



Privacy Policy: how we manage your data.

Our aim is to keep your personal data secure at all times.

We will never pass on or sell your information to anyone, and we do not retain your financial information at any time or under any circumstances.

When processing data we will be guided by the following six principles outlined by the GDPR (General Data Processing Regulations) introduced in 2018:

- We will only collect data for specific and specified purposes.
- We will not collect data beyond what is necessary to accomplish those purposes. We will minimise the amount of information we collect from you to what we need to deliver the services required.
- We will collect and use your personal information only if we have reasonable business reasons for doing so, such as managing a booking or gathering necessary information about a new member of staff or for a homestay family.
- We will not use data for purposes other than that for which the data was collected.
- We will seek to verify and/or update data periodically, and we will accept requests for amendments of personal data.
- We will apply high technical standards to ensure that our processing of data is secure.

Information we may collect from you.

The data that we collect and process about you may be supplied personally or we may collect this information from anyone acting your behalf, such as parents, tutors or educational agents.

This information has normally been gathered using the following methods:

- Information that you provide on our online forms. This includes information provided at the time of registration, requesting information or applying to study or work with us.
- Information that you provide by completing any paper application form (including medical information) when applying to study or work with us. This will include copies of written or printed documents you supply to support your application.
- Information you provide via email, written correspondence or verbally.
- Information supplied by a third party and relevant to you such as your educational references, exam results, sponsorship details and English test results.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete feedback forms that we use to evaluate our courses.



IP addresses and cookies

If you accept cookies on our website, the cookie will collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate data. This is statistical data about our users' browsing actions and patterns and does not identify any individual. We will not collect personal information in this way.

Cookies help us to improve our site and to deliver a better, more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies.

Where we store and use your personal data.

The personal data that we collect from you will be primarily stored on our encrypted company computer. This will include among other things, the processing of your application and visa, arranging your studies, teaching and any tests or exams. We will also use it for managing your education, processing your payments or reporting on your progress to you, your parents, sponsors or educational agents (where appropriate).

Information may also be shared between staff as appropriate and as necessary to meet the needs of our business and to deliver your education.

The data may also be used to meet our regulatory, legal, inspection or compliance responsibilities. By submitting your personal data, you agree to this transfer, storage or processing by Lyons Languages Ltd. We will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy policy.

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 site; 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 and keep your information secure.

Disclosure of your information.

We may disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation to do so. This includes exchanging information with national authorities such as, but not limited to, UKVI (UK Visas and Immigration), DBS (Disclosure and Barring Service) and the police.
- If appropriate we will also share your personal data with companies and organisations for the purposes of regulatory or inspection compliance and fraud protection.
- If you study with us and apply via an educational agent this information will be kept by them and disclosed to us.
- In the event of a medical emergency we will disclose your data to the appropriate medical authorities.
- If you have accommodation requirements we will pass the relevant details on to accommodation providers. You will be asked to consent to this before we do so.
- If you book an airport transfer we will pass the required information on to the transport providers.

Legal bases for processing your data.

The GDPR establishes six legal bases for processing your data: these are Consent, Contract, Legal Obligation, Vital Interests, Public Task and Legitimate Interests.

We use different legal bases for processing your data depending on the purpose for collecting your data in the first instance:

- For all data collected as part of the process of enquiring about, applying for and booking a course or for any other related service (e.g. homestay, airport transfer or our social programme), or where you give us feedback about aspects of this provision, we process using Contract or Legitimate Interests, namely the fulfilment of the booking. This may include sending of your data to our partners such as Educational Tour Operators (ETOs), Government Agencies or Schools. Where required by law to do so, we may also process your data under Legal Obligation.
- Any processing of customer data not directly related to the fulfilment of a booking or related services, such as signing up to our mailing list. From time to time, we may use elements of the data you supply to target the messages we send to you. During your studies with Lyons Languages, we may also take photographs or videos of you, and the use and processing of these is also managed through Consent.
- For all data collected as part of managing our relationship with commercial and external partners, we process using Contract, Legitimate Interest and Legal Obligation, namely the maintenance of the commercial relationship. As emails to commercial partners are an important part of how we communicate with them, these are managed under Legitimate Interest.
- For all data collected as part of the process of employing and managing staff, we process using Contract, Legal Obligation and Legitimate Interests, namely the employment of the employee. This will include data required for HMRC, pensions and insurance. Emails to staff will be managed under Legitimate Interest.



- For all data collected as part of the process of recruiting and managing homestay providers, we process using Contract, Legal Obligation and Legitimate Interests, namely the maintenance of the relationship with the homestay. As emails to homestays are an important part of how we communicate with them, these are managed under Legitimate Interest.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is Legitimate Interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is Legitimate Interest, namely the proper protection of our business against risks.

We will make it as simple as possible for you to opt out of unwanted processing under Consent, providing it does not restrict our ability to provide you with the primary service you have requested.

We collect data for a wide range of purposes. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or minimised and retained.

In certain situations, we are co-processors of information relating to marketing and booking clients with partners overseas (for example ETOs, schools, government and national sponsors). As such, we may transfer some data outside of the EU, but this will be limited to data necessary for the performance of a contract made in the interests of the individual (which is an exemption to the 8th principle of the GDPR legislation).

We remain responsible for the data held, processed or sent via our systems. We are not responsible for the security and processing of data which is held, processed or sent via our partners' systems. However, we require all of our partners to confirm that they will process data securely in line with the requirements of GDPR or the equivalent in their country. We do not sell your data at any time.

Special Category Data/Criminal Record Data.

We may request health data from potential students and employees. This data has special protection under the GDPR under the specific conditions listed in Article 9(2) of the GDPR that processing is necessary either to protect the vital interests of the data subject, (or of another natural person where the data subject is physically or legally incapable of giving consent), or where processing is necessary for the purposes of preventive or occupational medicine or the assessment of the working capacity of an employee.

The school has safeguarding responsibilities and carries out DBS checks on all staff and other people who are likely to have direct supervisory responsibility for or unsupervised contact with young people under the age of 18. We may process and record securely risk assessments of these DBS checks where the disclosure is not clear.



These risk assessments will be disposed of securely when that person no longer has supervisory responsibility or unsupervised contact with young people under the age of 18 on behalf of the school.

Children under 18.

We collect or store personal information about children under the age of 18 in the context of managing bookings and related products, and for safeguarding purposes. Permission is obtained directly from a legal adult guardian to collect this information through our Parental Consent Form. As part of this process, we request special category data relating to the health of the child, which we manage through Vital Interest.

We also gain consent from parents for the use of photos or video taken during their child's stay with Lyons Languages.

How we process your financial data.

When you pay for your course, you will always have the following options:

- To pay in cash or cheque at the school
- To pay by secure online bank transfer.

Again, we do not hold any of your personal financial information. We provide you with our bank details to make a secure transfer directly from your bank. All transactions are processed through your bank and are not stored or processed by us.

How long we hold your data.

We will hold your data as long as you continue to study or work with us, or for a period of **five years**, whichever is the longest. During this time, any person whose data we hold may request access to their personal data which will be provided free of charge. Any requests for data should be made in writing.

At any time during this period you have a right to request that your data be permanently erased from our systems. As far as is possible, while also fulfilling our legal responsibilities, we will comply with your instructions.

After five years, all personal data held by Lyons Languages will be destroyed in all the formats in which it is held, whether digital or hard copy.

Rosalind and Siobhan Lyons

Directors

February 2021