



ASPIRIO

Registered office : The Braes,
Granville Road, Bath. BA1 9BE

ASPIRIO LTD CUSTOMER DATA PRIVACY POLICY

At Aspirio Ltd, we are committed to protecting the privacy of the individuals whose data we process and meeting our responsibilities to process personal data in a way consistent with the principles set out in data protection laws. Looking after the data you share with us is hugely important, and we want you to feel confident that your data is safe and secure.

This privacy policy describes what personal information Aspirio Ltd collects, what Aspirio Ltd does with it, how Aspirio Ltd protects it and how Aspirio Ltd maintains information collected from Users.

Aspirio Ltd determines the purposes and methods of processing Personal Data as a data controller. Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions by contacting us using the details below.

- **Contact details**

Aspirio Ltd is a UK educational support and mentoring company that works with secondary school children.

Our assigned Data Protection Officer can be contacted directly via:

- **Website:** www.aspirio.co.uk
- **Email:** info@aspirio.co.uk

- **Responsibilities**

The assigned Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Aspirio Ltd collecting/processing their Personal Data.

All Employees/Staff of Aspirio Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and that their consent to the processing of their data is secured.

- **What information we collect, use, and why**

We will only collect your personal information through this website with your consent, which you provide when you complete our form to contact us or book an appointment. The information we will collect may include your name and contact details (including your email address). We do not collect any sensitive personal data (as defined under the Data Protection Act (DPA) 2018).



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We will only hold, use and disclose the information we collect in this way to:

- Answer your enquiries
- Maintain our business relationship
- Share information about our services or news through periodic emails, treating this as 'legitimate interest'. You can let us know that you do not want to receive such information at any time by contacting us directly.
- Meet legal obligations and requirements

The Personal Data collected from you are as follows:

Contact data: We will request your full name, address, phone number and e-mail address.

Payment data: Where it is necessary to process your payment if you are making payment for goods or services supplied to you, then sensitive information, such as your bank account number, may be stored.

Business and relationships: We may collect such Personal Data that you provide to us relating to your contacts and business relationships.

Content: We may collect the content of any data files and communications that you may send us for the purposes of carrying out our dealings with you, together with any relevant physical documents that you may give us as well when these are necessary to provide you with the offered service and or employment. Data we collect may include but are not limited to:

- Address, subject line and body of an email
- Video and/or audio recording of a video message
- Written content of a text, similar app or other content of an instant message
- Relevant social media messages

We may also collect Personal Data that you provide us about client feedback for services provided.

This Personal Data will be retained in line with our retention policy.

The Personal Data we collect will be used for the following purposes but not limited to:

- To carry out our business activities
- To enforce using the appropriate legal process
- Update existing Personal Data
- Manage our products and services
- Monitor and keep records of communications
- To improve the operations of our business where possible
- To comply with legal and regulatory obligations and requirements



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Our legal basis for processing Personal Data:

- To provide products and services
- To receive products and services
- Legitimate interests
- Vulnerability assessments
- Public interest matters
- To comply with legal and regulatory obligations and requirements
- To offer employment

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Develop business partnerships
- To comply with legal and regulatory obligations and requirements

We will use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Correspondence

We collect or use the following information **for student education and welfare**:

- Names and contact details for students/children
- Names and contact details for carers
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information.

The lawful basis we rely on may affect your data protection rights is below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access**—You have the right to ask us for copies of your personal information and to request other information, such as details about where we get personal information from and who we share personal information with. There are some exemptions, which means you may not receive all the information you ask for.
- **Your right to rectification** - You can ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure**—You can ask us to delete your personal information.



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- **Your right to restriction of processing**—You can ask us to limit how we can use your personal information.
- **Your right to object to processing** - You have the right to object to processing your data.
- **Your right to data portability**—You can ask that we transfer the personal information you gave us to another organisation or you.
- **Your right to withdraw consent**—When we use consent as our lawful basis, you can withdraw your consent at any time.

