



**Suzanne Sparrow Plymouth Language School**

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## PRIVACY STATEMENT

The Suzanne Sparrow (Plymouth) Language School is committed to making sure that the privacy of our data subjects is protected.

This privacy statement explains what information we collect, how we use this information, how our data subjects can tell us if they prefer to limit the use of their information, and the procedures that we have in place to safeguard their privacy.

### **We collect information from the following data subjects:**

- Students and their next-of-kin (emergency contacts)
- Homestay Providers
- Personnel (teaching and admin staff)
- Agents/School Groups

### **We collect personal information:**

- **To help students to enrol for our courses** and send them the information they need to attend. We require the following information, as a minimum:
  - full name
  - date of birth
  - nationality and first language
  - address
  - email
  - mobile phone
  - gender
  - emergency contact details
  - passport details
  - we will need more information for different services, such as arranging accommodation or arrival/departure transfers.
- **To help homestay providers work with us.** The minimum information we need from homestays to provide accommodation is:
  - full name
  - date of birth
  - nationality and first language
  - address
  - email
  - mobile phone
  - gender
  - passport details (or alternative ID, such as driving licence)
  - DBS number and date (where applicable)

- **To engage teaching or admin staff.** The minimum information we need is:
  - full name
  - date of birth
  - nationality and first language
  - address
  - email
  - mobile phone
  - gender
  - passport details (or alternative ID, such as driving licence)
  - bank account details
  - national insurance number
  - DBS number
  - degree and teaching qualification details
  - reference details
- **To help agents and school groups to work with us.** The minimum information we need is:
  - full name
  - organisation name (where relevant)
  - address
  - email
  - mobile phone
  - bank account details (where relevant)

### **Our Privacy Promise:**

- We will make sure that we have appropriate data security measures in place.
- We will make sure that our partners have appropriate data security measures in place
- We will respect privacy. Students and agents will only receive marketing emails from us, if they opt in to receive marketing material from us.
- We will collect and use personal information only if we have permission or we need to collect enough information to process a student's enrolment, engage a member of staff or engage a homestay.
- We will be clear about what information we will collect and how we will use it.
- We will use personal information only for the purposes for which it was originally collected.
- If a data subject would like us to check, change or erase their data, they may do so at any time, provided that it does not affect our legal or contractual obligations.

### **What information we collect and how we use it:**

We collect information:

- When students enrol for a course
- When homestay providers, agents and school groups work with us
- When we engage teaching or admin staff
- Through cookies on our website (anonymous data)

## **Legal Bases**

- **Contract**
  - Students or their agents give us data to process an enrolment so that we can provide a service to them.
  - Homestay providers give us data so that we can place students in accommodation with them.
- **Vital Interest**
  - Emergency contact information
- **Legal Obligation**
  - Passport, DBS, visa information
- **Legitimate Interest**
  - We may give student and/or homestay information to our teachers, admin staff, homestays, transfer providers, social & programmes organiser, agents and other subcontractors to make sure that the services which form part of our contract can be delivered.
- **Consent**
  - Any secondary processing of data (contacting students after their course to give follow-up information or market courses or contacting agents/school groups). This means we will not send communications unless specifically agreed.

We will always make it as easy as possible for our data subjects to choose not to allow us to use their data, providing it does not prevent us from giving them the service requested or undertaking the agreed contract.

## **How long do we keep data?**

We will hold information for **7** years after a student's course has finished/an employee contract has ended/a homestay relationship or agent/school group relationship has ended. After this time, the data is managed to make sure that it is either erased from our system, or minimised and kept for legal reasons.

## **What anonymous statistical data do we keep?**

We collect statistics from our website, so we can monitor how people use it, and so we can develop our services. These statistics do not include information that can be used to identify an individual.

We also collect statistics from our student and agent database so that we can analyse our student bookings. These statistics are reported to English UK and the British Council, however they do not include information that be used to identify an individual.

## **How can I check, correct, limit or erase use of my information?**

You can check, correct, instruct us to limit or erase any personal information we might hold about you. You can also ask us to provide all the information we hold on you.

### **Who do you share my data with?**

We may share your personal information in response to government requests, to operate our systems properly and to protect both us and our users.

Any other organisations who have access to personal information while providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your information and keep to data protection and privacy laws which apply (see above legal bases for collecting and holding data). We may also independently audit these service providers to make sure that they meet our standards.

### **How we protect your information**

The safety of any data sent via an online communications technology, such as email, cannot be guaranteed. When your personal information reaches us, however, it is stored securely and confidentially in accordance with GDPR.

### **Google Analytics cookies**

These first-party cookies are used for anonymously tracking visits to our website. No personally identifiable information is stored and the data is not shared with other domains. We use Google Analytics for anonymous reporting of our website usage. If you would like to opt-out of Google Analytics monitoring your behaviour on our website, please use this link <https://tools.google.com/dlpage/gaoptout>.

Preference cookie (accept\_cookies\_en)

This first party cookie contains only the word "yes" and flags your acceptance of cookies on our website in general (as indicated by your continued use of [www.sparrow.co.uk](http://www.sparrow.co.uk)).

For more information about cookies and managing them, including how to turn them off, please visit please see [www.allaboutcookies.org](http://www.allaboutcookies.org)

By using our website, you are agreeing to the use of cookies as described above.

### **Changes to the privacy policy**

Any changes to our Privacy Policy will be detailed here. If these changes are significant, we may also email relevant people with new details. If we are required by law, we will obtain your consent to make these changes