



British International Remote School (BIRS)

Privacy Policy

Academic Year 2026–2027

Document Version: 1.0

Policy Owner: The Principal

Approval Date: 13 July 2026

Review Date: 13 July 2026

Next Review: July 2027

Effective Date: 14 July 2026

1. Introduction & Who We Are

Welcome to the British International Remote School (BIRS) ("BIRS", "we", "us", or "our"), a trading name of eLearnSmart Ltd (Company number 14941467). We are committed to protecting the privacy and security of the personal data we collect from parents/guardians ("Parents", "You") and the students ("Students", "Your Child") they enrol in our online educational programmes and services.

This Privacy Policy outlines how eLearnSmart Ltd, T/A British International Remote School (BIRS), collects, uses, maintains, stores, and discloses personal data in compliance with UK data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Our Contact Details:

- Entity: eLearnSmart Ltd, T/A British International Remote School (BIRS)
- Company Registration Number: 14941467
- Registered Address: 167–169 Great Portland Street, 5th Floor, London, W1W 5PF
- Email: contact@thebirs.co.uk
- Website: <https://thebirs.co.uk/>

2. What Information We Collect

We may collect and process the following categories of personal data:

2.1 Information Provided by Parents/Guardians During Enrolment or Application

- Parent/Guardian Full Name.
- Parent/Guardian Email Address.
- Parent/Guardian Phone Number.
- Parent/Guardian Country of Residence and Full Address.
- Relationship to the Student.
- Securely hashed password for your BIRS portal account.
- Payment details for tuition fees (processed securely via Stripe; we do not store raw card details).

2.2 Information About the Student (Provided by the Parent/Guardian)

- Student's Full Name.
- Student's Date of Birth.
- Student's Gender (processed as necessary for legal administrative and UK reporting requirements).
- Student's Primary Language Spoken.

- Student's Current or Intended School Year Group / Key Stage (covering Key Stages 2, 3, and 4).
- Curriculum package selections and chosen subjects.
- Intended start date.
- Details regarding specific learning needs, Special Educational Needs (SEN), or relevant medical conditions (processed only with your explicit, opt-in consent to ensure appropriate educational support).

2.3 Information Related to Student Participation and Progress

- Attendance logs and records for live virtual lessons.
- Academic progress notes, assignments, homework submissions, and teacher observations.
- Communications between Parents/Students and BIRS academic or support staff.

2.4 Automatically Collected Information (Website and VLE Usage)

- Technical data, including your Internet Protocol (IP) address, browser type and version, time zone setting, browser plug-in types, operating system, and platform.
- Usage data, including the full Uniform Resource Locators (URL) clickstream to, through, and from our Website (with date and time), page response times, download errors, and page interaction data.
- Cookies and related tracking identifiers (please refer to our Cookie Policy).

2.5 Information from Third Parties

We may receive details about you or your child if you use other distinct digital platforms operated by eLearnSmart Ltd. We also partner with third-party service providers (including sub-contractors, payment processors, and analytics platforms) and may receive processing information from them in compliance with this policy.

3. How We Collect Your Information

Directly From You: When you complete forms on our website (such as preliminary interest forms or the formal BIRS application form), set up user accounts, submit payments, or contact us by email or phone.

Automatically: Through your interactions with our Virtual Learning Environment (VLE) and website via cookies.

Through Educational Participation: Generated dynamically when students log in, attend live classes, and complete coursework.

4. Lawful Basis for Processing Personal Data

Under the UK GDPR, we process personal data under the following lawful bases:

- **Contractual Necessity:** To register, onboard, and provide virtual schooling services to you and your child (e.g., managing enrolment, scheduling live lessons, and processing tuition fees).
- **Explicit Consent:** For processing sensitive personal data (such as health or SEN details), utilising student photography/videography in school publications, or sending direct marketing communications. You may withdraw consent at any time.
- **Legitimate Interests:** To administer and secure our website, monitor and improve our VLE interface, compile anonymous usage statistics, and ensure our systems function effectively.
- **Legal Obligation:** To comply with statutory legal requirements, particularly UK child protection, safeguarding, and financial auditing standards.

