



Plytime Privacy Policy

[Privacy Policy | Plytime](#)

1. This Policy

This Policy explains our processing of your personal data and your rights according to EU General Data Protection Regulation and UK data protection legislation. We reserve the right to modify this Statement at any time without notice by posting the changes on this page.

For schools, where Plytime acts as a Data Processor, please see the Data Processing Agreement contained within the Terms and Conditions, which comes into effect when a school creates and account or subscribes a Class.

2. What Information is Collected?

a. Personal information you give us that is necessary for the use of the Plytime Site

Plytime processes personal data as a necessary part of entering into and performing our contract with you, which is governed by our Terms and Conditions. As part of the process of using the Site and the Services, we require you to give us certain Personal Information which we need to provide our Service. Without this information we may not be able to fulfil our contract with you. This information includes:

- **Account information:** to enable us to create an account for you on the Site. Depending on whether you register as a parent, student, tutor, school or teacher this information can include your name, email, telephone number, postal address, and date of birth.
- **Tutor application details:** so we can process your application to become a tutor. These details include your personal details, CV including educational background and qualifications, your tutoring subjects, your profile picture, details of any criminal convictions (including a DBS certificate or update service details), your availability & ideal hours and your gender. We also ask for information to demonstrate academic qualifications, that you have the right to work in the UK and bank details to be able to pay you for Focus 15™ and Spotlight sessions
- **Interest forms:** so that we can respond to enquiries from parents or schools and provide you with more information about our services we ask for names, email addresses and phone numbers
- **Tutor Sessions:** We record all online Focus 15™ and Spotlight sessions that take place through our platform for safety and monitoring purposes and to learn from the sessions in order to continually improve and make the process as effective as possible.
- **Communication history:** to enable communication between Tutors, Students, Parents, and sometimes Teachers, and the Plytime team we store details about your Messages and emails.
- **Booking and attendance history:** including information on booking requests to be able to match Students with appropriate Tutors, status of bookings, cancellations and absences together with data related to attendance of the sessions by both Students and Tutors.
- **Tutor capacity information:** to enable us to show tutors the most relevant opportunities and match customers with the most relevant tutors.
- **Performance Data Students:** we record all Plytime questions and answers undertaken by students to allow us to build performance charts and highlight areas of weakness

- **Performance Data Tutors:** as part of a Tutor's performance we record feedback from students, tutor activity in relation to attendance and flexibility and student's performance in order to recognise and reward the best tutors
- **Feedback Data:** we record details of the Plytime and Tutor feedback that is provided by Students (or their legal guardians) to enable us to improve the service and standard of tutoring
- **Promotions and Referrals:** we record details of promotion codes redeemed and referral information provided to be able to apply rewards to your account.
- **Chat Facility:** where the chat facility is in use, we use Tidio, a chat platform that connects users with the customer support of Plytime. If we collect email addresses/names/phone numbers through that platform it will only be done with the consent of the users, in order to start the chat. The messages and data exchanged are stored within the Tidio application. For more information, please refer to their Privacy Policy.
Plytime is not making use of these messages or data other than to follow up on users' registered issues or inquiries. Your personal data will be processed and transmitted in accordance with the General Data Protection Regulation (GDPR).
- **Advertising for Good:** in future we may from time to time target advertising to you based upon your details provided. The aim of Advertising For Good (AFG) is to reduce costs of tutoring as low as possible.
- **My Groups:** in future when My Groups are enabled on the platform we will record and maintain details of other users who you have asked to join your friend group

b. Information we automatically collect from use of the Plytime Site

We collect some information from all users of the Plytime site regardless of whether you are registered with us as a Student or Tutor, to fulfil our contract with users and to enable our legitimate interests in providing the Plytime site and services.

- **Automatically tracked information includes:** Cookie information, your IP address, details of the device you use to access the Site, the pages you visit and the actions taken, the times and dates of actions you take on our website, your interactions with our email, text and in-app messages, the source of your visit and/or previous webpage before visiting our Site, and your page response times.

c. Information we collect from third parties

- **Other sources:** we reserve the right, where permitted by law, to collect and use information on you from third party providers.

d. Financial information

We may require you to provide us with Financial Information to authorise or process payment and bill you or pay you for the Services. These details include for tutors your nominated bank or payment account and for customers or schools your payment card or Stripe details.

