



POCKET MATHS TUTOR

Privacy Policy

How Pocket Maths Tutor collects, uses and protects personal data

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Policy owner	Michael Thompson

Michael Thompson trading as Pocket Maths Tutor, sole trader
60 Charter Road, Axminster, Devon, EX13 5GR
hello@pocketmathstutor.com
<https://pocketmathstutor.com>



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Pocket Maths Tutor is committed to handling personal data lawfully, fairly, transparently and securely. This version reflects the current PMT Membership Hub and Pocket Support service.

1. Who is responsible for your information

The data controller is Michael Thompson trading as Pocket Maths Tutor, sole trader. Correspondence address: 60 Charter Road, Axminster, Devon, EX13 5GR. Email: hello@pocketmathstutor.com. Website: <https://pocketmathstutor.com>.

Pocket Maths Tutor is registered with the Information Commissioner's Office. Registration number: ZC083946.

2. Who this policy applies to

This policy applies to parents, guardians, students, prospective customers, website visitors and other people who communicate with Pocket Maths Tutor.

3. Personal data we may collect

- Identity information: parent, guardian and student names, usernames and account identifiers.
- Contact information: email addresses, postal addresses and telephone numbers.
- Educational information: year group, tier, working or target grade, confidence, learning needs, questions, submitted work and support history.
- Membership information: programme, pathway, attendance, access permissions, account activity, Pocket Support acknowledgement status and communications.
- Payment information: transaction status, dates, amounts, subscription status and limited billing information. Stripe processes card payments; PMT does not normally see full card details.
- Lesson information: voice, display name, typed chat, optional camera image and other contributions captured in live lesson recordings.
- Pocket Support information: text messages, photographs/screenshots of maths questions and working, PDFs or other permitted attachments, voice notes, timestamps, replies, status history, acknowledgement records and conduct or safeguarding records arising from use.
- Enquiry and complaint information: information supplied through website forms, email, telephone or written correspondence.
- Website and device information: IP address, browser, device, cookie identifiers, page activity, analytics and advertising interactions where permitted.
- Safeguarding information: records necessary to identify, assess, report or respond to a child-protection concern.

4. Special category and sensitive information

PMT does not routinely ask for medical, health, disability or other special category information. A parent or guardian may choose to share limited information where genuinely needed to make a reasonable learning adjustment or protect a student.

Where special category information is processed, PMT will identify an appropriate legal condition. Please do not send unnecessary sensitive information through ordinary email or Pocket Support.

5. How information is collected

- directly from parents, guardians and students;
- through the website and forms, including Membership enquiries and onboarding;
- through Stripe payments and subscription records;
- through Tutor LMS, WordPress and the PMT member platform;
- during Google Meet or other approved live sessions;
- through lesson recordings and learning resources;
- through Pocket Support inside the authenticated PMT platform;
- through cookies, analytics and advertising technologies where permitted; and
- from schools or professionals where authorised or another lawful basis applies.

6. Lawful bases for processing

Purpose	Typical lawful basis
Responding to enquiries and taking steps before a customer joins	Steps before contract; legitimate interests

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Delivering Membership, lessons, resources, Pocket Support and account access	Contract; legitimate interests
Processing payments and maintaining financial records	Contract; legal obligation; legitimate interests
Recording group lessons and providing recordings	Legitimate interests in educational delivery, catch-up, quality assurance and safeguarding, balanced against student privacy
Safeguarding and child protection	Legal obligation where applicable; vital interests; legitimate interests; substantial public interest conditions where relevant
Handling complaints and defending legal claims	Legitimate interests; legal obligation
Service administration, security and fraud prevention	Legitimate interests; legal obligation
Marketing and optional promotional contact	Consent or another lawful route permitted by electronic marketing law
Non-essential analytics and advertising cookies	Consent where required

Where legitimate interests are used, Pocket Maths Tutor considers purpose, necessity and impact, with particular care for children's data and their best interests.

7. Children's information

The contracting customer is normally the parent or legal guardian. Parents and guardians must provide accurate information and explain relevant privacy arrangements to the student in an age-appropriate way.

Students have data-protection rights in their own information. PMT will consider the student's age, understanding, maturity and best interests when responding to requests involving their information.

8. Group lesson recordings

All three weekly group sessions are recorded. Recordings may capture student voices, display names, typed chat messages and optional camera images. Cameras are optional.

- Recordings are used for catch-up, revision, educational delivery, quality assurance and safeguarding.
- Students may keep their camera off, mute when not speaking and use a first name or agreed initial.
- Recordings are restricted to authorised PMT users and service providers who need access.
- Recordings normally remain available for up to 12 months from the session date, unless a particular recording must be retained for safeguarding, complaint or legal reasons.
- Students and families must not copy, download, screen-record or share recordings.

9. Pocket Support inside the PMT platform

Pocket Support is delivered through the authenticated PMT member platform. It allows eligible students to send focused maths questions and receive replies from PMT. Routine messages are not public and are not automatically copied to a parent. Parents are informed of the arrangement through Membership onboarding.

