

Privacy Policy

1. Introduction

1.1. This is the privacy and cookies policy for www.tutormuten.co.za (website). The Website is operated by Tutor Muten Pty Ltd, 28 Wiener St, Vasco Estate, Goodwood, Cape Town, South Africa (**we, us and our**). Our Company Registration Number: K2017357770.

1.2. The privacy policy should be read in conjunction with Tutor Muten terms of usage and terms of booking. Together they set out the basis on which any personal data which we collect from users, or that users provide to us, will be processed by Tutor Muten.

1.3. We are committed to protecting your privacy online. We appreciate that you do not want the personal information you provide to us distributed indiscriminately and here we explain how we collect information; what we do with it and what controls you have.

1.4. By using the website, you consent to the collection and processing of information in accordance with this privacy policy.

1.5. If you are providing personal information on behalf of someone else you need to obtain consent from the individual to do so.

1.6. We reserve the right to change this privacy policy from time to time by changing it on the website. This privacy policy was last updated on 18 September 2020.

2. Information we may collect from you

2.1. We may collect and process the following personal information about you:

2.1.1. "Registration Data"

when you register you create an account sign-in facility, we may collect your login and password details, name, mobile phone number, email address and address;

2.1.2. "Message Content"

when you contact other users on the website those messages (and their replies) are stored including any attachments and flags, and are also visible to site administrators to ensure that the rules of the site are observed, and to assist in the event of a dispute;

2.1.3. "Lesson Details"

when you transact with any other user through the website, we record details of all tutor session booking requests, cancellations, or other transactions made by you;

2.1.4."Tutor Profile Details"

if you are a tutor, you may add to your profile by completing forms on the website, this information is saved, such as; photo, date of birth, academic history, education and work history, proof of qualifications, details of a proof of identity, whether you have a Disclosure and Barring Service certificate, its date etc., bank details (account number and sort code);

2.1.5."Service Correspondence"

when you communicate with us about the service, for example to report a problem or to submit queries, concerns or comments regarding the website, whether by email, instant messaging or phone, these are saved;

2.1.6."User Generated Content"

information from surveys, promotions and competitions that we may, from time to time, run on the website, if you choose to respond to, or participate in, them, or any material you upload or submit via the website, or any requests for information, are saved;

2.1.7."Visitor Data"

when you are searching on the website, or taking other actions on the website these are saved, for example if you search tutors with an expertise in a particular area.

2.2. You are under no obligation to provide any such information. However, if you should choose to withhold requested information, we may not be able to provide you with certain services.

3. Additional information

3.1. When you visit the website, we may automatically collect additional information about you, such as the type of internet browser or mobile device you use, any website from which you have come to the website, your IP address (the unique address which identifies your device on the internet) and your operating system, which are automatically recognised by our web server. You cannot be identified from this information and it is only used to assist us in providing an effective service on the website and to collect broad demographic information for aggregate use.

4. Uses made of your information

4.1. When the data you provide us is personally identifiable, we process it on three legal bases:

(a) **Consent**: you give clear consent for us to process your personal data for a specific purpose.

(b) **Contract**: the processing is necessary for a contract you have with us or with other users on the website, or because you have asked us to take specific steps before entering into such a contract.

(c) **Legitimate interest:** the processing is necessary for your legitimate interests or the legitimate interests of a third party.

4.2. The purpose and legal basis for processing each of the categories of data in paragraph 2 is as follows:

4.2.1. **Registration Data** is used to identify you when you sign-in to your account and:

4.2.1.1. is necessary to make legally binding contracts with other users using your account (contract);

4.2.1.2. to send you information we think you may find useful or which you have requested from us, including marketing communications such as our periodic email newsletter which you may opt out of at any time (legitimate interest);

4.2.2. **Message Content** is held to enable you to communicate with other users to form a contract for tuition subject to the terms and conditions of the site, and to assist in resolving any disputes that may arise regarding these arrangements (contract);

4.2.3. **Lesson Details** are processed to enable us to provide a record of all bookings you make through the website and provide you with the services and information offered through the website which you request, to verify and carry out financial transactions in relation to payments you make online, and to assist in resolving any disputes (contract);

4.2.4. **Tutor Profile Details** enable you to offer your services as a tutor to be booked on our site and to safeguard the interests of clients (contract);

4.2.5. **Service Correspondence** is processed to enable us to answer your questions and resolve issues you may have with the site or other users (consent);

4.2.6. **User Generated Content** is collected on the basis that you are prepared to share it with other users and the general public, and should not contain personally identifiable information (not personally identifiable);

4.2.7. **Visitor Data** is collected on the basis of consent to the cookie notice. This data is not personally identifying and is processed for the purpose of analysing the use of the website and the people visiting in order to improve our content and services including research into our users' demographics. We may use data on website behaviour to infer your requirements of a tutor or your suitability as a tutor for different clients (not personally identifiable).

4.3. You can tell us not to contact you with information regarding our products and services either at the point such information is collected on the website (by checking or the relevant option) or, where you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise this right at any time by opting out on the "edit account" page, or by [contacting us](#) using the contacting us details at the end of this privacy policy.

5. Retention and Anonymisation

5.1. We will remove the personal information we hold about you, by anonymisation:

5.1.1. within 1 month if you request your personal data to be removed and you have not had any contact with other users, or as soon as practicable if your request is particularly complex;

5.1.2. 15 months after the last activity on the account if you request your personal data to be removed and you have contacted other users who may have a legitimate interest to query the agreements or representations you have made;

5.1.3. after 5 years of inactivity, if you do not request your data removed.