When you subscribe for Plytime via the Site (if you are a Student or the legal guardian thereof) or when you receive payment for delivering Focus 15™ or Spotlight sessions via the Site (if you are a Tutor), we will pass your Financial or Personal Information to those third parties necessary to process your transactions with us, such as Stripe, credit card companies and banks. All payment card information is handled by a third party. We do not handle any payment card information ourselves, and are not PCI compliant

The legal basis under GDPR by which we are permitted to process this information in this way is that it is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you or where we need to comply with a legal obligation.

This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction. Except as provided above, we will not share Financial Information with third parties without your prior consent.

3. How is the Information Used?

The Site asks you to provide various types of Personal Information to enhance the quality of the Services we can provide to you and the more accurate the information you provide, the better we are able to respond to your requirements.

Any Personal Information that is held with Plytime shall be retained in accordance with the GDPR. Plytime is the data controller in respect of all of the Personal Information which Plytime collects and receives about you when you use the Plytime Services.

a. Data processing to provide and improve the Plytime Site and Services

We use your information primarily to fulfil our contract to provide you with the Services that you request, and related services (this includes providing this Site, website administration and security). We run the following processes to fulfil our contract with you:

- Enabling Schools, Teachers, Parents, Students and Tutors to access the Site and create accounts
- Enabling you to manage your Plytime account and receive updates from us as and when necessary
- Facilitating matching between Students and Tutors in order to find an appropriate Focus Tutoring day and time
- Enabling parents, tutors, students and teachers to communicate with each other through Messages
- Enabling flexible subscriptions that enable easy addition and removal of Focus Tutoring Sessions
- Enabling payments through a secure third party provider
- Enabling students to enter single and multi-player Play
- Enabling personalised content for each and every student
- Enabling detailed performance tracking in order to pinpoint areas that need additional focus
- Enabling schools to set up Classes
- Enabling teachers and Plytime Admin to set up Competitions
- Providing support for Students and Tutors
- Providing recordings of sessions for safeguarding

We also use your information to support our legitimate interests in developing the Site and the Services. These processes include:

- To aid the technical administration of the Site
- To ensure quality of service
- To better understand how the Site is functioning for Users to inform our product development
- To draw conclusions upon demographic information
- To improve the efficiency and effectiveness of the service and achieve our aim of reducing the cost of tutoring
- Preventing fraud, spam and abusive or inappropriate behaviour
- Fulfilling our safeguarding and legal obligations

You acknowledge that your Personal Information may be used by Plytime to contact you by post, phone or by electronic mail when necessary in connection with the Services requested by you on the Site.

b. Data processing to provide, tailor and improve our marketing activities

We also use your information to support our legitimate interests in marketing our Site and the Services. These processes include:

- Marketing activities to promote our services to registered and non-registered users. These communications may be personalised to you and your interactions with the Site and can be delivered by email, phone, social media advertising and other digital marketing channels
- Notifying you about upcoming promotions, Referral Discount Codes, services or customer surveys
- Undertaking impact reporting to understand the efficacy of our Services
- Undertaking research to better understand our customers interests
- Analysing your interactions to improve the efficiency of our marketing activities

c. Direct marketing

From time to time, Plytime may contact you by post, by telephone (which may be recorded for quality assurance purposes) or by electronic mail, with information or offers relating directly to the Site and the Services or from AFG partners with information or offers regarding their products and services

When you register on the Site, you accept that your contact information may be used by Plytime for direct marketing purposes relating directly to the Site and the Services.

Upon registration, you will immediately receive a welcome email which you cannot opt out of receiving, however, once this initial email has been received, you will be given an opportunity to unsubscribe i.e. opt-out of marketing e-mails thereafter.

Depending on your decision not to opt-out of receiving marketing communications from Plytime, Plytime may contact you by post, by telephone (which may be recorded for quality assurance purposes) or by electronic mail with information or offers regarding products (and services) such as discounts, exclusive offers or information.

