

Critical Thinking Mentor

criticalthinkingmentor.com

HOLDING VERSION — INTERIM USE ONLY

Pending bespoke replacement by instructed solicitor

Website Privacy Policy

For visitors to criticalthinkingmentor.com and users of the contact form

Version 0.9 — published 18/05/2026

1. Scope of This Policy

This Privacy Policy applies to your visit to the criticalthinkingmentor.com website and to any contact you make with Critical Thinking Mentor through the website's contact form or by direct email.

The website is purely informational. It exists to describe the practice's seven programmes, the Founding Mentor's background, the engagement process, and the relevant policies — and to provide a means by which prospective families may make first contact. The website does not host an account area, does not transact, does not deliver sessions, and does not host session content. It is the entry point to the practice, not the practice itself.

If you go on to engage the practice

A separate, more detailed Privacy Policy governs engaged clients. That policy covers the personal data of the mentee, the records of mentoring delivered, the recordings of sessions held for safeguarding purposes, the mentor reports, and the longer retention periods that apply to engaged-client data. The full Privacy Policy is provided to families alongside the Online Mentoring Agreement at the point of engagement. This shorter document covers only the website and the initial enquiry.

2. Who We Are

We are Critical Thinking Mentor — a UK sole-trader academic mentoring practice operated by Stephen Rathbone, trading as criticalthinkingmentor.com. We are registered with HMRC in the United Kingdom as a sole trader and with the UK Information Commissioner's Office as a data controller (ICO Registration Number: ZC133858).

For the purposes of UK GDPR and EU GDPR, Stephen Rathbone is the data controller of any personal data submitted through this website. There is no Data Protection Officer; none is required for a sole-trader practice of this scale. Enquiries about data protection should be directed to the Founding Mentor at the email address given at section 11 below.

3. What Personal Data We Collect

The website collects personal data from you in three situations only:

3.1 When you submit the contact form

The website's contact form, hosted via Wix Forms, collects four items of personal data:

- Your first name
- Your last name
- Your email address
- Your country of origin (or country of residence)

No other fields are required, and the form does not collect any other personal data. We do not request the name or age of any prospective mentee, any school or institutional affiliation, any telephone number, any postal address, or any other personal data through the form. If you choose to include additional information in any free-text portion of the form, that information is treated as personal data and held under this policy.

3.2 When you correspond with us by email

Email correspondence following a form submission, or sent directly to the practice's email address ahead of any form submission, is treated as personal data. We will hold the substantive content of any email you send us, and our replies, in the email account from which we operate the practice (ProtonMail, Switzerland — see section 6.2).

3.3 When you interact with the cookie banner

When you arrive at the website, the CookieYes Consent Management Platform displays a cookie banner asking you to accept, reject, or customise cookie preferences. Your choice, the time it was made, your approximate location (derived from your IP address), and a unique consent identifier are recorded in the CookieYes consent log. This log is held by CookieYes as a sub-processor on our behalf (see section 6.3) and provides the audit trail required under UK GDPR and equivalent regulations.

3.4 What we do not collect

The website does not collect, and we do not knowingly receive, any of the following through the website itself:

- Analytics data of any kind. Wix Analytics is not enabled. Google Analytics, Facebook Pixel, LinkedIn Insight Tag, TikTok Pixel and equivalent third-party analytics or advertising tools are not in use.
- Special-category personal data (data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation). If, in the course of correspondence, you choose to share information about a prospective mentee, or to disclose any special-category data, you do so voluntarily and we treat any such information as confidential and process it under this policy.

- Information about minors. The website is intended for parents and legal guardians of young people aged 10 to 21. While young adults aged 18 to 21 may legitimately submit the form on their own behalf, the website is not designed for use by children and we do not knowingly process the personal data of any individual under 18 through the website.
- Financial information of any kind. No payments are taken through the website.
- Identifying documents (passports, ID cards, school transcripts, etc.) of any kind.

