# English UK privacy policy

# Last updated 31 May 2019

We take your right to privacy very seriously and respect any personal data you share with us. We have appropriate security measures in place to ensure we keep your data safe. This privacy policy is intended to give you an understanding of how and why we use the information that you give us. We do not share this data with third parties for marketing purposes.

We review this policy regularly and will update it from time to time. When it is updated any changes will be published here.

# 1- Who we are

English UK trades as English UK Ltd, the membership and charitable arm, and English UK Enterprises Ltd, the commercial arm, hereafter referred to as 'we', 'us' and 'our'.

English UK Ltd is a company registered in England and Wales with company number 5120951 and a charity registered in England and Wales with charity number 1108792, whose registered office is 47 Brunswick Court, Tanner Street, London, SE1 3LH.

English UK Enterprises Ltd is a company registered in England and Wales with company number 5200973 whose registered office is 47 Brunswick Court, Tanner Street, London, SE1 3LH. English UK Enterprises Ltd organises StudyWorld London.

When you join us, use our websites and social media pages or when registering for any of our events, training or services, you are consenting to this privacy policy and the ways in which we use your personal data as outlined in this policy.

If you do not agree with this policy then please do not provide us with your information or continue using our websites and social media pages.

# 2- What is Personal data?

Personal data is defined by the General Data Protection Regulations as:

"any information relating to an identified or identifiable natural person ('data subject'); 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".

English UK is a membership organisation and the majority of the personal data we hold has been specifically provided to us by representatives of our member organisations, or by members of staff of other education providers who attend our events, training or subscribe to our services.



# 3- Legal bases for processing your data

We use different legal bases for processing data that you provide us:

- i. Contract when you join English UK membership or register for our events and services
- ii. Legitimate interest where you have previously used our services or attended our events and training, or where you are an accredited centre that is not in English UK membership, or are involved in international education
- iii. Consent where any processing or secondary processing of your personal data is shared with third parties or where you agree to the specific use of your personal data as per the terms and conditions of the event, training or other service you are registering for.

#### 4- Personal data we collect, why we collect it and who we share it with

#### Members, partners and participants

We collect personal data as set out below for staff at educational institutions, service providers and partner agencies that are either in English UK membership or have a contractual relationship with us, in order to provide a range of services including sending information about forthcoming events.

#### The wider industry

We collect personal data for staff at UK-based and overseas institutions that are involved in international education or in the English language teaching (ELT) sector in order to promote events that we run which they may be interested in attending.

#### Students

We collect data for students where we have the duty under the British Council Accreditation UK scheme to find an alternative course; where they ask us to investigate a complaint against an institution that is an English UK member; and where we run targeted promotional campaigns.

When collecting data for students, we may occasionally collect personal data for children. This information is normally provided to us by the parents, the centre where they are studying or by agents.

#### Website visitors

We use cookies on our websites for two reasons:

- i. Statistical: anonymous information about how many users we have, how often they visit, which pages are visited most frequently, and by what types of users, in what countries.
- ii. Technical: personal information to remember a visitor within the same browsing session and to ensure that the interface is adapted to their device (e.g. when you click 'remember me')

To access the statistical insight about, we use Google Analytics as a third-party supplier, which also stores cookies when these websites are visited. <u>View the Google privacy policy</u> and the <u>cookies used</u>.

You can turn off cookies, but if you do, you may not be able to use all the features on our websites and we may not be able to store your preferences (such as whether you have accepted cookies). This will not prevent other cookies being placed on your device unless you adjust your settings.

For more information about cookies and managing them, including how to turn them off, please <u>view</u> <u>our cookie policy</u>.

By using English UK's websites, you are agreeing to the use of cookies as described.



Type of data	Reasons for collecting	Retention period	Shared with
General contact information	Membership application Membership profile form Corporate member application Partner agency application	Duration of membership and seven years after leaving membership unless other retention periods apply For former members and/ or staff, we retain a record of the membership but delete the email address	English UK staff
Full name Job title Organisation name Organisation email Organisation address Organisation phone number	Event and training registration	One year from date of event Record of registration is kept on our database until such time that the record is no longer required	English UK staff Event organisers Trainers Venues
	Accreditation consultancy applications	Duration of the subscription and one year thereafter unless the applicant joins membership Record of the subscription is retained on our database until such time that the record is no longer required	English UK staff Consultants
Personal contact and financial information Full name Personal email address Residential address in the UK Personal bank account details	Allocating new courses to students in the event of language centre closure Refunding accommodation and travel costs to students in the event of language centre	Until the placement is finalised and/ or final payment is made Until confirmation that the payment has been made by the language centre involved in the complaint	English UK staff Main contact and other relevant staff at language centre involved in the complaint
	closure Processing complaints submitted by students, including refunds where agreed	A record of the complainant's full name, a summary of the complaint and outcome is retained until such time that the record is no longer required	
	Processing payment to customers and members	A record of the payee and payments are kept on the financial system for a maximum of six years The name, email address and residential address is retained on the database until no longer required	English UK staff Financial systems
Email address (only)	Subscribers to English UK discussion forum	Until unsubscribed	English UK staff Yahoo!
Disability and dietary requirements	Participation at our events and training	Until the end of the relevant event	English UK staff Event organisers Venues Trainers
Passport number	Accommodation bookings and emergency planning procedures at events Visa documentation	Until the end of the relevant event	English UK staff Venues Relevant third parties in the case of an emergency
	Visa support letters to students in the event of language centre closure	Until notification is received that the visa has been issued	English UK staff Staff at receiving language centre
First name, last name Date of Birth	Issuing certificates to participants, both immediately after completion and in future	No end date	English UK staff Awarding bodies
	Allocating new courses to students in the event of language centre closure	Until the placement is finalised	English UK staff Staff at receiving language centre
Photographs and videos of delegates at our events	Visual evidence of the event Event promotion	Record is retained until such time that the record is no longer required	English UK staff Designers and publishers Public (digitally)