5. How We Use Your Personal Data

We utilize your information to:

- Process your child's registration and manage the student profile.
- Deliver, administer, and optimize our remote educational programmes.
- Record attendance and assess student progress.
- Process secure tuition fee payments via Stripe.
- Communicate critical updates, academic feedback, and system notices.
- Deliver opted-in marketing communications regarding BIRS programmes.
- Ensure the safety, security, and integrity of our online classrooms and portals.

- Meet statutory safeguarding obligations.

6. Data Sharing and Disclosure

BIRS does not sell, trade, or rent personal data. We only share personal data with trusted third parties under strict processing parameters:

- Service Providers: Secure third-party platforms assisting our operations, including payment processing (Stripe), Virtual Learning Environment (VLE) and LMS hosting components, standard communication systems and email marketing services, and curriculum-integrated digital learning tools (e.g., IXL).
- Legal & Safeguarding Demands: When legally compelled to protect student welfare, prevent fraud, or respond to regulatory authorities.
- Business Transfers: In the event of an organizational merger, acquisition, or asset transfer.

7. International Data Transfers

Your personal data is primarily stored on secure servers within the United Kingdom (including our core web hosting with Hostinger).

For specific cloud operations, email deliveries, and integrated tools (such as IXL), data may be accessed by, or transferred to, partners located outside the UK and European Economic Area (EEA), such as the United States.

To guarantee protection, all international transfers to countries without a UK Adequacy Decision are safeguarded using:

- The UK's International Data Transfer Agreement (IDTA).
- The UK Addendum to the EU Standard Contractual Clauses (SCCs).
- Supplemental technical security measures (such as end-to-end encryption) where appropriate.

8. Data Security

We employ industry-standard technical and organizational security protocols, including:

- Secure Sockets Layer (SSL) encryption for all web-based transactions and portals.
- Robust password hashing and encryption for all user accounts.
- Role-based access permissions restricting personal data to authorized staff on a need-to-know basis.
- Regular technical audits of our digital infrastructure.

Please note that no digital transmission or online storage can be guaranteed 100% secure; however, we take all reasonable steps to safeguard your data.

9. Data Retention

We retain personal data only as long as necessary to fulfill its designated purpose, comply with legal requirements, or resolve disputes:

- Safeguarding & Pupil Records: Retained in line with UK education guidelines (generally stored securely until the student reaches the age of 25).
- Academic Records: Retained for at least 7 years post-leaving.
- Financial & Billing Records: Retained for a minimum of 6 years in accordance with UK tax laws.
- Marketing Data: Deleted immediately upon withdrawal of consent.

10. Your Data Protection Rights

Under UK data protection laws, you and your child have the following rights:

- Right of Access: Request a copy of the personal data we hold.
- Right to Rectification: Request correction of inaccurate or incomplete data.
- Right to Erasure ('Right to be Forgotten'): Request data deletion under specific legal circumstances.
- Right to Restrict Processing: Request that we limit how we process your data.
- Right to Data Portability: Request transfer of your data in a structured, machine-readable format.
- Right to Object: Object to our processing based on legitimate interests or direct marketing.

- **Right to Withdraw Consent:** Easily withdraw consent at any time where consent is our lawful basis.

To exercise these rights, email contact@thebirs.co.uk. If you remain unsatisfied with our handling of your data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) (www.ico.org.uk).

11. Children's Privacy

Our educational services are directed at students aged 7 to 16. Enrolment and account setup must be completed exclusively by a parent or legal guardian.

We process student data to fulfill our contract with the parent, protect student welfare (safeguarding), and deliver our academic curriculum. Any optional use of a student's personal data (such as promotional photography) requires explicit, revocable parental consent. Parents have the right to review, update, or request the deletion of their child's record at any time, subject to our statutory record-retention obligations.

12. Cookies

Our website uses cookies to support essential features and compile traffic analytics. For complete details, please read our Cookie Policy.

13. Changes to This Privacy Policy

We update this Privacy Policy periodically to align with operational shifts or regulatory changes. Significant changes will be communicated on this page with an updated "Effective Date" or via email notification.

14. Contacting Us

For any questions regarding this policy or our data practices, please contact:

- eLearnSmart Ltd, T/A British International Remote School (BIRS)
- Email: contact@thebirs.co.uk
- Registered Address: 167–169 Great Portland Street, 5th Floor, London, W1W 5PF

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Operated by eLearnSmart Ltd

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Telephone: 0208 191 3630

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