

GDPR 2018 PRIVACY NOTICE

This document refers to personal data, which is defined as information concerning any living person, (a natural person, who hereafter shall be called the Data Subject), that is not already in the public domain.

The General Data Protection Regulation (GDPR), which is EU-wide and far more extensive than its predecessor, the Data Protection Act, along with the Privacy and Electronic Communications Regulation (PECR), seeks to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data, and the unrestricted movement of personal data within the EU, and its storage within the EEA.

1. Who We Are – tokessayhelp.com is a tuition business that carries out online IB Theory of Knowledge lessons and essay feedback services. The term ‘tokessayhelp.com’ hereby refers to the company as a whole, and Thomas Mathews, the owner of said company, and current sole employee.

2. Personal Data

a) For the purposes of providing lessons and essay script reviews, tokessayhelp.com may require personal information such as e-mail addresses. We only collect what is relevant and necessary for the provision of lessons/feedback services. This data is held securely, and is not shared with anyone or any third parties. To be able to process such data, it is necessary that you give your consent for tokessayhelp.com to document and process your personal data. Contact details provided may be used to contact you regarding future lessons, or to provide you with any information pertaining to your tuition.

b) For marketing purposes, tokessayhelp.com may also use the contact details you provide to respond to your enquiries, including making telephone contact and emailing information to you that tokessayhelp.com believes may be of interest to you.

c) In making initial contact with tokessayhelp.com, you consent to the company maintaining a marketing dialogue with you until you either opt out, (which you can do at any time), or we decide to desist in promoting our services. We do not share or broker your data, and you can ask to be removed from our database by emailing enquiries@tokessayhelp.com.

d) Some basic personal data may be collected by you from marketing forms or surveys you complete, from records or our correspondence and phone calls, and details of your visit to our

website, including but not limited to personally identifying information like Internet Protocol (IP) addresses.

e) tokessayhelp.com uses cookies, which are a string of information that a website stores on a visitor's computer, and that the visitor's computer browser provides to the website each time a visitor returns. The website provider may use cookies to help tokessayhelp.com identify and track visitors and their website access preferences. Website visitors who do not wish to have cookies placed on their computer should set their browsers to refuse cookies before using tokessayhelp.com.

f) tokessayhelp.com will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

3 - Legal Basis for processing any personal data

Legitimate interest to respond to enquiries concerning the services provided, and there forward carry out tuition services required by the client.

4 - Legitimate interests pursued by tokessayhelp.com

To assist IB students with their Theory of Knowledge studies and assessments.

5 - Consent

Through agreeing to this privacy notice, you are consenting to tokessayhelp.com processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal or e-mail addresses provided at the end of this privacy notice.

6 - Disclosure

tokessayhelp.com will keep your personal information safe and secure. We will not disclose your personal information unless compelled to, in order to meet legal obligations, regulations, or valid governmental requests. Tokessayhelp.com may also use data in order to prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property and safety of the company and its employees.

7 - Retention Policy

Tokessayhelp.com will process personal data during the duration of any tuition of clients, and will continue to store only the personal data needed for 12 months after the tuition has expired to meet any legal obligations. After 12 months, all personal data will be deleted, unless basic information needs to be retained by tokessayhelp.com to meet our future legal obligations to you, such as erasure details.

8 - Data Storage

All data is held in Spain. tokessayhelp.com does not store personal data outside the EEA.

9 - Your rights as a data subject

At any point whilst tokessayhelp.com is in possession of, or processing your personal data, all data subjects have the following rights:

Right of access - you have the right to request a copy of the information that we hold about you

Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete

Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records

Right to restriction of processing - where certain conditions apply you have the right to restrict the processing

Right of portability - you have the right to have the data we hold about you transferred to another organisation

Right to object - you have the right to object to certain types of processing, such as direct marketing

Right to object to automated processing, including profiling - you also have the right not to be subject to the legal effects or automated processing or profiling

In the event that tokessayhelp.com refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request, tokessayhelp.com can confirm what information we hold about you and how it is processed.

10 - You can request the following information:

Identity and contact details of the person or organisation that has determined how and why to process your data

The purpose of the processing, as well as the legal basis for processing

If the processing is based on the legitimate interests of the company, and the information about these interests

The categories of personal data collected, stored and processed

Recipient(s) or categories of recipients that the data is/will be disclosed to

How long the data will be stored

Details of your rights to correct, erase, restrict or object to such processing

Information about your right to withdraw consent at any time

How to lodge a complaint with the supervisory authority (AEPD)

Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data, and the possible consequences of failing to provide such data.

The source of personal data, if it wasn't collected directly from you.

Any details and information of automated decision-making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

11 - To access the personal data that is held, identification will be required:

Tokessayhelp.com will accept the following forms of identification when information on your personal data is requested: a copy of your driving license, passport or birth certificate, and a utility bill not older than three months. A minimum of one piece of photographic identification listed above and a supporting document is required. If tokessayhelp.com is dissatisfied with the quality of the identification, further information may be sought before personal data can be released. All requests should be made to enquiries@tokessayhelp.com.

12 - Complaints

In the event that you wish to make a complaint about how your personal data is being processed by tokessayhelp.com, you have the right to complain to us. If you do not get a response within 30 days, you can complain to the AEPD.

The details for each of these contacts are:

enquiries@tokessayhelp.com

AEPD - C/ Jorge Juan, 6. 28001 - Madrid
Tel. 901 100 099 - 912 663 517