- Pocket Support may contain text, maths-work images/screenshots, permitted PDFs/documents, short voice notes, timestamps and PMT responses.
- Voice notes are limited to three minutes per recorded note at launch and must remain relevant to maths learning or service administration.
- The platform records the student's first-use acknowledgement version and timestamp. No separate Pocket Support agreement or external acknowledgement form is used for this service-specific acknowledgement.
- Support threads and protected media are access-controlled. The owning student and authorised PMT operator(s) may access the thread as required for service delivery.
- Media is served through authenticated/protected routes rather than ordinary public file URLs.
- Routine support communications normally remain part of the service record for the retention period below. Safeguarding, complaint, conduct or legal records may be preserved longer.
- PMT may contact a parent or guardian, provide relevant information or restrict access where reasonably necessary for service administration, conduct, safeguarding, complaints or legal obligations.
- Pocket Support is not an emergency or crisis service. Students are told not to rely on it for urgent help.

10. Website cookies, analytics and advertising

The website may use essential cookies needed for security, account access, payments and site operation. With consent where required, it may also use Google Analytics 4, Meta Pixel or similar tools to understand website use, measure advertising and improve marketing. Non-essential technologies should not be activated until the relevant consent choice has been made.

11. How we use personal data

- respond to enquiries and arrange Membership conversations;
- create and manage student and parent/customer records;
- manage Pocket Support eligibility, acknowledgements, threads and notifications;
- deliver live lessons, recordings, resources and Pocket Support;
- recommend a suitable pathway and provide learning guidance;
- process payments, deposits, refunds and cancellations;
- communicate programme information and service updates;
- maintain professional boundaries, audit trails and safeguarding controls;
- maintain conduct, complaint and safeguarding records;
- protect accounts, investigate misuse and improve security;
- analyse and improve services and website performance; and
- send marketing where a lawful basis exists.

12. Service providers and data sharing

Provider or category	Purpose
Stripe	Payments, refunds and fraud prevention
WordPress, Tutor LMS, hosting and security providers	Website, account, course and platform operation
Google Workspace and Google Meet	Email, administration, live lessons and document storage
Bunny.net or another approved video provider	Secure video hosting and streaming
Website form providers such as WPForms	Enquiry and onboarding form processing
Google Analytics 4 and Meta Pixel	Analytics and advertising measurement where consent is obtained
Professional advisers and insurers	Legal, accounting, compliance and claims support
Safeguarding or law-enforcement bodies	Protection of a child, compliance with law or response to a lawful request

Pocket Maths Tutor does not sell personal data to advertisers.

13. International transfers

Some technology providers may process information outside the United Kingdom. Where required, PMT relies on an approved adequacy arrangement, recognised contractual safeguards or another lawful transfer mechanism.

14. Data security

- restricted account access and appropriate passwords;
- two-factor authentication where available;
- approved business accounts rather than personal social media accounts;
- secure meeting links and controlled access to lesson recordings;
- authenticated Pocket Support threads and protected media routes;
- entitlement checks for Membership-only services;
- cache exclusions for dynamic protected member pages;
- reasonable device, backup and software security;
- limited access to safeguarding and complaint records; and
- review and deletion of information that is no longer required.

15. Retention schedule

Record type	Normal retention period
Unsuccessful Membership or service enquiries	12 months after the last meaningful contact

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Pocket Support acknowledgement/onboarding records	6 years after Membership or the relevant service ends
Website form submissions that do not become a customer record	12 months after submission or last contact
Membership, account and contract administration	6 years after Membership or the relevant service ends
Payment, refund and accounting records	6 years after the relevant transaction or financial period, as appropriate
Routine email and Pocket Support communications	12 months after Membership ends, unless incorporated into another record
Group lesson recordings	Up to 12 months from the session date
One-to-one lesson notes and ordinary educational records	12 months after the relevant service ends, unless needed for contract or complaint records
Complaints and formal outcomes	6 years after the complaint is closed
Marketing contact details	Until consent is withdrawn or contact is no longer appropriate; a minimal suppression record may be retained
Safeguarding and child-protection records	For a period determined by the concern, safeguarding guidance and legal requirements
Security logs, backups and technical records	For the period reasonably required for security and recovery, then overwritten or deleted in normal cycles

16. Your rights

- be informed about how personal data is used;
- request access to personal data;
- ask for inaccurate information to be corrected;
- request deletion where the legal conditions are met;
- request restriction of processing;
- object to processing based on legitimate interests or direct marketing;
- receive certain data in a portable format where applicable; and
- withdraw consent where consent is the lawful basis.

To exercise a right, contact hello@pocketmathstutor.com. PMT may need to verify identity and authority, particularly where a request concerns a child.

17. Complaints about data protection

A data-protection complaint may be sent to hello@pocketmathstutor.com or to the postal address in section 1. PMT will handle it without undue delay and in line with current legal requirements. Individuals also have the right to complain to the Information Commissioner's Office.

18. Changes to this policy

This policy may be updated when services, technology or legal requirements change. The current version and effective date will be published on the website.

Reference framework

- UK GDPR and Data Protection Act 2018, as amended, including the Data (Use and Access) Act 2025.
- Information Commissioner's Office guidance on children and the UK GDPR, data protection by design/default, data sharing and DPIAs (updated 2026).
- Department for Education safeguarding guidance for out-of-school settings and private tuition (updated February 2026).

Michael Thompson, Owner and Policy Lead

Signature: _____ Date: _____