4. The Lawful Basis for Processing

Under UK GDPR (and EU GDPR for EU/EEA-resident data subjects), we must have a lawful basis for processing your personal data. The lawful bases that apply to the website are:

4.1 Legitimate interests (UK GDPR Article 6(1)(f))

Our legitimate interests in responding to enquiries from prospective families and in conducting initial correspondence with them about possible engagement are the principal lawful basis for processing data submitted through the contact form and through subsequent email. We have considered, and continue to consider, whether these interests are overridden by your interests, rights or freedoms; we have concluded that they are not, because the data we process is minimal, the processing is what you would reasonably expect when submitting an enquiry, and you remain free to discontinue contact at any time.

4.2 Consent (UK GDPR Article 6(1)(a))

Your consent supports the placement of any non-essential cookies (see section 7) — given via the CookieYes banner — and the storage of your consent choices in the CookieYes consent log. Consent given via the banner can be withdrawn at any time through the persistent consent-revisit mechanism described in section 7.4.

If you provide additional information voluntarily in the contact form or in correspondence, the processing of that additional information rests on your having chosen to provide it (consent), as well as on our legitimate interests in responding to your enquiry.

5. What We Do With Your Personal Data

The personal data you submit through the website is used for the following purposes, and no others:

- To respond to your enquiry, by email.
- To schedule a free thirty-minute introductory consultation by video, if you and we agree that one would be useful.
- To maintain a small administrative record of enquiries received, so that we can recognise prior correspondence if you return to us at a later point.
- To honour your cookie-consent choices on subsequent visits — the CookieYes consent record is used for this purpose.

We do not use the personal data submitted through the website for any of the following:

- Marketing communications — we do not send newsletters, programme updates, or broadcast emails. All correspondence with you is direct, personal, and arises from your enquiry.
- Sale or sharing — we do not sell, rent, or otherwise share your personal data with any third party for commercial purposes.
- Individual profiling or automated decision-making — we do not profile individual visitors, build behavioural profiles of named people, or make any automated decisions about you based on your data. We do not aggregate analytics on website use; Wix Analytics is not enabled.
- Training of artificial intelligence systems — we do not feed any personal data submitted to us into any AI tool, do not use it to train any model, and do not feed your correspondence to consumer AI services for any purpose. All responses to your correspondence are written personally by the Founding Mentor.

6. Sub-processors — Who Else Holds Your Data

Four third parties process personal data on our behalf in connection with the website. We have Data Processing Agreements in place (or pending finalisation) with each.

6.1 Wix (United States / European data centres)

The website is hosted on the Wix platform, and the contact form is implemented using Wix Forms. When you submit the contact form, the data passes through Wix's infrastructure before reaching us. Wix is the website hosting and contact-form provider. Wix's own privacy practices are governed by the Wix Privacy Policy, available at [wix.com](https://wix.com/privacy). Wix operates from the United States with European data-centre facilities; we rely on the appropriate transfer safeguards under UK GDPR for the transfer of personal data to Wix.

6.2 ProtonMail and Proton Drive (Switzerland)

Our primary email correspondence with you is conducted via ProtonMail (end-to-end encrypted, Switzerland-based). Any working files arising from correspondence are stored on Proton Drive (also end-to-end encrypted, Switzerland-based). Switzerland has a UK adequacy decision in place, which means that the transfer of personal data to Switzerland requires no additional safeguards beyond our Data Processing Agreement with Proton.

6.3 CookieYes (consent management platform)

CookieYes is the third-party Consent Management Platform installed on the website. CookieYes provides the cookie banner that visitors see on arrival, the preference centre that allows category-by-category consent, and the consent log that records each consent event (consent ID, country, timestamp, and the choices made). CookieYes processes this consent log on its own infrastructure, as a sub-processor on our behalf. CookieYes's own privacy practices are governed by the CookieYes Privacy Policy, available at cookieyes.com.

6.4 Microsoft Teams (when you proceed to a consultation)

If we agree to a free introductory consultation by video, the consultation is conducted on Microsoft Teams. Microsoft Teams is operated by Microsoft Corporation. We have the relevant Microsoft Data Processing Agreement in place. The Microsoft privacy practices and the relevant Standard Contractual Clauses for international transfers are governed by Microsoft's own publications. Introductory consultations are not recorded.

7. Cookies and Similar Technologies

The website uses the minimum number of cookies. The consent management platform CookieYes governs which cookies are placed on your device and when. The Cookie Policy section below explains what is in use and how to manage your preferences.

