or "our" in this Policy mean Sterling Study.

We ask that you read this Policy carefully.

This Policy is divided into the following sections:

Section 1: Privacy Policy

- Who we are, purpose of this privacy policy, and our processing role
- Contact details:
- Our collection and use of your personal data
- How we use your personal data and our lawful basis
- Transfers of your personal data out of the UK and EEA
- Mobile application
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- Your rights
- Keeping your personal data secure
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Section 2: Cookies Policy

SECTION 1: PRIVACY POLICY

Who we are, purpose of this Policy and our processing role:

Sterling Study operates a digital learning website and mobile application (hereafter, the **Platform**) where you can browse and purchase tutoring services on behalf of children. For more information see: <https://sterlingstudy.co.uk/about-us>

As such, we collect and use the personal data of three (3) categories of data subjects (**Data Subjects**):

1. Visitors to our Platform and those who enquire about the services offline;
2. Customers with accounts and guest accounts on the Platform; and
3. Students who receive our services.

We collect, use and are responsible for certain personal data about Data Subjects. When we do so we are regulated under the **UK GDPR** (consisting of the UK Data Protection Act 2018, as amended and updated in light of the UK's departure from the European Union) and the **EU GDPR** (the General Data Protection Regulation (EU) 2016/79, as amended from time to time), as applicable based on your location in the United Kingdom or the European Union and we are responsible as '**controller**' of that personal data for the purposes of those laws.

Throughout the Platform, we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you, or provide external services. These other third party websites may also gather information about Data Subjects in accordance with their



own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

Contact details:

If you have any questions about this Policy or our privacy or tracking practices, please contact us using the following details:

Full Name of Legal Entity: Sterling Study Ltd

Contact: www.sterlingstudy.co.uk

Postal Address: 88a George Lane, E18 1JJ, London, UK

You have the right to make a complaint at any time to your local supervisory authority. If you are based in the United Kingdom, then this will be the Information Commissioner's Office (the ICO), who is the UK regulator for data protection issues. For more information, please visit www.ico.org.uk.

If you are based in the European Union, please consult the following website to find out the details of your local supervisory authority, https://edpb.europa.eu/about-edpb/board/members_en.

We would, however, appreciate the chance to respond to your query and deal with your concerns before you approach a supervisory authority.

Our collection and use of Data Subjects' personal data:

We collect personal data about Data Subjects when they access our Platform or make enquiries about our services offline, including when you create an account with us, purchase services via our Platform, contact us, send us feedback, post material to our Platform and where students access the Platform for their homework.

We collect this personal data from Data Subjects either directly, such as when you create an account with us, contact us or sell or purchase products via our Platform or indirectly, such as your browsing activity while on our website (see Section 2 - Cookies Policy below for more information on the cookies we use).

The personal data we collect about Data Subjects depends on the particular activities carried out through our Platform.

If you create an account on the Platform to purchase services, we collect the following personal data:

- your name, billing and delivery address and contact details such as email address and telephone number;
- the name, date of birth and educational needs of the student;
- transaction data such as details of any payments you make to us via our nominated payment provider;
- details of any feedback you give us by phone, email, post or via social media;
- information about the services we provide to you and are interested in purchasing, or have purchased;
- your account details, such as username, login details;
- Data Subjects IP address, login data, browser type and version, operating system and platform, and device data; and
- usage data on how Data Subjects use our Platform, and services.

If Data Subjects merely visit the Platform, but do not have an account or have not purchased any services from us or use our services, we only collect the following personal data:

- IP address, login data, browser type and version, operating system and platform, and device data;
- usage data on how you use our Platform, and services; and
- preferences in receiving marketing from us.

We use this personal data to:

- create and manage your account with us;
- verify your identity;
- provide the Platform services and tutoring services to you and the student;
- offer and sell our services to you;
- customise our Platform and its content to you and students' particular preferences and requirements;
- notify you of any changes to our Platform or to our services that may affect you; and
- improve our services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from Data Subjects' personal data but is not considered personal data in law as this data will not directly or indirectly reveal the identity of Data Subjects. For example, we may aggregate Data Subjects' usage data to calculate the percentage of users accessing a specific Platform feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify Data Subjects, we treat the combined data as personal data which will be used in accordance with this Policy.

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

How we use Data Subjects' personal data and our lawful basis for processing your personal data

We will only use Data Subjects' personal data when the law allows us to. Most commonly, we will use Data Subjects' personal data in the following circumstances:

- If you are a customer who has purchased services from us, we will process the personal data of you and the student in order to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal obligation.

When we process Data Subjects' personal data, we are required to have a lawful basis for doing so. There are various different lawful bases on which we may rely, depending on what personal data we process and why.