5.2. In anonymisation we remove any information that could allow us to identify you as an individual. This includes names, addresses, phone numbers, and email addresses, dates of birth, and bank details. We permanently delete all scans of documents, photos and DBS information on our databases and those of third-party processors. Once anonymised, an account cannot be reactivated.

5.3. For the prevention of abuse and fraud we retain indefinitely some one-way encoded data which will show a match between new accounts and old accounts, but cannot be used to identify any individual in absence of attempting to set up a new account.

6. Cookies and similar technology

6.1. The website uses cookies or similar technology to collect information about your access to and use of the website. Details of the cookies we use, their purpose and duration are contained in *Appendix 1* to this policy.

6.2. We also use third-party cookies as well as our own to display personalised advertisements on our websites and on other websites. This is called "retargeting" and it is based on browsing activities, such as the subjects you have been searching for and the tutors you have viewed.

6.3. We also use iframes on the website to embed certain third-party content from YouTube and other social medias on certain pages of the website. As a result, cookies from these third parties may be dropped on to your browser. Please refer to the relevant third-party privacy policies for further information.

7. Information sharing

7.1. We may disclose aggregate statistics about visitors to the website, in order to describe our services to prospective partners and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

7.2. We may disclose your personal information to any of our affiliates, or to our agents or contractors who assist us in providing the services we offer through the website, processing transactions, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing support services or in other tasks from time to time. Our agents and contractors will only use your information to the extent necessary to perform their functions.

7.3. When you contract with other users certain of your details (your name, the address specified for the lesson and your mobile phone number) will be shared with the user you are contracting with.

7.4. In the event that we undergo re-organisation or are sold to a third party, you agree that any personal information we hold about you may be transferred to that re-organised entity or third party.

7.5. We may disclose your personal information if legally entitled or required to do so (for example if required by law or by a Court order or if we believe that such action is necessary to prevent fraud or cybercrime or to protect the website or the rights, property or personal safety of any person).

8. Public forums

The website may, from time to time, make comment sections, email messaging and/or other public forums available to its users. Any information that is disclosed in these areas becomes public information and you should exercise caution when using these and never disclose your personal information.

9. Child safety

Protecting the safety of children when they use the internet is very important to us. We recommend that children under 18 years of age do not use the website and that a parent or guardian uses the website on such a child's behalf.

10. External links

The website contains links to external sites. If you follow a link to any third-party website, note that they have their own privacy policies and that Tutor Muten does not accept any responsibility or liability for their policies or processing of users' personal information by such third parties.

11. Payment processing

There are two main options to make a payment, either through Bank Deposit or EFT.

For e-wallet mobile payments, users have to contact the administrator team, for approval, and reference number. We recommend you to use your name in full as subject as a reference also your personal detailed should be included; contact number, name and surname in full.

12. Security

12.1. We place great importance on the security of all personally identifiable information associated with our users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised

personnel have access to personal information. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

12.2. You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via the website whilst it is in transit over the internet and any such submission is at your own risk.

12.3. It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal information if you use a shared computer or a computer in a public place.

13. Your rights

13.1. As mentioned above, you have a right to prevent the use of your personal information for direct marketing purposes.

13.2. You have a legal right under the *Protection of Personal Information Act, 2013* to a copy of all the personal information about you held by us. On request, we will provide you with a copy of this information subject to a fee not exceeding the prescribed fee permitted by law. You also have a right to correct any errors in that information.

13.3. You have a right to be forgotten and to have your personal data deleted, which you may exercise by contacting us using the [contacting us](#) details at the end of this privacy policy. If you exercise this right, we will respond within 1 month, and will arrange anonymisation at the appropriate time as set out in paragraph 5.

14. Contacting us

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to tutormuten@gmail.com or via the [Contact Us](#) page of the website.

Appendix 1 - Policy on Cookies

1. Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you. A number of cookies that we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the Website and will last for longer.

1.1. We use cookies to:

1.1.1. remember that you have used the website before. This means we can identify the number of unique visitors we receive and allows us to make sure that we have enough capacity for the number of users we get;

1.1.2. allow you to navigate the website more quickly and easily;

1.1.3. store your preferences;

1.1.4. customise elements of the layout and/or content of the pages of the website for you;

1.1.5. collect statistical information about how you use the website so that we can improve the website;

1.1.7. provide you with retargeted web-based advertising from Tutor Muten.

1.2. Some of the cookies used on our website are set by us and some are set by third parties who are delivering services on our behalf.

1.3. Third party cookies

Cookies are also set by third parties on the website or by us using third party code. More information about cookies placed by third parties and how to restrict or block their cookies can be accessed by following the link to their website. We use cookies from Google, Doubleclick and Bing.

1.4.1. Google and Doubleclick

We use Google Analytics to see how you arrive at our website, how long you spend on pages, and whether you finish certain activities on our website, such as searching for a tutor or booking lessons. We also use their tool “Tag Manager” that allows us to examine your journey on our website.

A tracking cookie is also added from Doubleclick. This is used to let Doubleclick tell us if you have reached us from one of our paid adverts on Google.

[Google Analytics’ privacy policy.](#) [Doubleclick cookie policy.](#)

1.4.2. Bing

Purpose: We use the Bing service to advertise users to our website, and these cookies are used for marketing and re-marketing purposes.

The cookies set by Bing vary in how long they persist, but last for at least 12 months.

[Bing's privacy policy can be found on Microsoft.com.](#)

Appendix 2 - Changes to this policy

18 September 2020 Original privacy policy.