

PRIVACY POLICY

Last Updated :
20th of July, 2026.

1. About this Privacy Policy

DIGITAL SCALE LIMITED (“Edu4u”, “we”, “us” or “our”) is committed to protecting and respecting the privacy of individuals whose personal data it processes.

This Privacy Policy explains how DIGITAL SCALE LIMITED collects, uses, stores, shares and otherwise processes personal data in connection with the operation of the Edu4u Agents CRM and the educational consultancy services provided by Edu4u.

Edu4u processes personal data in accordance with the United Kingdom General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018 and all other applicable data protection legislation.

This Privacy Policy applies to all personal data processed by Edu4u in its capacity as a data controller and explains the rights available to individuals in relation to their personal data.

By accessing or using the Edu4u Agents CRM, engaging with our educational consultancy services, or otherwise interacting with Edu4u, you acknowledge that you have read and understood this Privacy Policy.

2. Who We Are

DIGITAL SCALE LIMITED (Company No. **17328393**) is a company incorporated and registered in **England and Wales** with its registered office at:

128 City Road
London
EC1V 2NX
United Kingdom

DIGITAL SCALE LIMITED operates the Edu4u Agents CRM and provides educational consultancy services through the Edu4u platform.

For the purposes of the United Kingdom General Data Protection Regulation (“UK GDPR”), **DIGITAL SCALE LIMITED** is the **Data Controller** responsible for determining the purposes and means of processing personal data collected through the Edu4u Agents CRM and related services.

As the Data Controller, DIGITAL SCALE LIMITED is responsible for ensuring that personal data is processed fairly, lawfully, transparently and securely in accordance with applicable data protection legislation.

DIGITAL SCALE LIMITED has appointed **Krystian Wojtas** as its **Data Protection Officer (DPO)** to oversee matters relating to data protection and privacy compliance.

If you have any questions regarding this Privacy Policy or the processing of your personal data, you may contact our Data Protection Officer using the contact details provided in **Section 12 (Contact Us)** of this Privacy Policy.

3. Categories of Personal Data We Process

The categories of personal data processed by Edu4u depend on your relationship with the Edu4u Agents CRM and the Services. We process personal data relating to different categories of individuals, including Agents, consultants, students referred to Edu4u, invitees, and individuals who communicate with us.

The categories of personal data we process may include:

Category of Personal Data	Examples
Identity Information	Full name, date of birth (where applicable), nationality, passport information, immigration status, share code, profile photograph (where provided) and other information required to support educational applications.
Contact Information	Email address, telephone number, postal address (where provided) and other contact details.
Account and Authentication Information	User account details, login credentials, encrypted authentication information, invitation status, account status, user role,

	permissions and session-related information necessary to provide secure access to the Platform.
Student Referral and Application Information	Referral records, educational history, course or institution preferences, assigned consultant, application status, enrolment status and other information relating to educational consultancy services.
Commission and Payout Information	Commission tier, commission calculations, payout information, enrolment counts and other information required to administer the Agent commission programme.
Platform Activity Information	Referral activity, application progress, account activity, quest participation, leaderboard activity, communications and other records generated through use of the Platform.
Technical and Analytics Information	IP address (where necessary), browser type, operating system, device information, pseudonymised analytics identifiers, session information, audit logs and security logs.
Communications	Correspondence, support requests, enquiries and any other information voluntarily provided when communicating with Edu4u.

The Edu4u Agents CRM is designed to minimise the collection of special category personal data. Users should not upload special category personal data unless specifically requested by Edu4u and permitted by Applicable Law.

4. How We Collect Personal Data

DIGITAL SCALE LIMITED, trading as **Edu4u**, collects personal data through the Edu4u Agents CRM from a variety of sources, depending on the nature of the services provided and the individual's relationship with Edu4u.

The categories of personal data we collect depend on how you interact with the Edu4u Agents CRM and the Services.

Source of Personal Data	Examples
Directly from Users	When Agents, consultants or administrators create an account, complete their profile, communicate with Edu4u, submit referrals, manage applications or otherwise use the Platform.
From Referring Agents	Where an Agent submits personal data relating to a prospective student as part of the educational referral and application process. Agents are responsible for ensuring they have the student's knowledge and appropriate authority before submitting the student's personal data.
From Invitees	Limited personal data, such as name, email address and invitation status, may be processed when an invitation is issued to join the Platform before an account is activated.
Automatically Through the Platform	Certain technical information is collected automatically during use of the Platform, including authentication records, session

	information, security logs, audit logs, device information and pseudonymised analytics information.
Generated Through Platform Activity	The Platform creates operational records such as referral history, application progress, commission calculations, payout records, quest activity, leaderboard information and other account activity generated during use of the Services.
From Communications	Information provided when Users contact Edu4u for support, enquiries or other communications.

