

# Dr Frost

## Privacy Policy

Dr. Frost Learning – how we collect and use personal data

Last updated: 13/03/2026

### Important information and who we are

This privacy policy gives you information about how we at Dr Frost Learning collect and use your personal data that you give us when you register with us or use our website.

Dr Frost Learning is primarily the processor of personal data which is submitted to us by educational institutions. We process most of the personal data we receive strictly on instructions from those institutions, on their behalf. For more information see [Why we are the processor \(https://www.dr frost.org/data-processor\)](https://www.dr frost.org/data-processor).

However, there is a very small amount of personal data that we do use for our own purposes as a controller. This privacy policy sets out how we use that data, and your rights associated with it.

You can view the most current version of this Privacy Policy online at <https://www.dr frost.org/privacy>



You can find our Children's Privacy Policy at <https://www.dr frost.org/privacy-children>.

### The types of personal data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Data** – includes email address and billing address.
- **Transaction Data** – includes details about payments from you and other details of subscriptions you have purchased from us.
- **Technical Data** – includes an internally generated identifier for an institution, internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Marketing and Communications Data** – includes your preferences in receiving marketing from us and your communication preferences.

We also collect and use aggregated data which is not personal data as it does not reveal your identity.

## How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data when you contact us or use our website. This includes personal data you provide when you:
  - sign up for a subscription;
  - request information about new features to be sent to you;
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- **Payment sources.** If you purchase a subscription, we will receive Contact, Financial and Transaction Data from providers of technical and payment services, not limited to but included Stripe.

## How we use your personal data

### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where we need it to conduct our business and pursue our legitimate interests (for example to prevent fraud and enable us to give you the best and most secure customer experience). We make sure we consider any potential impact on you and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are outweighed by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

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### Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

### To process your subscription

To process your subscription including:

- Manage payments, fees and charges
- Collect and recover money owed to us

When someone (whether that be a school official, an individual tutor, parent, or individual learner) signs up for our paid subscription, we will receive certain information (such as the payer's name) and certain financial information (such as their bank account details). We will use this information to process payment, and can use contact information to get in touch if there are any issues.

**Type of Data:** Contact, Transaction

### Legal Basis:

- Performance of a contract with you
- Necessary for our legitimate interests (to recover debts due to us)

## To use data analytics

To use data analytics to improve our website, service, enhance security, data analysis, testing, system maintenance, customer relationships and experiences and to measure the effectiveness of our communications.

We may use data to help us know how students are using our website, and how we might improve it and your user experience.

**Type of Data:** Technical

### Legal Basis:

- Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to improve our website).

## To send you relevant communications

To send you relevant communications and make personalised suggestions and recommendations to you about website features that may be of interest to you based on your Profile Data

If we have new website features that we think might be helpful to you in particular, we may use your data to tell you about it.

**Type of Data:** Contact, Marketing and Communications

### Legal Basis:

- Necessary for our legitimate interests (to carry out direct marketing, develop our services)
- Consent, having obtained your prior consent to receiving direct communications from us

## Direct marketing

During the registration process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us.

## International transfers

We may send Technical Data to service providers that support us in our work.

Whenever we transfer such Technical Data out of the UK to service providers, we will only transfer your personal data to countries in the EEA and other countries that have been deemed by the UK to provide an adequate level of protection for personal data

## Data security

We have security measures to stop your personal data being accidentally lost, used or accessed in an unauthorised way, changed, or disclosed.

We also only give access to your personal data to people who work for us and who have a real need to know it. They will only process your personal data following our instructions and will need to keep it confidential.

We have procedures to deal with any suspected personal data breach and will tell you and any applicable regulator of a breach where we are legally required to do so.

## Data retention

### How long will you use my personal data for?

We will only keep your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, but we may keep your personal data for a longer time in the event of a complaint or if we reasonably believe there might be a legal dispute concerning our relationship with you.

To determine how long we will keep your personal data, we consider the amount, nature and sensitivity of it, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. **We reserve the right to delete your personal data if you have not logged into your account in two years.**

In some circumstances you can ask us to delete your data. See below for further information.

## Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Ask for access to your personal data (commonly known as a “*subject access request*”).
  - This means we will give you a copy of the personal data we hold about you so you can check that we are processing it lawfully.
- Ask us to correct the personal data that we hold about you.
  - This lets you correct any incomplete or inaccurate data we hold about you, although we may need to check the accuracy of the new data you provide to us.
- Ask us to erase your personal data.
  - You can ask us to erase your personal data where:
    - there is no good reason for us continuing to process it;
    - you have exercised your right to object to processing (see below);
    - we may have processed your information unlawfully; or
    - we are required to erase your information to comply with local law.
  - We may not always be able to comply with your request to erase your personal data for specific legal reasons. If this is the case, we will tell you when you make your request.
- Object to us processing your personal data where we are relying on a legitimate interest as the legal basis for that particular use of your data.
  - Sometimes, we may have legitimate reasons to process your information which outweigh your right to object. We will tell you if this is the case.
- Object at any time to the processing of your personal data for direct marketing purposes.
- Ask us to transfer your personal data to you or to someone else.
  - We will provide to you or the person you have chosen your personal data in a structured, commonly used, machine-readable format.
  - This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data.
  - However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
  - If you withdraw your consent, we may not be able to provide certain products or services to you. We will tell you if this is the case at the time you withdraw your consent.
- Ask for restriction of processing of your personal data.
  - This means you can ask us to suspend the processing of your personal data in one of the following scenarios:
    - If you want us to check the data's accuracy;
    - Where our use of the data is unlawful but you do not want us to erase it;
    - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
    - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us.

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### No fee usually required

You will not have to pay anything to access your personal data (or to exercise any of your other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We could also refuse to comply with your request in these circumstances.

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## What we may need from you

We may need to ask you for specific information to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights).

This is to make sure that personal data is not disclosed to someone who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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## Time limit to respond

We try to respond to all legitimate requests within one month.

Sometimes it could take us longer than a month if your request is complex or if you have made lots of requests. If this is the case, we will tell you so and keep you updated.

## Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us at [support@drfrost.org](mailto:support@drfrost.org).

## Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in March 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes (for example, if you get a new address or email address).

## Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.