

GDPR
2021/22

PRIVACY POLICY: GDPR

DATA PRIVACY NOTICE FOR STUDENTS / CLIENTS



The Language Training co. Dorset

BRANDON & CLIFTON HOUSE, ST PETER'S RD, BOURNEMOUTH BH1 2LT | 01202 772030

Introduction

The Language Training Co. Dorset. ("We") are committed to protecting and respecting your privacy. This policy together with our terms and conditions, and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The rules on processing of personal data are set out in the General Data Protection Regulation (GDPR).

Definitions

Data Controller – A controller determines the purposes and means of processing personal data.

Data Processor – A processor is responsible for processing personal data on behalf of a controller.

Data Subject – Natural person (student, host families, service providers, suppliers, etc.)

Personal Data – The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special Categories of Personal Data – The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data, where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Data Processing – It means any operation or set of operations which are performed on personal data or on sets of personal data, whether or not by automated means such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Third Party – It means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

About Us

The Language Training Co is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are:

44-46 St Peters Road, Bournemouth, Dorset, BH1 2LT, United Kingdom

www.thelanguagetrainingco.co.uk

info@thelanguagetrainingco.co.uk

For all data matters contact info@thelanguagetrainingco.co.uk

Collection, use and disclosure of personal data

We collect and process data for the following reasons:

- personal data collected and created in relation to the provision of English and Foreign Language courses to individuals and groups; and
- Personal data relating to accommodation providers for our students; and
- personal data relating to people who have asked to receive our newsletters and other information services or marketing materials.

All of our people are required to abide by our Privacy Policy when handling personal data and are provided with appropriate data protection training. Any breach of data protection will be taken seriously and may result in disciplinary action. Our Data Protection Manager will provide the advice and guidance to our people on data protection issues, as is required.

A. Provision of English language courses and/or accommodation services

A1. Collection of personal data

Our lawful basis for processing your general personal data is legitimate interests. We will collect personal information which may include the following:

- Personal information such as full name, address, telephone number, date of birth, passport, or visa information, next of kin contact details, email address, photograph for student card, unique student number, ...
- Dietary preferences and/or requirements
- Emergency contact information (names, phone numbers, email addresses)
- Medical information, which is relevant
- Special education needs information
- Characteristics such as mother tongue, nationality, country of birth
- Information required for certificates, quality assurance purposes, safeguarding and accreditation compliance purposes, such as sessions attended, number of absences and absence reasons
- Travel information
- Bank information where required

A2. Use of Personal Data

We will use this personal data in the provision of our services, including for the necessary administration of a course and/or accommodation booking. Whilst the majority of student information provided to us is mandatory, some of it is provided to us on a voluntary basis.

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To support student learning
- To adhere to safeguarding policies and procedures
- To monitor and report on student progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To provide services and fulfil our contracts
- To comply with the law regarding data sharing
- To be able to supply visa documentation where relevant
- To be able to contact you regarding your booking
- To be able to contact you while you are studying with us
- To make sure you are studying on an age and level appropriate course
- To be able to access relevant medical data where relevant while you are staying with us
- To be able to contact your next of kin in case of emergency

A3. Sharing personal data

Your personal data will be treated as strictly confidential, and will be shared only with:

- Inspectorate bodies including The British Council, ISI (Independent Schools Inspectorate).
- Professional bodies of which The Language Training Co is a member.
- UK Visas and Immigration upon request.
- Educational Tour Organisers and Educational Consultants who work with LTC to send students to the school.
- Host families/Self-Catering accommodation providers.
- Accommodation providers (host families and/or residences).
- Taxi and/or “meet and greet” companies who provide student airport transfer services.
- Photos of students taken at social programme events and at school may be shared on social media sites.

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We are required to share student information for routine inspections by bodies such as The British Council or UK Visas and Immigration as referenced in the list above (who we share student information with). We are also required to share student information for safeguarding purposes, when necessary, for example if there is a welfare issue that would require the police to be involved. We also share student information with the Educational Tour Organisers or Educational Consultants who may have sent us the student information originally in order to enrol the student in the school.

We share student information with professional bodies such as English UK to develop best practice within our industry.