Personal data may also be generated through the operation of the Platform, including account activity records, referral progress, commission records, security monitoring and other operational logs necessary for the administration, security and improvement of the Services.

5. How We Use Your Personal Data

Edu4u processes personal data only where there is a lawful basis to do so under the UK GDPR. The purposes for which we process personal data, together with the corresponding lawful bases, are set out below.

Purpose of Processing	Examples of Processing Activities	Lawful Basis (UK GDPR)
Providing the Edu4u Agents CRM and Services	Creating and managing user accounts, authenticating users, managing invitations,	Performance of a contract (Article 6(1)(b)); Legitimate Interests (Article 6(1)(f)).

	processing student referrals, tracking application progress, assigning consultants and providing platform functionality.	
Managing Agent Commissions	Calculating commission eligibility, recording enrolments, administering commission tiers and maintaining payout records.	Performance of a contract (Article 6(1)(b)); Legitimate Interests (Article 6(1)(f)).
Communicating with Users	Sending invitation emails, password reset emails, service notifications, platform updates, commission notifications and responding to enquiries or support requests.	Performance of a contract (Article 6(1)(b)); Legitimate Interests (Article 6(1)(f)).
Improving and Monitoring the Platform	Analysing platform usage, monitoring system performance, identifying technical issues, maintaining service quality and improving user experience through pseudonymised analytics.	Legitimate Interests (Article 6(1)(f)).
Protecting the Platform and Preventing Misuse	Detecting fraud, monitoring security events, investigating suspicious activity, maintaining audit logs, protecting accounts and ensuring the integrity of the Platform.	Legitimate Interests (Article 6(1)(f)); Compliance with a legal obligation (Article 6(1)(c)) where applicable.

Complying with Legal and Regulatory Obligations	Maintaining records, responding to lawful requests from regulators or public authorities, complying with data protection obligations and establishing, exercising or defending legal claims.	Compliance with a legal obligation (Article 6(1)(c)); Legitimate Interests (Article 6(1)(f)).
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Edu4u will process personal data only for the purposes for which it was collected or for other compatible purposes permitted by applicable data protection legislation.

Where we rely on our legitimate interests as the lawful basis for processing, we will ensure that those interests are balanced against your rights and freedoms and that such processing is carried out only where appropriate.

Where we rely on your consent to process personal data (for example, where required for non-essential cookies or similar technologies), you have the right to withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

6. Sharing Your Personal Data

Edu4u may share personal data where necessary to provide the Services, comply with legal obligations, protect its legitimate interests or where otherwise permitted or required by Applicable Law.

Personal data may be shared with the following categories of recipients:

Recipient Category	Purpose of Sharing
Technology and Infrastructure Providers	To host, operate, maintain and secure the Edu4u Agents CRM, including database hosting, cloud infrastructure,

	authentication services and related technical support.
Communication Service Providers	To facilitate transactional communications, including account invitations, password reset emails, application updates and other service-related notifications.
Professional Advisers	Legal advisers, accountants, auditors, insurers and other professional advisers where necessary to obtain professional advice or protect Edu4u's legal interests.
Regulatory Authorities and Public Bodies	Where disclosure is required by Applicable Law, court order, regulatory requirement or other lawful request from a competent authority.
Business Transfers	In connection with a merger, acquisition, corporate restructuring, financing transaction or sale of all or part of Edu4u's business, subject to appropriate safeguards.

Edu4u requires third-party service providers processing personal data on its behalf to implement appropriate technical and organisational measures to protect personal data and to process such data only in accordance with Edu4u's documented instructions and applicable data protection legislation.

Edu4u does not sell personal data to third parties.

7. Applicable Data Protection Laws.

Edu4u relies on different lawful bases depending on the purpose for which personal data is processed. The principal processing activities and the corresponding lawful bases are set out below.

