

ELAC Study Vacations – Privacy Policy

This is the general privacy policy for ELAC Study Vacations.



WHO WE ARE AND WHAT WE DO

We are an English Language company that provides teaching services for international groups of students. We have been a British Council accredited provider of English language and activity courses since 2008. We are also a member of English UK and Young Learners English UK.

We have three prime aims for all our students:

1. To improve their English language skills quickly.
2. To learn about British life and culture.
3. To make new friends from many different countries.

In order to achieve this we provide a secure and happy environment where students can feel at ease with each other, whilst on a course which they find both stimulating and challenging. We believe this provides the greatest opportunity for language learning and development.

OUR PRIVACY STATEMENT

1. The protection of your privacy and personal information is important to us. We make sure that not only do we have appropriate security measures in place but that any other organisation we work with to provide a service also meets the same standard as us.
2. We will respect your privacy. You should receive promotional/marketing emails from us only, and we will make sure that the boxes you need to tick if you are happy to receive marketing are presented clearly and at an appropriate time.
3. We will make it clear at the point when we request your information about what we are collecting it for and how we are going to use it.
4. We will collect and use your personal information only if we have your permission or we have sensible business reasons for doing so, such as collecting enough information to manage or process your employment registration or course enrolments.
5. We will minimise the amount of information we collect from you to what we need to deliver the services you have requested.
6. We will be clear in our dealings with you as to what information about you we will collect and how we will use it.
7. We will use personal information only for the purposes for which it was originally collected and we will make sure we delete it securely.
8. Our website and active social media accounts are accessible via the internet. Please remember that if you post any comments or links on any of our sites, they can be read and accessed by anyone and everyone.

9. If we, our service providers, or our business partners transfer any information out of the European Economic Area (EEA), it will only be done with the relevant legal instruments and security measures being in place and stated on their individual Privacy Policies.

WHAT INFORMATION WE COLLECT

Personal information we may collect:

- Biographical information for our students and group leaders for course enrolment purposes: name, date of birth, gender, nationality.
- Student and group leader's passport number and expiry date for visa application purposes.
- Student and group leader's allergies, medical conditions, medical treatments and room-sharing preferences, for accommodation purposes.
- Student and group leader's contact details including postal addresses, e-mail addresses, telephone numbers and parent or guardian's contact details for consent and safeguarding purposes.
- Employee's name, date of birth, home address, mobile number, e-mail address, CV, education history, tax and income details, national insurance number, bank details, DBS certificate's issue date and number, referees' professional contact details, first aid training, allergies, next of kin contact details, and medical fitness declaration; for payroll and HMRC submission, employment, safeguarding and accommodation purposes.
- Homestay provider's name, date of birth, home address and landline number, mobile phone number, e-mail address, bank details, DBS certificate's issue date and number, personal character references, signed homestay agreements, signed risk assessments and household description.
- Customers and suppliers' information such as email addresses, telephone numbers, bank account details, and processed invoices in the interest of paying suppliers and/or fulfilling a contract.
- Please note that we do not collect or store: credit/debit card details or 'sensitive' information, such as racial/ethnic origin, political beliefs, religious/similar beliefs, Trade Union membership; or sexual orientation/activities.
- Any information disclosed related to an offence towards children under 18 will only be held for the length of time stipulated in our Staff Policy Handbook, and only used for the purpose of appropriate and safe employment decision-making.
- Any sensitive data relating to physical disabilities or medical conditions will only be held if it has been provided by you for the specific purpose of adjusting and facilitating a language course for a student or the timetabling and classroom access for a member of staff.

Use of children's data:

We only collect or store any personal information about children under the age of 18 in the context of processing their course enrolment, home-stay accommodation, transport arrangements, visa applications and travel insurance. This is applicable to children and young adults aged 9-18, where permission is obtained by us or a third party acting as the data controller directly from a parent or legal adult guardian to collect this information.

We collect information on you when:

- you contact us for information by phone or via email
- you work with us commercially as an agent, partner or contracted third party
- you send us students' personal details for language course enrolments and accommodation arrangements
- you accept to work for us as an employee
- you provide your personal and home details to become a homestay provider
- you use or interact with us via our website or our social media accounts
- through website cookies

Use of cookies:

We may use cookies on our company websites for two main reasons:

1. For statistical purposes to track how many users we have and how often they visit our websites. We collect information about which pages are most frequently visited, from what type of users and from which countries.
2. We may use other organisations to collect anonymous user information, sometimes through cookies and web beacons, so they are able to analyse how the website is being used and the number of visitors.

