



PRIVACY POLICY

Sophia Technologies Ltd.



64 - 66 Wingate Square, Office 5, London SW4 0AF

Registered Company (11541298)

Introduction

This privacy policy will help you understand what information we collect and use at Sophia, and the choices you have associated with that information. If you register with us as clients or as tutors, we will provide you with a detailed privacy notice as part of the terms of use.

In this privacy policy the following words have defined meanings:

Data Controller, Data Processor and Personal Data are defined in the applicable Data Protection Laws.

Data Protection Laws means any laws and regulations in the UK relating to privacy or the use or processing of data relating to natural persons, including: (a) EU Regulation 2016/679 (GDPR) and any legislation implementing or made pursuant to the GDPR; (b) the 2018 Data Protection Act (DPA); (c) the Privacy and Electronic Communications (EC Directive) Regulations 2003 and (d) any laws or regulations ratifying, implementing, adopting, supplementing or replacing GDPR or DPA, in each case, to the extent in force, and as such are updated, amended or replaced from time to time.

Services refers to the services and websites provided by Sophia. Sophia may, from time to time, introduce new products and services.

Sophia, we, our, ours or us refers to Sophia Technologies Limited and its subsidiaries and affiliates (together, the Sophia Group), which provide the Services to you.

You and yours refers to the legal entity reading this privacy policy and any legal entity receiving Services from Sophia.

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1. Information We Collect and Receive

We collect several different types of information to provide Services, including:

- Full Name
- Address
- Email address
- Mobile telephone number
- Teaching Qualifications and Experience
- Teaching Subjects on offer as a Tutor
- Mode of Transportation
- Reference contact details
- DBS details including DBS number and date of issue
- Proof of Identity documents (Passport / Drivers Licence)
- Proof of Address documents (Bank statement / utility bill / council tax etc)
- Technical device information
 - Type of mobile device
 - Unique device identifier
 - Mobile network information
 - Mobile operating system
 - IP address and HTTP referrer information
 - Browser information
 - Time zones
- For tutors:
 - Bank Details
- For parents/customers:
 - Payment Details (to be used via the Stripe payment platform)
 - Preferred location for tuition session
 - Child Details including First Name, Year Group

2. How do we collect information about you?

We collect the information set out above in a variety of ways:

- When you register with Sophia as a tutor or as a client.
- When you contact us on the website via hello@sophia.app
- When you use the Sophia ChatBot via our website www.sophia.app
- When you contact us via the 'Contact Us' facility on our App
- When you complete your registration via our secure Admin portal
- When you complete your registration via the Sophia app

Third Party Data: We may receive information about you from other sources (including publicly available databases) and combine this data with information we already have about you.

Some of the personal data we obtain helps us to update, expand and analyse our records, identify new prospects for marketing, and provide products and services that may be of interest to you.

We will not obtain any information about you from a third party if we do not believe that the third party is acting lawfully.

3. How We Use the Information We Collect and Receive

Sophia may access and use the data we collect as necessary: (a) to provide and maintain the Services; (b) to address and respond to Service issues; (c) to detect, prevent, or otherwise address fraud, security, unlawful, or technical issues; (d) as required by law; (e) to fulfil our contracts; (f) to improve and enhance the Services; (g) to provide analysis or valuable information back to our customers and users; and (h) to provide marketing material suitable to your expressed interests.

Some specific examples of how we use the information:

- Facilitate and improve the usage of the Services
- Arrange for 3rd party service providers to conduct the following checks for tutors:
 - Identity verification
 - “Right To Work”
 - Reference verification checks
 - Disclosure and Barring Service
- Send you service updates, marketing communications (such as newsletters), and service information
- Respond to customer inquiries and support requests
- Conduct research and analysis
- Display content based upon your interests
- Analyse data, including through automated systems and machine learning to improve our Services and/or your experience

Sophia will retain your information as long as your account with us is active, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

4. Lawful Basis for our Processing of Personal Data

Under Data Protection Law, Data Controllers have to justify the use of Data by establishing a “Lawful Basis” of Processing. Below we set out each Lawful Basis in relation to your Personal Data and Special Category Data.

Each Lawful Basis for our Processing or use of Personal Data is as follows:

- a. Where we need to comply with a legal obligation.
- b. Where it is necessary for our legitimate interests (see below) (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your Personal Data in the following situations, which are likely to be rare:

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

Each Lawful Basis for our Processing of Special Category Data is as follows:

- a. Where we need to carry out our legal obligations and in line with our Data Protection Policy or other Related Policy.
- b. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our Data Protection Policy.
- c. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process Special Category Data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Our Legitimate Interests

With regards to our 'legitimate interests' referred to above, these would include, but are not limited to:

- The furtherance of our business operations, services and products.
- The furtherance of our marketing functions and initiatives.
- The pursuit or defence of any claims, rights or litigation or detection of a crime.
- Our accounting or auditing functions and reporting duties.
- The furtherance of our commercial development, strategy, planning or growth including any business sales or transactions.
- The protection of our intellectual property rights, confidential information, security or product development.
- Monitoring and ensuring compliance with our policies, processes and procedures such as security, fraud prevention, employee benefits and training.

