



Privacy Policy

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Intensive School of English & Business Communication Ltd. ("We") are committed to protecting and respecting your privacy.

This policy together with our terms of 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 (the "GDPR").

1. 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

Categories of data: Personal data and special categories of personal data

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 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.

Processing- means any operation or set of operations which is 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 - 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.

2. Who We Are

Intensive School of English & Business Communication Ltd. (ISE Brighton) is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are:

Postal address: 34 Duke Street, Brighton, East Sussex, BN1 1BS Tel: (+44) 1273 384800 Website: www.isebrighton.com Email: info@isebrighton.com

For all data matters contact info@isebrighton.com

3. 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.

3.1 Personal data for the provision of English and foreign language courses

Collection

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 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 or requirements
- Emergency contact information (names, phone numbers, email addresses)
- Medical information, which is relevant
- Special education needs information
- Characteristics eg language, 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

Use

We will use this personal data in the provision of our services, including for the necessary administration of a course 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 to students and fulfil our contract with them
- 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 at ISE
- 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

Sharing

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

- Inspectorate bodies such as The British Council, ISI (Independent Schools Inspectorate).
- Professional bodies of which ISE Brighton Ltd is a member. These may include English UK and Quality English.



- UK Visas and Immigration upon request.
- Educational Tour Organisers and Educational Consultants who work with ISE to send students to the school.
- Host families/Homestay accommodation providers.
- Our student database software technical support provider, RV3
- Taxi/meet and greet companies who provide student airport transfer services.
- Photos of students taken at social programme events and at school are shared on the schools social media sites, including Facebook, Twitter and Instagram.

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.

ISE Brighton Ltd. uses student photos, nationality statistics and age statistics 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 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 ISE Brighton 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 photos of students of the school. 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.

ISE Brighton Ltd. never shares student information for marketing purposes with third party marketing companies.

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 5 years 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 five years we will anonymise any data held on the system relating to the student that could be used to personally identify them. Eg. names, DOB, passport information. After this period of time any student data held in folders on our system is manually deleted. After that, we keep records only of the dates of attendance and student nationality on our database to form the basis of figures for quality development planning within the school and figure analysis. 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.

3.2 Personal data relating to accommodation providers for our students Collection



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, interest, details of children or partners)
- Relevant medical information
- Bank information

Use

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 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 accommodation provider information to us or if you have a choice in this.

Sharing

We share accommodation provider information with:

- Students who will be placed with the accommodation provider.
- Educational Tour Organisers and Educational Consultants who work with ISE Brighton Ltd to recruit students for the school.
- Inspectorate bodies including The British Council
- Professional bodies of which ISE Brighton Ltd is a member such as English UK
- 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 ISE Brighton Ltd.

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 ISE Brighton Ltd.

ISE Brighton Ltd. is marketed through our website and through a digital brochure or flyers which are 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 ISE Brighton 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.

ISE Brighton Ltd never shares accommodation provider information for marketing purposes with third party marketing companies.

Retention Period

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 that only necessary and approved members of the school staff have access to.

When the school no longer works with the accommodation provider, this data is deleted after 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.

3.3 Our newsletters, other information services & marketing materials (“Our Marketing Information”)

Collection

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, for example when you let us know those areas of our business that you are interested in receiving information about.

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.

Use

Personal data will be used to provide you with our Marketing Information that you ask for, or that we think are relevant to the preferences that you may have given to 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 to do so.

Disclosure

We may share personal data with third parties in respect of the provision of our Marketing Information, including to third parties who provide services to us, including 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.

Retention period

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).

1. 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 EEA by processors acting on our behalf. For transfers to countries not considered adequate by the EC, we will ensure that personal data is



adequately protected, as required by the GDPR. This would include by use of the Standard Contractual Clauses adopted by the EC to protect personal data.

2. 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 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), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- 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).

• Automated decision making

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

1. 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 are fine with this. 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 (eg Mac or Windows) which helps to identify when our site isn't working as it should for particular technologies, how long visitors spend on the site, what page they look at etc. This helps us continuously to improve our website. These so call "analytics" programs also tell us, on an anonymous basis, how people reached this site (eg 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



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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/>

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.

4. 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.

5. 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.

6. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative on info@isebrighton.com

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.