Opting out: If you do not wish to be contacted by Plytime in respect of future marketing communications, please unsubscribe.

d. The legal grounds under GDPR for processing your personal data described above are as follows

- It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you, for us to provide you with our products and services. Where we require information from you for these purposes we have set out above which information it is necessary for us to process, without which we will be unable to provide you with our services.
- It is necessary for the purposes of our legitimate interests, such as fraud prevention, child protection, maintaining quality of service, error detection and cybersecurity, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you. In order to protect children from harassment and abuse, we video record and store tutoring sessions.
- You have given us explicit opt-in consent to the processing of your personal data for one or more specific purposes, namely where you have given us consent to receive electronic Direct Marketing by us and/or by third parties as described in this notice.
- Where we need to comply with a legal obligation; or in rare circumstances:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes

4. Who else has access to this information?

a. Other users on the Plytime site

Relevant Student Information may also be viewed by Tutors or by a Parent (or legal guardian thereof) or Tutor for the sole purposes of enabling Tutors to deliver their Tutoring Services and access to the Tutoring Services themselves.

If you as a Student make a request for Plytime Tutoring Services via the Site, your Personal Information will be shared with the Tutor to enable the Tutor to deliver the Focus Tutoring Session. Such details may include: first name, avatar, current school year, the subject and level of tutoring required, your performance information.

If you as a Tutor submit Personal Information on the Site for example by creating a profile, Personal Information in your profile may be accessible any Student who is matched with you for a Focus Tutoring Session. The personal information shared may include: first name and your profile picture. Releasing this Personal Data is necessary for you to make use of the Site and the Services.

If you as a user send a message to another user on the Site, you acknowledge that Plytime may monitor the content of your message to fulfil our safeguarding obligations and to protect our legitimate interests.

b. Third party companies and service providers

We use a variety of third party companies to provide the services and we may need to pass some Personal Information to these third parties. If we pass Personal Information to third parties, we minimise as far as possible what Personal Information is shared. The categories of third party providers we share personal data with include:

- Website developers
- Third party Server providers (e.g. video conferencing providers)
- Analytics providers
- Payment providers
- Communications platforms for email, text and in-app communications
- Marketing platforms
- Identity verification tools
- Surveys and research providers
- Accounting and finance platforms
- Customer support platforms

c. Disclosure of your personal information and financial information in compliance with laws

You should be aware that we may release your Personal Information or Financial Information when we believe it is necessary to comply with laws or regulations, to assist law enforcement, to enforce the terms under which you transacted with Plytime, or to protect the rights, property or safety of Plytime, Site Users or others.

d. Transfer of your personal information and financial information outside of the UK

User data, apart from tutors, will not be transferred outside the country in which the information is gathered.

We may transfer tutor data to entities outside of the UK if the tutor is engaged in activities in that country (e.g. you agree to provide tutoring services to students abroad). In all cases we will only

ever transfer the data required to deliver the services as required and or by law of that country. In the event that this leads to any variation to this policy you will be informed as soon as possible

e. Other sites/third party vendors and their privacy policies and cookie policies

This Site may contain links to other websites. Plytime is not responsible for the privacy practices or the content of such websites or for the privacy policies, cookie policies and practices of other third parties, and so you should be careful to read and understand those website policies independently.

5. How do we protect your information?

The privacy and protection of your Personal Information is important to us. You acknowledge that email messages sent over the internet are not encrypted and are not secure. Despite efforts to protect your Personal Information, we cannot ensure or warrant the security of any information you transmit to us, or to or from our online Services. You accept that Plytime cannot be held liable for any breaches of confidentiality that may occur as a result of the use of email. If there is any sensitive or confidential information which you do not wish to communicate by email, please contact Plytime by telephone or post to arrange an alternative method of communication. You transmit all such information at your own risk. However, once we receive your transmission, we use our best efforts to ensure its security on our systems.

The Site has security measures in place to protect the loss, misuse and alteration of the information under our control. We use 128-bit industry standard Secure Server Software (SSL) for your transactions with us. It encrypts all your Personal Information, including credit card number, name, and address, so that it cannot be read as the information travels over the Internet.

6. Cookies

For information about cookies and how they are used on this website, visit our [Cookie Policy](#)

7. Complaints or queries

Plytime tries to meet the highest standards when collecting and using Personal Information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This Statement does not provide exhaustive detail of all aspects of Plytime's collection and use of Personal Information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the UK data protection regulator, the Information Commissioner's Office. Further details can be found at ico.org.uk or 0303 123 1113.