7.1 The cookie categories

CookieYes categorises cookies into six standard categories. The position for our website, by category, is as follows:

- Necessary — a small number of essential cookies used to make the website function properly. These cookies are necessary for the website to work (for example, to remember your cookie-banner choice from a previous visit, and to support basic site functions) and do not require your consent under UK regulations (PECR) because they are strictly necessary.
- Functional — none currently in use.
- Analytics — none currently in use. Wix Analytics is not enabled. Google Analytics is not in use.
- Performance — none currently in use.
- Advertisement — none currently in use. No advertising, retargeting, or marketing cookies are placed.
- Others — none currently in use.

7.2 The cookie banner experience

On your first arrival at the website, the CookieYes banner is displayed. Until you make a choice, no non-essential cookies are placed. The banner offers three options:

- Accept All — you accept all cookies, including those in any category we may enable in future.
- Reject All (or 'Decline') — you reject all non-essential cookies. The website remains fully usable; nothing about your visit is impaired.
- Customise — you open the CookieYes preference centre and choose category-by-category.

Because the practice currently has no cookies in the Functional, Analytics, Performance, Advertisement, or Others categories, the practical effect of Accept All and Reject All is the same at the time of publication. The banner is in place to support compliance and to allow honest disclosure of the position; it also provides the framework for any future change.

7.3 The CookieYes consent log

When you interact with the cookie banner, CookieYes records your choice in a consent log. The log includes a unique consent identifier, your approximate location (derived from IP address), the date and time of your choice, and the choices made (per category). The log is held by CookieYes on its own infrastructure and is used to demonstrate compliance with UK GDPR and equivalent regulations in the event of regulatory enquiry or audit. CookieYes is named as a sub-processor at section 6.3 above.

7.4 How to manage or withdraw your cookie preferences

You can review or change your cookie preferences at any time by clicking the cookie-preferences icon in the footer of the website (provided by CookieYes), which reopens the preference centre. You can also clear cookies in your browser and revisit the website, which will cause the CookieYes banner to be displayed again.

7.5 What we do not use

To be clear, we do not use any of the following:

- Wix Analytics, Wix Chat, Wix tracking integrations of any kind.
- Google Analytics, Google Tag Manager, Google Consent Mode v2, or any other Google service on the website.
- Facebook Pixel, LinkedIn Insight Tag, TikTok Pixel, or any social-media advertising tracking.
- The IAB Transparency and Consent Framework (TCF) — not relevant as we do not engage in programmatic advertising.
- Retargeting or remarketing cookies of any kind.
- Session recording or screen-replay tools (CookieYes supports geo-targeted banners; session replay and other invasive tools are not in use).
- Live chat tools.
- Fingerprinting techniques designed to identify visitors without cookies.

8. How Long We Keep Your Data

We keep personal data submitted through the website only for as long as is necessary for the purpose for which it was collected.

8.1 Enquiry-only data (no engagement follows)

If you submit the contact form or correspond with us by email, but you do not go on to engage the practice, we retain your personal data for twelve months from the date of last contact, after which it is deleted. This twelve-month period allows us to recognise your contact if you return to us within a reasonable period; it is not retained indefinitely.

8.2 If you go on to engage the practice

If, following correspondence, you engage the practice — that is, you complete the Parental Consent Form and the Online Mentoring Agreement is executed — your personal data passes from the scope of this website Privacy Policy into the scope of the engaged-client Privacy Policy. That separate policy specifies longer retention periods appropriate to the contractual relationship, the safeguarding regime, and the practice's record-keeping obligations.

8.3 Email correspondence

Email correspondence is held in the practice's ProtonMail account for the same twelve-month period for enquiry-only contact, and for the periods specified in the engaged-client Privacy Policy if engagement follows.

8.4 CookieYes consent log

CookieYes retains consent log entries according to its own data retention policies, which are governed by the CookieYes Privacy Policy. We do not directly control CookieYes's retention periods. If you wish to exercise your data-subject rights in respect of your consent log entry — for example, to request deletion of the consent record associated with your visit — please email us; we will work with CookieYes to honour the request.