Processing Activity	Lawful Basis	Relevant UK GDPR Provision
Creating and managing user accounts	Performance of a Contract	Article 6(1)(b)
Providing educational consultancy services	Performance of a Contract	Article 6(1)(b)
Receiving and managing student referrals submitted by authorised agents	Legitimate Interests	Article 6(1)(f)
Facilitating university applications	Performance of a Contract	Article 6(1)(b)
Administering agent commissions	Performance of a Contract	Article 6(1)(b)
Managing account communications, including invitation emails and password reset emails	Performance of a Contract	Article 6(1)(b)
Maintaining platform security, monitoring suspicious activity and preventing fraud	Legitimate Interests	Article 6(1)(f)
Maintaining business records and platform administration	Legitimate Interests	Article 6(1)(f)

Complying with legal and regulatory obligations	Legal Obligation	Article 6(1)(c)
Establishing, exercising or defending legal claims	Legitimate Interests	Article 6(1)(f)
Operating essential authentication and security technologies	Legitimate Interests	Article 6(1)(f)
Processing analytics and usage information (where applicable)	Subject to the applicable requirements of the UK GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR").	

Where Edu4u relies on its legitimate interests as the lawful basis for processing, it has undertaken an assessment to ensure that such interests are balanced against the rights and freedoms of the individuals concerned.

Where Edu4u relies on the performance of a contract, the processing is necessary to provide the services requested by the individual or to fulfil Edu4u's contractual obligations.

Where Edu4u processes personal data to comply with a legal obligation, such processing is limited to what is necessary to satisfy the applicable legal or regulatory requirement.

Where processing is subject to the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR"), Edu4u will ensure that the applicable requirements of PECR are complied with in addition to the UK GDPR.

8. International Transfers of Personal Data

Edu4u primarily stores and processes personal data within the **United Kingdom**. Edu4u's primary database is hosted within the United Kingdom.

In the course of providing the Services, Edu4u may engage third-party service providers that support the operation of the Edu4u Agents CRM, including providers of cloud infrastructure, communications, authentication, security and other technology services. Some of these providers may process personal data outside the United Kingdom.

Where personal data is transferred outside the United Kingdom, Edu4u will ensure that such transfers are carried out in accordance with Chapter V of the UK GDPR and all other applicable data protection legislation.

Where required, Edu4u will implement appropriate safeguards to protect personal data, which may include:

- adequacy regulations recognised under UK law;
- the International Data Transfer Agreement (IDTA);
- the UK Addendum to the European Commission's Standard Contractual Clauses; or
- any other lawful transfer mechanism recognised under applicable data protection legislation.

Edu4u takes reasonable steps to ensure that any third-party service provider processing personal data on its behalf maintains appropriate technical and organisational measures to protect that data and processes it only in accordance with applicable contractual and legal obligations.

9. Data Retention

Edu4u retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including providing the Services, complying with legal and regulatory obligations, resolving disputes, maintaining appropriate business records and enforcing legal rights.

The retention period applicable to personal data depends on the nature of the information and the purpose for which it is processed.

Category of Personal Data	Retention Approach
Agent Account Information	Retained while the account remains active and thereafter only for as long as

	necessary to comply with legal, regulatory and operational requirements.
Student Referral and Application Records	Retained for the duration necessary to manage educational consultancy services, application processes and associated legal or contractual obligations.
Commission and Payout Information	Retained for accounting, financial reporting and audit purposes in accordance with applicable legal requirements.
Communications and Support Records	Retained only for as long as reasonably necessary to respond to enquiries, resolve disputes and maintain appropriate business records.
Technical Logs and Security Records	Retained for limited periods necessary to maintain platform security, investigate incidents, monitor system performance and comply with applicable legal obligations.
Analytics Information	Analytics information is retained for 90 days , after which it is securely deleted or anonymised where appropriate, unless a longer retention period is required by Applicable Law.

Where personal data is no longer required, Edu4u will securely delete, anonymise or otherwise dispose of it unless continued retention is required or permitted by Applicable Law.

Where personal data has been deleted from active systems, residual copies may remain in secure backup systems for a limited period before being permanently overwritten in accordance with Edu4u's backup and disaster recovery procedures.

10. Security Measures

Edu4u implements appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

These measures are designed having regard to the nature of the personal data processed, the risks presented by the processing activities and the requirements of applicable data protection legislation.

The security measures implemented by Edu4u include, where appropriate:

Security Measure	Description
Access Controls	Access to the Edu4u Agents CRM is restricted according to user roles and permissions to ensure that authorised users can access only the personal data necessary to perform their duties.
Authentication Measures	Secure authentication procedures, account verification mechanisms, password management processes and session controls are implemented to help protect user accounts from unauthorised access.
Encryption	Appropriate encryption and secure communication protocols are used to protect personal data during transmission and storage, where applicable.
Security Monitoring and Audit Logging	Security monitoring, audit logging and administrative alerting processes are maintained to detect, investigate and

	respond to suspicious or unauthorised activity affecting the Platform.
Infrastructure Security	Appropriate technical and organisational safeguards are implemented to protect the availability, integrity and confidentiality of the Platform and the personal data processed through it.
Backup and Recovery	Secure backup and recovery procedures are maintained to support business continuity and assist in restoring system availability following an operational incident.