Please see the below for more information on the lawful basis that we may rely on:

- **consent:** where Data Subjects or in the case of students, where the parents or guardian have given us clear consent for us to process personal data for a specific purpose
- **contract:** where our use of Data Subjects' personal data is necessary for a contract we have with that Data Subject, or because the Data Subject has asked us to take specific steps before entering into a contract
- **legal obligation:** where our use of a Data Subject's personal data is necessary for us to comply with the law (not including contractual obligations)
- **legitimate interests:** where our use of a Data Subject's personal data is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect a Data Subject's personal data which overrides our legitimate interests)

Further information—the personal data we collect, when and how we use it

For further details on when we collect personal data, the type of data we collect as well as the lawful basis we rely on, please read the following table:

Purpose for processing your personal data	Type of data	Lawful basis for processing including basis of legitimate interest
To create an account for a Data Subject on the Platform.	(a) Identity (b) Contact (c) Date of birth of student (d) Information about the education needs of the student including school of attendance	Performance of a contract with you
To process and deliver your services including: (a) Organising digital lessons; (b) Sending out homework; (c) Manage payments, fees and charges; and (d) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with Data Subjects which will include: (a) Notifying customers about changes to our Terms of Use or Privacy and Cookies Policy (b) Asking Data Subjects to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and the Platform (including troubleshooting, data	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context

analysis, testing, system maintenance, support, reporting and hosting of data)		of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Platform content and advertisements to Data Subjects and measure or understand the effectiveness of the advertising we serve to Data Subjects	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Platform, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Platform updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to Data Subjects about goods or services that may be of interest	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Who we share your personal data with

If you are a customer on the Platform, we share the personal data of customers such as identity, contact and transactional data with our payments services provider.

This data sharing enables us to ensure orders are fulfilled and services are performed accordingly. This also allows us to recover the sums for the services owed by you.

Transfer of your personal data out of the UK and EEA

We will not transfer the personal data of Data Subjects to jurisdictions located outside the United Kingdom (**UK**) or European Economic Area (**EEA**).

Mobile application

Our mobile app is suitable for under 18s:

- Our Platform and mobile application are suitable for users under the age of 18.
- Parents or guardians may create an account for their child and provide their consent for us to process their personal data by agreeing to our terms and conditions during the registration process.

We do not show any explicit or nudity content:

- Our Platform and mobile application do not contain any explicit or nudity content.
- We take steps to ensure that all content published on our Platform is appropriate for users of all ages.

In-App Advertising:

- Our mobile application may display advertisements from third-party advertisers.
- We take steps to ensure that all in-app advertisements displayed on our mobile application are appropriate for our users.
- We do not display any advertisements that contain any explicit or nudity content or any content that may be harmful or offensive to our users.
- If you click on an in-app advertisement on our mobile application, you will be directed to the advertiser's website, which is governed by their own privacy policy and terms and conditions. We do not have control over their practices and are not responsible for the content or privacy practices of those websites.

Marketing

We would like to send you information about the Platform, our services, the products on sale and any special offers, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.

We will ask whether you would like us to send you marketing messages when you provide consent to such marketing, or where you have purchased products from us.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:

—contacting us using the detail provided at the beginning of this Policy;

—using the 'unsubscribe' link in emails; or

—updating your marketing preferences on our Platform within your account.

Your rights

Under the UK GDPR and the EU GDPR, you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal data
- access to your personal data and to certain other supplementary information that this Policy is already designed to address
- require us to correct any mistakes in your personal data which we hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing

- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please email or write to us using the details provided at the beginning of this Policy.

We will require information from you to allow us to identify you. We will endeavour to respond to all requests with 30 days of receipt.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Changes to this Policy

This Policy was last updated on 17th May 2022.

We may change this Policy from time to time, when we do, we will update this Policy on the Platform. It is your responsibility to ensure you are always up to date of the latest policy in force.

SECTION 2: COOKIES POLICY

Please read this Cookies Policy carefully as it contains important information on how we use cookies on our Platform.

Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you visit and use our Platform. We use cookies on our Platform. These help us to recognise you and your device and store some information about your preferences or past actions.

For example, we may monitor how many times you visit the Platform, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.



This information helps us to grow our business and provide more tailored content for you. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

For further information on cookies generally, including how to control and manage them, visit the [guidance on cookies](#) published by the UK Information Commissioner's Office, www.aboutcookies.org or www.allaboutcookies.org.

Consent to use cookies and changing settings

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested (e.g. to enable you to put items in your shopping basket and use our check-out process).

You can withdraw any consent to the use of cookies or manage any other cookie preferences by using our privacy dashboard on the Platform.

Our use of cookies

The table below provides more information about the cookies we use and why:

The cookies we use	Name	Purpose	Whether cookie is essential for us to provide you with a service that you have requested and whether we will seek your consent before we place the cookie
HTTP	ci_session	Preserves user states across page requests.	Necessary- permission is not required.

How to turn off all cookies and consequences of doing so

If you do not want to accept any cookies, you may be able to change your browser settings so that cookies (including those which are essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our Platform.

For further information about cookies and how to disable them please go to the [guidance on cookies](#) published by the UK Information Commissioner's Office, www.aboutcookies.org or www.allaboutcookies.org.

How to contact us

Please contact us using the details provided at the beginning of this Policy if you have any questions about this cookie policy or the personal data we hold about you.