If students request that the school makes accommodation arrangements on their behalf as part of their enrolment with the school, we will share student information with the host family/self-catering accommodation providers. Please see our Accommodation Provider Privacy Policy for more details about this.

The Language Training Co. Dorset. uses student photos, country statistics and age groups to market the school to other prospective students. We do not share any other student information with third parties. The school is marketed through our website, social media and a brochure which is produced in house by the school. The brochure is available on our website for public access and download. This brochure is also shared with Educational Tour Organisers and Educational Consultants who work with The Language Training Co. Dorset to recruit students for the school, as well as members of the general public who request a copy either in person (by coming into the school building to make an enquiry) or via email or telephone enquiry. This brochure may include photos of students.

Student's photos are only used in this way after we have obtained direct consent from the student before taking the photos, and as per data compliance laws, should the student request that we no longer use this photo all reasonable steps will be taken to adhere to this request. The Language Training Co. Dorset. never shares student information for marketing purposes with third party marketing companies.

A4. Personal Data Retention Period

We will keep personal data only for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Normally, our retention period for personal data collected for this purpose is a minimum of 12 months after the end of the period that we are providing services or support.

We hold student data on a passworded database and on our network servers, which only necessary and approved members of the school staff have access to. After twelve months, we will delete any sensitive data held on the system relating to the student. After that, we keep records only of the names, dates of attendance, achieved certificates and student nationality on our database to form the basis of figures for quality development planning within the school and in case students contact us in the future to obtain a copy of their certificates. Any data that is recorded on paper at any time during the registration process is securely shredded when the data has been inputted onto the database.

B. Personal Data from Accommodation Providers

B1. Collection of Personal Data relating to Accommodation Providers for our students

Our lawful basis for collecting and processing your general personal data is legitimate interests. We will collect personal information which may include the following:

- Personal information (such as name, date of birth, email addresses, phone numbers, address, and passport information)

- Characteristics (such as language, nationality, occupation, hobbies and interests, details of children or partners)
- Relevant medical information
- Bank details

B2. Use of Personal Data from Accommodation Providers

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- to place students with the best possible accommodation that matches their needs and preferences
- to adhere to safeguarding policies and procedures
- to provide appropriate pastoral care

Whilst the majority of accommodation provider information collected is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain accommodation provider information to us or if you have a choice in this.

B3. Sharing Personal Data from Accommodation Providers

We may share accommodation provider information with:

- Students who will be placed with the accommodation provider
- Educational Tour Organisers and Educational Consultants who work with The Language Training Co. Dorset to recruit students for the school
- Inspectorate bodies including The British Council
- Professional bodies of which The Language Training Co. Dorset is a member
- UK Visas and Immigration upon request
- Taxi/meet and greet companies who provide student airport transfer services. We do not share information about our accommodation providers with anyone without consent unless the law and our policies allow us to do so.

We are required to share accommodation provider information for routine inspections by organisations such as The British Council or UK Visas and Immigration as referenced in the list above (who we share student information with). We are also required to share accommodation provider information for safeguarding purposes, when necessary, for example if there is a welfare issue that would require the police to be involved.

We also share accommodation provider information with the Educational Tour Organisers or Educational Consultants who may have sent us the student information originally in order to book accommodation for the student as part of their course with The Language Training Co. Dorset. We share accommodation provider information with professional organisations such as English UK to develop best practice within our industry.

We share accommodation provider information directly with students of the school who will be placed with the accommodation provider during their course at The Language Training Co. Dorset. The Language

Training Co. Dorset. is marketed through our website and through a brochure which is produced in house by the school. The brochure is available on our website for public access and download. This brochure is also shared with Educational Tour Organisers and Educational

Consultants who work with The Language Training co Ltd to recruit students for the school, as well as members of the general public who request a copy either in person (by coming into the school building to make an enquiry) or via email or telephone enquiry. This brochure includes some photos of the homes of accommodation providers and its occupants. Accommodation provider photos are only used in this way after we have obtained direct consent and made a private agreement with the accommodation provider before taking the photos, and as per data compliance laws, should the accommodation provider request that we no longer use this photo all reasonable steps will be taken to adhere to this request.

The Language Training co Ltd never shares accommodation provider information for marketing purposes with third party marketing companies.

