

We at Midland Occupational Therapy Services Limited (also trading as School Sensory Solutions) understand that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of our Clients, prospective clients, Service Users and everyone else whose data we may collect or whose data may be shared with us. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Client” means the individual, school or other corporate body entering into contract with us, for either occupational services (for themselves or on behalf of a child) or to obtain access to the Course;

“Course” means the School Sensory Solutions Course developed by us;

“Data Protection Legislation” means, collectively, the UK GDPR and the Data Protection Act 2018, and includes any amendments to them;

“Personal data” is defined in the Data Protection Legislation as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”. In simpler terms, it means any information about you that enables you to be identified, so it covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers and online identifiers;

“Service User” means any individual users of our services, which may include parents or guardians of children, the children themselves, or individual users of our Course;

“We/Us/Our” means Midland Occupational Therapy Services Limited (including any trading names of ours, such as School Sensory Solutions), a company registered in England and Wales under number 08666264, whose registered office is at Dovefields, Little Bridge, Tutbury, DE13 9LW; and

“Website(s)” means, collectively, <https://www.midlandsot.co.uk/> and <https://schoolsensorysolutions.co.uk/>, and includes any sub-domains of these sites.

2. What Does This Policy Cover?

- 2.1 This Privacy Policy explains how we use personal data: how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.
- 2.2 Our Websites may contain links to other websites, such as social media links. Please note that we have no control over how your data is collected, stored or used by other sites and we advise you to check the privacy policies of any such sites before providing any data to them.

3. Your Rights

- 3.1 Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:
 - 3.1.1 The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in clause 11.
 - 3.1.2 The right to access the personal data we hold about you. Clause 9 will tell you how to do this.
 - 3.1.3 The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in clause 11 to find out more.
 - 3.1.4 The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in clause 11 to find out more.
 - 3.1.5 The right to restrict (i.e. prevent) the processing of your personal data.
 - 3.1.6 The right to object to us using your personal data for a particular purpose or purposes.
 - 3.1.7 The right to withdraw consent. This means that if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
 - 3.1.8 The right to data portability. This means that if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
 - 3.1.9 Rights relating to automated decision-making and profiling.
- 3.2 It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed for as long as we have that data.
- 3.3 Further information about your rights can also be obtained from the ICO or your local Citizens Advice Bureau.
- 3.4 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the ICO. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in clause 11.

4. Who Is Responsible for Personal Data We Hold?

- 4.1 Under the Data Protection Legislation, we will be the data controller, and we are responsible for your personal data.
- 4.2 However, please be aware that if you provide us with the personal data of any other person, it is your responsibility to obtain permission from those persons to do so, and you will remain the data controller under Data Protection Legislation.

5. What Data Do We Collect and How Do We Use Your Data?

- 5.1 We may collect, use, store, and transfer different kinds of personal data which we have grouped together as follows. You may give us this information about you if you visit our Website, fill in a contact form, purchase a Course, create an account, use the Course, attend an event or therapy session, or when you correspond with us by phone or email:
 - 5.1.1 **Identity Data** includes usernames, first names and last names. Service Users can choose any username when accessing the Course where applicable.
 - 5.1.2 **Contact Data** includes Clients’ and Service Users’ addresses, email addresses and telephone numbers.
 - 5.1.3 **Financial Data** includes Clients’ billing and payment details. No credit or debit card information is provided to us, as all payments made via our Website will go through an online payment gateway provider, such as PayPal or Stripe.
 - 5.1.4 **Transaction Data** includes details about the contract entered into between us and the Client.
 - 5.1.5 **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Website.
 - 5.1.6 **Profile Data** includes your Service User details, preferences and feedback. We collect this data when you engage with us or create an account to access the Course.
 - 5.1.7 **Usage Data** includes information about how you use our Website and/or the Course.

- 5.1.8 **Marketing and Communications Data** includes your preferences in receiving marketing from us, and your communication preferences.
- 5.2 All personal data is processed and stored securely, for no longer than is necessary or statutorily required in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the applicable Data Protection Legislation at all times. For more details on security see clause 6, below.
- 5.3 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

Purpose/Activity	Type of Data	Lawful basis for processing	Retention Period
To handle enquiries and to interact with prospective Clients	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests	6 months from the date of last communication
To fulfil the contract with Clients	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for the performance of the contract	6 years from the date our contract terminates or expires with the Client
To provide therapy services to Service Users	(a) Identity (b) Contact	Necessary for the performance of the contract	7 years after the last intervention and for 7 years after the Service User turns 18 (if a child)
To provide Service Users with access to the Course	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage	Necessary for the performance of the contract	30 days from the date the Service User last accesses the Course
To conduct marketing activities and make suggestions and recommendations about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage (f) Marketing and Communications	Necessary for our legitimate interests	6 months from the date of last communication
To administer and protect our Websites and the Course, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	(a) Identity (b) Technical (c) Usage	Necessary for the performance of the contract	30 days from the date the Service User last accesses the Course
To use data analytics to improve our Websites, marketing, Client and Service User relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests	As set out in clause 10 below