5. Analytics, Cookies and Other Web Site Technologies

Sophia is continuously improving our websites and products by using various third-party web analytics tools, which help us understand how visitors use our websites, desktop tools, and mobile applications, what they like and dislike, and where they may have problems. We maintain ownership of this data and do not share this type of data about individual users with third parties.

Google Analytics:

We use Google Analytics as described in [“How Google uses data when you use our partners' sites or apps.”](#) You can prevent your data from being used by Google Analytics on websites by installing the Google Analytics opt-out browser add-on [here](#). We also employ IP address masking, a technique used to truncate IP addresses collected by [Google Analytics](#) and store them in an abbreviated form to prevent them from being traced back to individual users. Portions of our website may also use Google Analytics for Display Advertisers including DoubleClick or Dynamic Remarketing which provide interest-based ads based on your visit to this or other websites. You can use [Ads Settings](#) to manage the Google ads you see and opt-out of interest-based ads. We also use Adobe Marketing Cloud as described [here](#). You can opt-out of use of this information as described below.

Tracking Technologies:

Sophia and our partners use cookies and similar tracking technologies to track user traffic patterns and hold certain registration information. Tracking technologies also used are beacons, tags and scripts to collect and track information and to improve and analyse our Service. If you wish to not have the information these technologies collect used for the purpose of sending you targeted ads, you may [opt-out here](#), or if located in the European Union, [click here](#). The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can still review the website if you choose to set your browser to refuse all cookies; however, you must enable cookies to establish an account and to install the Services. To manage Flash cookies, please [click here](#).

Examples of Cookies We Use:

| Cookie Type | Purpose | Description |
|--------------------|---|--|
| Session Cookies | We use these cookies to operate our websites. | Some cookies are essential for the operation of Sophia websites. If a user chooses to disable these cookies, the user will not be able to access all of the content and features. |
| Preference Cookies | We use these cookies to remember your preferences. | When you register at a Sophia website, we use cookies to store unique, randomly assigned user IDs that we generate for administrative purposes. These cookies enable you to enter the Sophia sites without having to log on each time. |
| Security Cookies | These cookies are used for general security purposes and user authentication. | We use security cookies to authenticate users, prevent fraudulent use of login credentials, and protect user data from access by unauthorized parties. |

5. Information Sharing

Ensuring your privacy is important to us. We do not share your personal information with third parties except as described in this privacy policy. We may share your personal information with: (a) third party service providers; (b) business partners; (c) and as needed for legal purposes (including fulfilling our legal obligations). Third-party service providers have access to personal information only to the extent required to perform their functions and wherever possible, they must process the personal information in accordance with this Privacy Policy and additional data protection and privacy terms in our contract with them (which are no less onerous than the terms of this privacy policy).

Examples of how we may share information with third-party service providers include:

- Payment processing and fraud prevention
- Completion of DBS checks
- Completion of reference checks
- Handling of issuance of Insurance Policies and related claims on behalf of our Tutors
- Sending marketing communications

- To assist with customer service queries
- Conducting research and analysis

Third-party recipients include the following:

- Sophia entities.
- Legal representatives.
- Accountants and/or Auditors.
- Regulators and professional bodies.
- Government or statutory bodies.
- Tax authorities.
- Insurers, insurance brokers.
- Cloud service providers.
- Industry regulators.
- Disclosure and Barring Service.
- Consultants or Contractors working on our behalf.

Examples of how we may disclose data for legal reasons include:

- As part of a merger, sale of company assets, financing or acquisition of all or a portion of our business by another company where customer information will be one of the transferred assets.
- As required by law, for example:
 - to protect our rights;
 - to protect your safety (or the safety of others);
 - to support a safeguarding investigation
 - to investigate fraud; or
 - To the extent required by Industry regulators
 - to respond to a government request.

6. Communications

Sophia may need to communicate with you for a variety of different reasons, including:

- Responding to your questions and requests. If you contact us with a problem or question, we will use your information to respond.
- Sending you Service and administrative emails and messages. We may contact you to inform you about changes in our Services, our Service offerings, and important Service-related notices, such as billing, security and fraud notices. These emails and messages are considered a necessary part of the Services, essential to enable Sophia to fulfil its contractual and regulatory obligations.

7. Accessing Your Data

Where Sophia is acting as a data controller, Sophia will also, when you request, provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. If Sophia is not a data controller for your personal data, you should request this information from the relevant data controller.

We may transfer personal information to companies that help us provide our Service, and when we do, these transfers to subsequent third parties are, wherever possible, covered by appropriate transfer agreements that comply with applicable law. We will retain personal data we process on behalf of our customers as needed to provide Services to our customer and to the extent required for our internal general administration. Also, we will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

8. Security

Sophia follows generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received, however, no security measure is perfect.

9. Changes to this Statement/Contact Us

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will provide notice on this website, and we may notify you by email (sent to the e-mail that we have on record, if any), prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

10. Contacting Sophia

Please contact Sophia at privacy@sophia.app if:

- you have any questions about this Privacy Policy or Sophia' practices relating to privacy;
- we hold personal information about you and you want it to be removed from our database or opt out from receiving communications from us; or
- if we hold personal information about you and you want to opt out from receiving communications from us; or
- if you need assistance in reviewing your information.

Sophia will respond to your request within a reasonable time and in any event within any deadline mandated by applicable law.