B4. Data Retention Period (Accommodation)

We hold accommodation provider data for as long as we have an active working relationship with them. This data is stored on a secure database and in electronic folders on our network servers with access by approved members of the school staff.

When the school no longer works with the accommodation provider, this data is deleted after a period of two years. Any data that is stored on paper is kept within a locked cupboard in a secure office and is securely shredded when the data is no longer needed.

C. Personal Data for Marketing Purposes

C1. Collection of Personal Data for Marketing Purposes

Our lawful basis for collecting and processing your general personal data for the purpose of receiving our Marketing Information is that you have given your consent. We will collect information such as name, email address, phone number, IP address (or similar unique identifiers) together with the additional information that you provide to us. We may collect this information from you (whether directly or via automated means such as our website).

We will collect personal data in our CRM when you tell us that you wish to receive all or part of our Marketing Information, or otherwise give us your personal details. You may at any time tell us that you wish to stop receiving our Marketing Information.

C2. Use of Personal Data (Marketing)

Personal data will be used to provide you with the marketing information that you ask for, or that we think are relevant to the preferences that you may have given us. We may analyse what areas of information are of interest to you so that we can better target the Information that we provide. We will only use your personal data when the law allows us to and with your consent.

C3. Sharing Personal Data (Marketing)

We may share personal data with third parties in respect of the provision of our marketing information, including third parties who provide services to us (IT, website hosting, email delivery and other services). In respect of all disclosures of personal data, we will only share the personal information which is necessary for the particular purpose for which it is provided, or where we have another legitimate interest in doing so, and we will ensure that the personal data is appropriately protected.

C4. Data Retention Period (Marketing)

We will keep personal data only for as long as is necessary to fulfil the purposes for which we collected it. Any personal data that we have from you solely for the purposes of your receiving our information will not be used once you have asked us to stop providing these to you (except to the extent that it is necessary to stop you receiving the Information).

Where we store your personal data

We principally store data, both electronically and on file, at our offices, with archive storage for files locally. Personal data may be transferred outside of the UK by processors acting on our behalf. For transfers to countries not considered adequate by the ICO, we will ensure that personal data is adequately protected, as required by the GDPR.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate and/or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

D. Automated decision making

We do not use any form of automated decision making in our business.

E. Cookies Policy

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files stored on your computer or mobile device when you browse websites. Our cookies also provide us with aggregated information about how visitors interact with our website.

Our cookies help us:

- ✦ Make our website work as you would expect
- ✦ Improve the speed and security of our site
- ✦ Continuously improve the website for you
- ✦ Improve the quality of the information we provide you

We do not use cookies to collect any personally identifiable information about you (without your express permission), nor to pass any personally identifiable data to third parties. We do not pass personal data collected via cookies to advertising networks. The expiry of persistent cookies set by our website is 2 years. Session cookies expire when you stop browsing our website.

Permission to use cookies

If the settings on your browser are adjusted to accept cookies, we take this, and your continued use of our website, to mean that you consent. Should you wish to remove or not use cookies from our site, you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

Anonymous visitor statistics cookies

We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g., Mac or Windows) which helps to identify when our site isn't working as it should for particular technologies as well as how long visitors spend on the site and what pages they look at. This helps us to continuously improve our website. These so call "analytics" programs also tell us, on an anonymous basis, how people reached this site (e.g., from a search engine) and whether they have been here before. We use Google Analytics. You can find out more about their privacy policy and security here (<http://www.google.com/analytics/learn/privacy.html>). To opt out of being tracked by Google Analytics across all websites visit here (<https://tools.google.com/dlpage/gaoptout>).

Turning cookies off

You can usually switch most cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so however will likely limit the functionality of our and a large proportion of other websites, as cookies are a standard part of most modern websites. To find out more about cookies, including how to see what cookies have been stored and how to manage and delete them, visit <http://www.allaboutcookies.org/>

F. Links from our website

Our website may, from time to time, contain links to and from the websites of third parties that we permit to make such links. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. We recommend that you check these policies before you submit any personal data to these websites.

G. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

H. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

I. How to make a complaint

To exercise all relevant rights, queries, or complaints please in the first instance contact our data representative on **info@thelanguagetrainingco.co.uk**. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.