- 5.4 In certain circumstances, we may collect sensitive personal data, such as children's data. We will ensure any such sensitive personal data is processed only in accordance with the Data Protection Legislation and is anonymised and/or deleted as soon as is appropriate.
- 5.5 In addition, Clients have a legal and regulatory obligation to hold children's data for a specific and extended period of time, based on various circumstances. If you are a Client, you should ensure you are fully aware of such obligations, including checking for updates regularly.
- 5.6 With your permission and/or where permitted by law, we may also use certain data for marketing purposes which may include contacting Clients by email with information, news and offers. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the applicable Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Clients may also opt out of receiving certain marketing emails from us by unsubscribing using the links provided in our emails and at the point of providing your details.
- 5.7 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. Unless we have reasonable grounds to refuse to delete it (where this is permitted under the applicable Data Protection Legislation), we will do so without delay and within no longer than one month from receiving your request.

6. How and Where Do We Store Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the periods specified in the table above (or, where there is no fixed period, the same factors will be used to determine how long it is kept).
- 6.2 All personal data we process is encrypted, including any back-ups.
- 6.3 The majority of your personal data will be stored in the UK. However, the systems and platforms we use may store some of your personal data outside of the UK. Where this happens, we will take reasonable steps to ensure appropriate safeguards are in place, such as binding corporate rules, adequacy regulations, standard contractual clauses, or other lawful transfer mechanisms. Third-party platforms may have their own privacy notices explaining how they handle international transfers and we advise you check the privacy notices of such platforms before providing any personal data.
- 6.4 The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including limiting access to your personal data to those employees, sub-contractors and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so. However, no website, email, or online platform can be guaranteed to be completely secure. You are responsible for keeping your Course account login details confidential.

7. Do We Share Your Data?

- 7.1 We may sometimes contract with other third parties to supply services to you on our behalf. This may include payment providers, Course platform providers, Website hosting providers, email and communication providers, IT, security and technical service providers, and professional advisers, such as accountants or legal advisers.
- 7.2 In some cases, these third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 7.3 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- 7.4 We do not sell personal information. If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described in clause 6.
- 7.5 If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in clause 6.
- 7.6 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

8. How Can You Control Your Data?

- 8.1 In addition to your rights under the Data Protection Legislation, set out in clause 3, when you submit personal data to us, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving marketing emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).
- 8.2 You may also wish to sign up to one or more of the preference services operating in the UK, such as the Telephone Preference Service. These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

9. How Can You Access Your Data?

- 9.1 If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 9.2 All subject access requests should be made in writing and sent to the email address shown in clause 11.
- 9.3 There is not normally any charge for a subject access request. If your request is "manifestly unfounded or excessive" (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 9.4 We will respond to your subject access request within 5 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of progress throughout.

10. Our Websites' Use of Cookies

- 10.1 All cookies used by and on our Websites are used in accordance with current cookie law.
- 10.2 We may place and access first party and third-party cookies on your computer or device, to facilitate and improve your experience of our Websites and to provide and improve our services.
- 10.3 You can view the list of cookies our Websites use, by clicking on the padlock icon in the search bar. You can also block and remove certain cookies in this way.
- 10.4 First party cookies are those placed directly by us and are used only by us. Third party cookies are those placed by websites and/or parties other than us. These cookies are not integral to the functioning of our Websites and your use and experience of our Websites will not be impaired by refusing consent to them.
- 10.5 Before cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those cookies. By giving your consent to the placing of cookies, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of cookies, but certain features of our Websites may not function fully or as intended.
- 10.6 Certain features of our Websites depend on cookies to function. Cookie law deems these cookies to be "strictly necessary". Your consent will not be sought to place these cookies, but it is still important that you are aware of them. You may still block these cookies by changing your internet browser's settings, but please be aware that our Websites may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 10.7 Our Websites may use Google Analytics from time to time. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Websites are used. This, in turn, enables us to improve our Websites and the services we offer. You do not have to allow us to use these cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Websites, it does enable us to continually improve our Websites, making it a better and more useful experience for you. Google's privacy policy is available at: <https://policies.google.com/privacy>
- 10.8 You can choose to delete cookies on your computer or device at any time, however you may lose any information that enables you to access our Websites more quickly and efficiently.
- 10.9 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

11. Contacting Us

- 11.1 To contact us about anything to do with your personal data and data protection, including to make a subject access request, please write to us at info@schoolsensorsolutions.co.uk.
- 11.2 Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under clause 9 above).

12. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on each Website, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of either Website following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated in August 2026.