Where Edu4u engages third-party service providers to support the operation of the Platform, reasonable steps are taken to ensure that such providers maintain appropriate technical and organisational security measures and process personal data in accordance with applicable data protection legislation.

Despite these measures, no method of electronic transmission or storage can be guaranteed to be completely secure. Edu4u continually reviews and updates its security measures to address evolving risks, technological developments and legal requirements.

11. Your Rights Under Data Protection Law

Under the United Kingdom General Data Protection Regulation (“UK GDPR”), individuals whose personal data is processed by Edu4u have a number of rights in relation to that personal data, subject to certain conditions and limitations prescribed by law.

These rights include:

Your Right	Description
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The Right to Be Informed	The right to receive clear and transparent information about how Edu4u collects, uses, stores and protects personal data. This Privacy Policy forms part of Edu4u's commitment to fulfilling that obligation.
The Right of Access	The right to request confirmation as to whether Edu4u processes personal data and, where applicable, to obtain a copy of that personal data.
The Right to Rectification	The right to request the correction of inaccurate or incomplete personal data held by Edu4u.
The Right to Erasure	The right to request the deletion of personal data where one of the grounds for erasure under the UK GDPR applies. This right is not absolute and may be restricted where Edu4u is required to retain personal data to comply with legal obligations or establish, exercise or defend legal claims.
The Right to Restrict Processing	The right to request that Edu4u restrict the processing of personal data in certain circumstances prescribed by law.
The Right to Data Portability	The right to receive personal data in a structured, commonly used and machine-readable format and, where technically feasible, to have that data transmitted to another data controller.
The Right to Object	The right to object to the processing of personal data where such processing is based on Edu4u's legitimate interests or

	relates to direct marketing, subject to applicable legal exceptions.
Rights in Relation to Automated Decision-Making	The right not to be subject to a decision based solely on automated processing, including profiling, where that decision produces legal or similarly significant effects. Edu4u does not currently make decisions of this nature solely through automated processing.

Individuals who wish to exercise any of the rights described above may contact Edu4u using the contact details provided in Section 13 of this Privacy Policy.

Edu4u will respond to requests relating to personal data in accordance with the requirements of the UK GDPR. Where appropriate, Edu4u may request additional information to verify an individual's identity before responding to such requests.

Where Edu4u is unable to comply with a request, it will explain the reasons for its decision and, where applicable, inform the individual of their right to lodge a complaint with the Information Commissioner's Office ("ICO").

12. Contact Us

If you have any questions about this Privacy Policy, the way Edu4u processes your personal data, or if you wish to exercise any of your rights under applicable data protection legislation, you may contact our **Data Protection Officer** using the details below:

Data Protection Officer
Krystian Wojtas
Email: director@whatcollege.uk

We will endeavour to respond to all legitimate enquiries and requests within the timeframes required by applicable data protection legislation.

13. Complaints

Edu4u is committed to resolving any concerns regarding the processing of personal data fairly, promptly and transparently.

If you have any concerns about the way Edu4u has handled your personal data, you are encouraged to contact Edu4u first using the contact details provided in Section 12 of this Privacy Policy. Edu4u will endeavour to investigate and resolve your concerns as quickly as reasonably practicable.

If you remain dissatisfied with Edu4u's response, or you believe that your personal data has been processed in a manner that does not comply with applicable data protection legislation, you have the right to lodge a complaint with the Information Commissioner's Office ("ICO"), the United Kingdom's independent supervisory authority for data protection matters.

Lodging a complaint with the ICO does not affect any other legal rights or remedies that may be available to you under applicable law.

14. Changes to This Privacy Policy

Edu4u may amend or update this Privacy Policy from time to time to reflect changes in its business operations, the services it provides, applicable legal or regulatory requirements, or developments in data protection law.

Where material changes are made to this Privacy Policy, Edu4u will take reasonable steps to notify affected individuals where appropriate and, where required by law, obtain any necessary consent before such changes take effect.

The most recent version of this Privacy Policy will always be made available through the Edu4u Agents CRM and will take effect from the date specified at the beginning of the Privacy Policy.

Individuals are encouraged to review this Privacy Policy periodically to remain informed about how Edu4u collects, uses, shares and protects personal data.