9. Your Rights

Under UK GDPR (and EU GDPR for EU/EEA residents), you have the following rights in relation to personal data we hold about you:

- The right to be informed about how your data is processed (the purpose of this policy).
- The right of access — you may ask us for a copy of the personal data we hold about you, free of charge, within one month of your request.
- The right to rectification — if the data we hold about you is inaccurate or incomplete, you may ask us to correct it.
- The right to erasure ('the right to be forgotten') — you may ask us to delete the personal data we hold about you, subject to limited exceptions (for example, where retention is required to comply with a legal obligation).
- The right to restrict processing — you may ask us to limit the way we use your data.
- The right to data portability — you may ask us to provide the data we hold about you in a structured, commonly-used format.
- The right to object — you may object to our processing of your data on the basis of legitimate interests.
- The right to withdraw consent — where processing is based on your consent, you may withdraw that consent at any time. For cookies, this is done via the CookieYes preference centre (see section 7.4).
- The right to lodge a complaint with the supervisory authority — see section 10 below.

To exercise any of these rights, please email the Founding Mentor at the address given at section 11. We respond to most subject access requests within seven working days, and in any case within the one-month statutory limit.

9.1 Specific rights for California residents

If you are a resident of California, additional rights apply under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA). These include the right to know what personal information is collected, the right to delete personal information, the right to correct inaccurate personal information, and the right to opt out of the sale or sharing of personal information. We do not sell or share personal information for cross-context behavioural advertising. A 'Do Not Sell or Share My Personal Information' link is provided in the website footer as a courtesy.

9.2 Other US states and jurisdictions

If you are a resident of Virginia, Colorado, Connecticut, Utah, Texas, Florida, or another US state with consumer privacy legislation, equivalent rights may apply to you. We honour these rights in substantively the same way as we honour UK GDPR rights. Equivalent rights under Canadian (PIPEDA), Australian, Singaporean (PDPA), and other comparable frameworks are similarly honoured. If you wish to exercise any specific right, please email us.

10. Complaints

If you are unhappy with how we have handled your personal data, please email the Founding Mentor in the first instance. We take complaints seriously and will respond promptly.

If, after our response, you remain unhappy, you have the right to lodge a complaint with the supervisory authority appropriate to your jurisdiction.

- In the United Kingdom: the Information Commissioner's Office (ICO), at ico.org.uk.
- In the European Union or European Economic Area: your local national data protection authority.
- In California: the California Privacy Protection Agency, at coppa.ca.gov.
- In other US states with relevant legislation: the office of the State Attorney General.

11. Contact and Changes to This Policy

11.1 How to contact us

For any matter relating to this Privacy Policy, please email the Founding Mentor at criticalthinkingmentor@pm.me. We aim to respond within seven working days.

11.2 Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practice, in third-party services we use, or in applicable law. When we do, we will update the version number and the date at the top of the document and post the revised policy on the website.

If we make a material change — that is, a change that affects how your personal data is processed in a way that would be relevant to you — we will, where possible, draw your attention to the change before it takes effect, including by re-displaying the CookieYes banner where cookie-related changes apply.

Note specifically: this Policy is a holding version (Version 0.9). A bespoke, solicitor-drafted version will replace it in due course. The replacement is not expected to change the operational substance of our position; it is intended to add legal precision and to incorporate any matters identified by counsel during their drafting work.

11.3 Governing law and jurisdiction

This Privacy Policy is governed by the laws of England and Wales. Any dispute arising under or in connection with this policy is subject to the exclusive jurisdiction of the courts of England and Wales, save where applicable consumer law in your jurisdiction provides otherwise.

In summary

This website is purely informational. The contact form collects four items of personal data (first name, last name, email, country); any subsequent email is held in our ProtonMail account. CookieYes manages cookie consent on the website; the cookie banner blocks all non-essential cookies until you give consent, and at the time of publication the practice has no cookies in any non-essential category (no analytics, no advertising, no tracking). We use the data only to respond to enquiries. We do not market, do not sell or share, do not profile individuals, and do not feed your data to AI tools. We retain enquiry-only data for twelve months. You have full rights of access, correction, deletion, and complaint, and we honour them. If you engage the practice, a more detailed Privacy Policy governing engaged-client data is provided to you with the Online Mentoring Agreement.

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