

ELAC STUDY VACATIONS' PRIVACY NOTICES



Staff Privacy Notice:

1. Data Controller and Data Protection Lead:

When referring to personal data gathered directly from our employees, ELAC Study Vacations will act as the data controller. For any enquiries, data breach notifications or subject access requests (SARs) please contact our Data Protection Lead, Sara Liras on saraliras@elac.co.uk.

2. Purposes and legal basis for processing employees' data:

1. It's necessary in order to comply with a legal obligation (HMRC and UK employment law).
2. It's necessary to process the data in order to fulfil a contract.
3. It's necessary to protect the vital interests of the data subject or another person (only in case of an emergency when Safeguarding trumps Data Protection).

3. Categories of employees' personal data collected and processed:

- First name and Surname.
- Date of birth.
- Permanent home address.
- Passport number and expiry date.
- Mobile number.
- E-mail address.
- CV.
- University degree certificates and English teaching certificates.
- Tax codes, Student Loan notifications and P45s.
- Bank account details.
- Disclosure and Barring Services certificate's issue dates and numbers or international criminal records police checks.
- Next of kin's name and contact details.
- Professional references and referee's names and contact details.
- Children safeguarding and first aid training certificates.
- Allergies or dietary requirements.
- Medical fitness for work declaration.

4. Main recipients or users of employees' personal data:

- Permanent ELAC Study Vacations Head Office employees.
- Summer Centres' employees: centre managers, academic managers, activity managers and same-level colleagues.
- Payroll System: Brightpay
- Her Majesty's Revenue and Customs (HMRC)
- British Council

- Contracted homestay coordinators in Bath and Eastbourne.
- International business partners and clients (our Agents).
- Contracted transport service providers (coach drivers).
- Activity venues' bookings representative.

5. Data safeguards:

ELAC Study Vacations keeps its staff data, gathered as the data controller, in UK territory, and within the EU. Staff data will be collected and safely stored on password-protected folders within the company's private computer server, only to be accessed by the directors and the relevant recruitment and human resources personnel.

ELAC Study Vacations carries out regular Privacy Police, CCTV Police and data location and retention period checks for all our partnered summer schools. We ask them to keep any of our staff data within EU territory and for it to be securely disposed of after a maximum period of 28 days.

6. Employees' data retention period:

ELAC Study Vacations is under the legal requirement to keep employees' income and tax information for at least 3 tax years. Our decision is to keep employees' income and tax details, together with any other personal data gathered, for a maximum period of 3 tax years, after which the data will be permanently erased from our internal server by professional IT technicians.

This decision is justified by the fact that most of our staff members are seasonal and do not return to work for us ever again, therefore we believe once their employment with us is finished, it is unnecessary, and a bigger threat to their data, to keep their high-risk personal information on our system for any time longer than that stipulated by the current UK law.

7. Our employees' data rights:

1. Right to be informed.
2. Right to access.
3. Right to rectification.
4. Right to erasure.
5. Right to restriction of processing.
6. Right to data portability.
7. Right to object.
8. Right not to be subject to a decision based solely on automated processing, including profiling.

Our employees also have the right to withdraw any previously-given consent at any time, and they have the right to lodge a complaint with the ICO (supervisory authority):

Information Commissioner's Office (ICO): <https://ico.org.uk/concerns/>

Telephone: +44(0)3031231113

8. Our employees' statutory and contractual obligations:

Since the personal data we collect is used for the main purposes of fulfilling a legal requirement and their contracts with us, failing to provide their requested details may result in a contract breach and job dismissal, salary retention or late salary payment, or any other appropriate penalising decisions made by the company Directors if necessary, on a case by case basis.

To read our full Privacy Policy, please go to www.elac.co.uk .

Homestay Provider Privacy Notice:

1. Data Controller and Data Protection Lead:

When referring to personal data gathered directly from our homestay providers, ELAC Study Vacations will act as the data controller, with our homestay coordinators acting as the data processors.

For any enquiries, data breach notifications or subject access requests (SARs) please contact our Data Protection Lead, Sara Liras on saraliras@elac.co.uk .

2. Purposes and legal basis for processing homestay providers' data:

4. The data subject has given consent to process their data for 1 or more purposes (primarily to allocate students to their available rooms).
5. It's necessary to process the data in order to fulfil a contract or agreement (both with the homestay provider and the British Council).
6. When processing is necessary for the purposes of the legitimate interest of the controller, the processors and the homestay providers.
7. It's necessary to protect the vital interests of the data subject or another person (only in case of an emergency when Safeguarding trumps Data Protection).

3. The legitimate interests of the controller, the processors and the homestay providers:

It is in the interest of the three parties involved to collect, process and use our homestay providers' details in order to be able to accept and place groups of students or individual students who have specifically requested homestay accommodation in order not to limit our market/margin of action; to continue providing work to our contracted homestay coordinators, who are self-employed; and finally, to offer an enriching international experience, plus an extra income, to our homestay providers as often as possible.

4. Categories of employees' personal data collected and processed:

- First name and surname.
- Date of birth.
- Permanent home address.
- Landline phone number.
- Mobile number.
- E-mail address.
- Bank account details.
- Disclosure and Barring Services certificate's issue dates and numbers of any over 18s in the household.

- Personal character references and referee's names and contact details.
- Signed homestay agreements.
- Signed risk assessments.
- Family structure, including name and age of partners and children, their interests and their property's description.

5. Main recipients or users of homestay providers' personal data:

- Permanent ELAC Study Vacations Head Office employees.
- Summer Centres' employees: centre managers, homestay coordinators and sometimes activity leaders.
- International business partners and clients (our Agents).

6. Data safeguards:

ELAC Study Vacations keeps its homestay providers' data, gathered as the data controller, in UK territory, and within the EU. This will be collected and safely stored on a password-protected database provided by Infospeed Ltd., which is a software installed within the company's private computer server, and can only be accessed by the company directors, permanent Head Office employees, summer centres' operation managers and our self-employed homestay coordinators.

ELAC Study Vacations has checked and keeps a copy of Infospeed's Privacy Policy and their instructions to "GDPR delete" homestay providers' profiles off the database. We are also aware of their data security measures to protect our homestay providers' information.

7. Homestay providers' data retention period:

Hosts who no longer actively host are recorded as "inactive" on our database and "GDPR deleted" from it after 3 years of inactivity. Any related documents saved securely on our internal server will be also deleted permanently.

8. Our homestay providers' data rights:

9. Right to be informed.
10. Right to access.
11. Right to rectification.
12. Right to erasure.
13. Right to restriction of processing.
14. Right to data portability.

15. Right to object.

16. Right not to be subject to a decision based solely on automated processing, including profiling.

Our homestay providers also have the right to withdraw any previously-given consent at any time, and they have the right to lodge a complaint with the ICO (supervisory authority):

Information Commissioner's Office (ICO): <https://ico.org.uk/concerns/>

Telephone: +44(0)3031231113

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