

## Introduction

This document outlines how TutorPro handles data for the purposes of marketing and monitoring Licensee's LMS instances. TutorPro's Business Development Manager monitors and manages the Client Relationship Management (CRM) System where potential licensee data is held and managed. The Head of Network & Security is responsible for the monitoring tools. The DPO is responsible for overseeing that our systems and processes are compliant.

## Definitions

In this document, the following terms shall have the meanings set out below:

- 1.1 "TutorPro" means TutorPro LTD., a company incorporated under the Companies Act (registered number 2414786) and having its registered office at Mary Street House, Mary Street, Taunton TA1 3DN, U.K.
- 1.2 "Licensee" means a company or organisation with a current subscription, or support and maintenance, agreement to any TutorPro solution or service.
- 1.3 "Data Subject" means an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.4 "Personal Data" means any information relating to an identified or identifiable natural person ('Data Subject').
- 1.5 "Data Controller" means an entity that collects and determines the purposes and means of processing of Personal Data.
- 1.6 "Data Processor" means an entity that processes Personal Data based on the instructions of a controller.

## Client Relationship Management (CRM)

Salesforce CRM system has been selected by TutorPro, in part owing to the fact it is a General Data Protection Regulation (GDPR) compliant organization. The data TutorPro holds in Salesforce is for potential and existing Licensees, globally. The Salesforce instance is hosted in the USA. TutorPro's relationship, or potential relationship, is usually with the administrator and purchaser of the Learning and Development solutions. This could include, but not limited to, IT Trainers, IT Training Manager/Director, HR Manager, CIO and key contacts in Procurement. The Personal Data we hold in the CRM is:

### Potential Licensees

- First Name, Last Name, Job Title, Work Phone Number, Work Email, Office Address

### Existing Licensees

- First Name, Last Name, Job Title, Work Phone Number, Work Email, Office Address

### Former Licensees

- TutorPro removes the data of Former Licensees, as detailed in the [Client Success Offboarding Process](#) document.

### EU Data Specific

In TutorPro's previous CRM system, Zoho, there was no record of how the data for EU potential licensee's data was obtained. In light of this, all EU contacts have been deleted and all Data Subjects have been emailed to notify them that all of their data has been removed and they must register new interest via the updated Contact Us page on the website, if they wish to do so. This email containing their website checkbox selection is now saved to their CRM Contact' details.

### Monthly Data Audit

An audit is conducted on the first Monday of each month to ensure any data on EU residents not actively expressing interest in our solutions, or current licensees, is removed from the CRM system.

## TutorPro Website

TutorPro Ltd. 10 High Street, Wellington. Somerset. TA21 8RA. (Reg No: 2414786)  
US: +1 (404) 448-1198 UK: +44 (0) 1823 661669  
[www.tutorpro.com](http://www.tutorpro.com) [support@tutorpro.com](mailto:support@tutorpro.com)

The TutorPro website, developed with WordPress, provides the ability for people to positively opt in. We do not use pre-ticked checkboxes and we use clear, plain language that is easy to understand, asking the Data Subject for consent if an EU-resident. This message includes an active acceptance 'tick box' where potential licensees must indicate their desired level of engagement with TutorPro. We are very clear about what we're going to with the data once they submit their details. Any Personal Data we receive via the TutorPro Website is stored in Salesforce, where we record when and how we received the data, and is not shared with any third-party.

## Marketing Communications

Currently all marketing communications are sent via email, including using the relevant features of Salesforce CRM. TutorPro does not use any other third-party marketing Data Processors. All communications include an unsubscribe link. Once an unsubscribe message is received, the Client Success team removes the data subject from TutorPro's CRM system. TutorPro will act on all unsubscribe requests in a timely manner, and aims to do this within 30 days, at a maximum, to ensure the data subject is removed before the next communication is sent.

## Monitoring Tools

TutorPro uses a selection of monitoring tools. These tools include Pseudonymous and Anonymous data, defined below.

TutorPro's DPO is responsible for ensuring that the monitoring tools used are secure and only capture reliable data.

*"Pseudonymous Data" means personal data that cannot be tied to a specific data subject without additional information that is stored separately, with technological measures to ensure the data is not combined with that additional information.*

*"Anonymous Data" means data that cannot ever be connected to an identified or identifiable person.*

### Matomo

Matomo is hosted on the AWS server in Ireland and collects Pseudonymous Data. The purpose of Matomo is to track usage of the Licensee's LMS instance. All statistics collated are aggregated into one statistics pool. The data collected includes:

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[www.tutorpro.com](http://www.tutorpro.com) [support@tutorpro.com](mailto:support@tutorpro.com)

- The data subject's approximate location, at City level.
- The web browser + plugins being used
- The operating system and screen resolution being used
- The device being used: PC or Phone
- The pages visited and actions performed in the LMS, including entry and exit pages
- Referring website or direct entry
- IP address
- Frequency and number of visits.

A cookie is set in the browser of the user to do this.

### Why do TutorPro use this?

This information is collected in order to improve the LMS product. The data captured is used to ensure we support and develop for the commonly used technology. The Head of Network & Systems shares the statistics with TutorPro's CEO, VP Product, and Business Development Manager.

### OSSEC

OSSEC is hosted in the AWS server in London and collects Anonymous Data. OSSEC is security software used to protect our LMS hosting servers. It provides intrusion detection through various methods including log analysis, system integrity checking, rootkit detection. Data captured is system related and does not collect any personal data of any data subject.

### Nagios

Nagios is hosted in the AWS server in London and collects Anonymous Data. Nagios is used to monitor and track the status of our LMS hosting servers and the services that run on them. Data captured is purely related to the systems and network and does not collect any personal data of any data subject.

### Google Analytics

TutorPro uses Google Analytics to monitor the traffic on the TutorPro website. We have reviewed the GDPR settings that Google provides and used the newly introduced granular data retention controls, which allows TutorPro to manage how long user and event data is held on Google servers. The default settings for this was 26 months, TutorPro has changed this to the least amount of time available: 14 months, as we do not require the data for reporting purposes past 12 months.

## Data Privacy

The Personal Data of all Data Subjects is only accessible by appropriate TutorPro employees. TutorPro does not share any data, unless required to do so, by law, and would never sell personal data to anyone.