8. How long do we keep your information for?

We will retain your personal data for different periods depending on the service you have chosen to use us for, which may be a longer period than that for which we need to hold your data to provide those services, i.e. where we are under regulatory or statutory duties to hold your data for a longer period. Data will be held by us for the period necessary to meet the purposes for which we initially collected the information.

- By default, we retain personal data for seven years after you have last been active on the Site. This is to allow you to continue to use your Plytime account for the duration of the average lifecycle of an Plytime user.
- After that period has passed, or after you request us to delete your data (whichever is earlier) we will delete your personal data except where we have specific reason which means we need to keep it for longer.

- Records that you have shared publicly or have shared with another user, for example reviews you leave, messages you send and bookings you make, may remain on the Site after your personal information has been deleted but will no longer have identifying information which links them to you associated with them.
- We may retain records where necessary to fulfil our regulatory or statutory duties.

9. Access to and rectification of personal information

Plytime tries to be as open as it can be in terms of giving people access to their Personal Information. Individuals can find out if we hold any Personal Information by making a “subject access request”, normally free of charge, under the data protection legislation. If we do hold information about you we will let you have a copy of that information unless a legal exception applies, in which case we will inform you of this at the time. You also have the right to request that information we hold about you which may be incorrect, incomplete, or which has been changed since you first told us, is updated or removed.

To make a request to exercise either of these rights, please either put the request in writing addressing it to the address provided below or email us your request to contact@plytime.com with the subject line “Subject Access Request”.

10. Moving your personal information

In the event that we process your data by automated means where you have either provided us with consent for us to use your information or where we used the information to perform a contract with you, you have the right to request that we send to you or to another organisation, an electronic copy of the personal data we hold about you in a structured, commonly used and machine-readable format, for example when you are dealing with a different service provider. If you would like us to provide you, move, copy, or transfer your information in this manner, please let us know by email to contact@plytime.com. We will respond to you within one month after assessing whether or not this is possible, taking into account the technical compatibility with the other organisation in question.

11. Deletion of your personal information

You can ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where you have withdrawn consent for us to process it (as explained below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

To request that we delete your personal data please send an email with the subject line “Personal data deletion” to contact@plytime.com

12. How can you withdraw consent to our processing your personal information

You have the right at any time to withdraw any explicit consent you have given us to process your personal data. Please note if you withdraw your consent it will not affect the lawfulness of any processing of your personal data we have carried out before you withdrew your consent. Should you wish to do so you can change your consent preferences at any time. To withdraw your consent for us to send your Third-Party Promotions change your preferences on your account settings and/or by contacting us at contact@plytime.com

13. How can you restrict or object to our processing your personal information

You can ask us to suspend the way in which we are using your information in certain scenarios, or object to our processing your data where we are relying on a legitimate interest ground (or those of a third party) and you feel it impacts on your fundamental rights and freedoms, or where we are processing your personal data for direct marketing purposes. In some cases where you object, we

may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Please note that if you want us to restrict or stop processing your data this may impact on our ability to provide our services. Depending on the extent of your request we may be unable to continue providing you with our service.

Any queries or concerns about the way in which your data is being used can be sent to contact@plytime.com

14. Automated decision making and profiling

To provide you with our services, it is necessary for us to conduct profiling and automated decision making on your data consisting of:

- Screening applications from prospective tutors to check that your qualifications match our criteria and you have the right to work in the UK
- Screening user messages sent on the Site to ensure contact details are kept private
- Screening tutoring sessions to ensure safeguarding is respected, personal details are not exchanged and the quality of the tutoring is appropriate
- Compiling metrics for Tutors on behaviours, activity on the Site, and availability to determine which requests you receive and Tutor performance

Should you wish to discuss or contest this decision or request that a person is involved in this automated decision, which you have a legal right to do, please email contact@plytime.com.

15. How to contact us and request information

Requests for information about our Statement can be emailed to contact@plytime.com or requested in writing to:

Plytime Ltd
PO Box 862,
Lymm,
WA15 5LB

We keep our Statement under regular review. This Statement was last updated on 17/11/2023.