# 5- How we collect this information about you

We collect the information listed through different channels:

- i. digital/ online forms e.g. for membership, event participation
- ii. phone calls and correspondence
- iii. visiting our websites and/ or social media pages
- iv. our participation at other international education events

# 6- How we use your information

We process your personal data in accordance with our obligations under applicable data protection laws and regulations, for the following reasons:

ENGLISH

- i. to provide certain services as part of your membership such as receiving newsletters and accessing the member-only content on our website.
- ii. to provide you with details of events and services that you have requested or that we think may be of interest to you.
- iii. to notify you of changes to our services and/ or member benefits.
- iv. for internal administrative purposes, e.g. updating records or implementing credit control.
- v. to comply with applicable laws and regulations in relation to requests from statutory agencies (such as the Information Commissioner's Office, the police or HMRC).

# 7- How long we keep your personal data

We only keep your information for as long as we need it to provide you with the services or information you have requested, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with those that have asked us not to.

Please see section 4 for more details of our retention period. When we no longer need this information, we will dispose of it securely.

# 8- Where we store your personal data

We store your data on two different platforms:

- i. on-premises server
- ii. public and private cloud-based storage

We may need to transfer and store information outside the European Economic Area (EEA). It may also be processed by persons operating outside the EEA. Where we send your personal data outside the EEA we will ensure that any organisations we work with have the same commitment to privacy as us. By submitting your details, you agree to this transfer.

Any payment transactions will be encrypted using SSL technology (SSL stands for 'Secure Sockets Layer' and creates encrypted connections).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.



# 9- Who has access to your information

We allow our staff or those representing English UK to access and use your information for the purposes for which you have provided it to us (as outlined in section 4). Any third-party agencies engaged by us to carry out our services are carefully selected and required to demonstrate compliance to UK data protection legislation.

We will only share your personal information with third parties where it is directly relevant to the services you have requested. We require third parties to treat your data with the same level of care as if we were handling it directly.

We may also disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation, or in order to enforce or apply any agreements, or to protect the rights, property or safety of English UK or others.

### **10- Your consent**

We always seek your consent at the point of collecting data.

You can withdraw your consent at any time. Please see section 12

If you request not to receive any further contact from us, we will keep a record so we know not to contact you in the future. This will include your name, organisation and preference not to be contacted

# 11- Your rights

We understand that privacy and data are sensitive and important. You have a number of rights in relation to your data. These are:

- i. The right to be informed: this privacy policy details how and why we collect, store and use your personal data
- ii. The right of access: you have the right to access the data and information we hold about you. Please see below for details on how to request this information
- iii. The right to rectification: we want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by contacting us using the contact details below
- iv. The right to erasure: you can request that we delete the information we hold on you by contacting us using the contact details below.
- v. The right to restrict processing: you can let us know how you want us to use your data by getting in touch with us using the contact details below.
- vi. The right to data portability: you have the right to request your data be provided in an easy to use format to another supplier.
- vii. The right to object: you can opt out of hearing from us at any point by contacting us using the contact details below.



# 12- Legal information and how to contact us

The controller of personal data is the company that determines the purpose and means of processing your personal data. The controller of your personal data for marketing purposes is English UK.

You have a right to access the personal information we hold about you and in certain circumstances to be provided with a copy of that information. You can request this by using the contact details below.

If at any time you do not wish to receive further information about us and our services, or you wish to change your contact details or preferences, please contact us using the details below. Please note that we will keep some basic contact information to ensure we don't contact you again in the future. If we completely erased your records then we wouldn't be able to ensure we don't contact you again in the future.

Data Protection Officer, English UK, 47 Brunswick Court, Tanner Street, London, SE1 3LH E: <u>dpo@englishuk.com</u> T: + 44 20 7608 7960

Requests will be dealt with and responded to within 28 days.

If you are unhappy with the way in which your personal data has been handled you are entitled to make a complaint to the Information Commissioner's Office.

W: <u>https://ico.org.uk/concerns</u> T: +44 303 123 1113