You accept and consent to the practices described in this statement by visiting this website. Any amendments to this statement will be posted on this page. Your continued use of our website will constitute your acceptance of and agreement to any changes. You may withdraw consent anytime by contacting us at the details provided or in line with the Withdrawal of Consent Procedure. If you make a request, we must respond to you without delay and within one month.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **for student education and welfare** are:

- **Consent**—We have your permission after we give you all the relevant information. Your data protection rights may apply, except the right to object. To be clear, you can withdraw your consent at any time.
- **Contract**—We must collect or use the information to enter or carry out a contract with you. Your data protection rights may apply, except the right to object.
- **Legal obligation**—We must collect or use your information to comply with the law. All your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Consent**—We have your permission after we give you all the relevant information. Your data protection rights may apply. To be clear, you can withdraw your consent at any time.
- **Contract**—We must collect or use the information to enter or carry out a contract with you. Your data protection rights may apply, except the right to object.
- **Legal obligation**—We must collect or use your information to comply with the law. All your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.



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Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- **Consent** - We will have your permission after we give you all the relevant information. Your data protection rights may apply, except the right to object. To be clear, you can withdraw your consent at any time.
- **Contract**—We must collect or use the information to enter or carry out a contract with you. Your data protection rights may apply, except the right to object.
- **Legal obligation**—We must collect or use your information to comply with the law. All your data protection rights may apply except the right to erasure, the right to object, and data portability.

Where do we get personal information from

- Directly from you
- Parents or carers

How long do we keep information?

We will only retain your data for as long as necessary to fulfil the purposes we collected it, including satisfying any legal, accounting or reporting requirements. Wherever possible, Personal Data will be minimised and securely destroyed. Storage of Personal Data will follow statutory retention requirements. When deciding the correct time to keep data, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, and processing purposes to see if these can be achieved by other means and legal requirements. For tax purposes, the law requires us to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they stop being customers. We will seek to anonymise personal information so that it can no longer be associated with the individual, in which case we may use this information indefinitely without further notice to you. If you purchase a product from us, we will not hold your card information; it is collected by our third-party payment processors (Stripe), who specialise in the secure online capture and processing of credit/debit card transactions.

Who do we share information with?

Aspirio Ltd will not pass on your Personal Data to third parties without first obtaining your consent. We do not share your Personal Data without first obtaining your consent.

Others we share personal information with

- Parents and carers
- Organisations we need to share information with for safeguarding reasons
- Organisations we're legally obliged to share personal information with



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Cookies

Our website does use cookies for analytics purposes. A detailed outline of cookies is listed below:

Cookies are small files of information stored on your PC's hard drive. They do not collect Personal Information but allow our web server to recognise you when you visit our website.

We may record the type of browser and operating system you use to access our website, any pages you access during your visit, and the number of visits you make. We do this to ensure that the website provides relevant information and improves the overall quality of its services.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. If you do not wish us to use this information, you may set up your website browser to reject or refuse Cookies when first using the website.

Changes to this privacy policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent. We will post any privacy policy changes on this page and if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes) or via a pop-up notice or statement of changes on our website)

You acknowledge and agree that it is Your responsibility to review this Policy periodically and become aware of modifications. This Privacy Notice or Policy was last updated on March 10, 2025. The most up-to-date version can be found on this website.

How to complain

We are committed to working with you to settle any complaint or concern you may have regarding your data privacy. If you have any queries or concerns, please get in touch with us at info@aspirio.co.uk. If you remain dissatisfied, you can complain about how we process your personal information to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the ICO directly online or at their helpline at 0303 123 1113. The ICO will expect you to raise concerns with the organisation before submitting a complaint. Contact us. If you have any concerns regarding this Privacy Notice, our privacy practices, or any other general enquiries, email info@aspirio.co.uk or write to us at The Braes, Granville Road, Bath BA1 9BE.

Last updated: March 2025