You can turn cookies off but you may not be able to use all services on our websites then. This is because we won't be able to limit what you see by using cookies. However, you will still be able to see our editorial content.

By using our websites, you are agreeing to the use of cookies as described here.

HOW WE PROCESS THE INFORMATION

At ELAC Study Vacations we collect different types of information about our clients and employees for seven main reasons:

1. To offer and provide personalised teaching and accommodation services for groups of students or individual students.
2. To arrange extra services provided by us or by contracted third parties (transport, insurance, visa applications, excursions...).
3. To comply with current law and obligations related to employment checks, payroll and pensions, and company accounts' finance.
4. To fulfil contracted services with our agents and third parties.
5. To ensure children safeguarding and monitor any issues or incidents.
6. To help us monitor and improve the services we offer.

7. To obtain consent from parents/guardians or the children themselves for medical, travel or promotional purposes.

Certain services that we provide may involve us collecting extra information (passport number and expiry date, height, shoe size, etc.), so that we can process your requests and tailor the information we give you even better.

Some of our services may have their own specific privacy policy because the services we provide in that instance are different, so please do make sure you know what is happening to your information.

WHAT LEGAL BASES WE USE FOR PROCESSING YOUR DATA

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

- For all data collected to sign up for a product or service, such as our annual homestay newsletter, we process the data using Legitimate Interest, i.e. you are able to access an extensive range of information in exchange for supplying your information, and we have a relationship where the balance of benefits is in your favour. You always have a choice in the management of your data in this manner and can opt out of processing under this basis at any time.
- When you provide data in the course of the purchase of a service (like a course) or under explicit request, we process your data under Contract, i.e. your data is necessary for the fulfilment of the service and task required. Any additional contact, i.e. telling you about another service closely related to the service you have bought is managed under Legitimate Interest.
- Any secondary processing of your data, i.e. sharing with third parties, sending your messages on behalf of third parties, transfer to third countries, is managed under Consent.

Under the terms of current data protection legislation, we will always make it as easy as possible for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the service you have requested.

HOW LONG WE RETAIN DATA AND HOW WE DISPOSE OF IT

Because we collect data for a wide range of purposes, we do not have a singularly defined retention period, unless specified by law. For each individual service we define a carefully assessed timeframe within which we retain your data.

After this, data is managed to ensure that it is either erased from our system, minimised and retained for legal reasons, or pseudo-anonymised and retained on a global suppression list to ensure that you do not receive unwanted messaging from us.

YOUR RIGHTS

Under current data protection legislation, you have the right to rectify, erase or restrict the processing of your data without undue delay. You may also request access to the data we hold on you.

To do this or to update your personal information at any time, please contact our Data Protection Lead, Sara Liras, by email saraliras@elac.co.uk or telephone 01225 443261.

DISCLOSING OR SHARING YOUR DATA

Your personal data may be shared within the group of employees and contracted third party companies working for ELAC Study Vacations. For example, when there is a direct crossover between services and processes where your data is necessary.

We will not share your personal information with others for marketing purposes unless you have given us your permission. If we have your permission, we will share your information only with other organisations we have chosen carefully, and which also comply with the current data protection legislation.

We may make other organisations' services available, when requested by you. We will process any information that we collect when you access or request a service provided by another organisation under this privacy policy. Information these other organisations collect is governed by their own privacy policies.

We can access and release personal information to keep to relevant laws and government requests, to operate our systems properly and to protect both us and our users.

Any other organisations who access your information in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your information and comply with data protection and privacy laws. We may also independently audit these service providers to make sure that they meet our standards. We may use service providers to help us run these services, some of whom may be based outside the EEA or countries deemed *adequate* by the European Data Protection Board.

LEGAL INFORMATION ON HOW TO CONTACT US

Under the current Applicable Laws we have to specify who the "data controller" is for ELAC Study Vacations services, provided via our websites, events, email communications, etc.

The data controller is the organisation responsible for protecting information and, in the case of the personal information directly related to employees, home-stay providers, individual students and contracted third parties (insurance, visas, transport...), the controller is ELAC Study Vacations.

For personal information relating to the enrolment of group of students and the processing of their data for other purposes, the agents are the responsible "data controllers" and ELAC Study Vacations is the "data processor".

If you would like access to or a copy of the personal information we hold about you, to request a correction, or if you have any questions about how we may use it, or to make a complaint, please contact the Data Protection Lead, Sara Liras, by email on saraliras@elac.co.uk or telephone (01225 443261).

Requests will be dealt with by the Data Protection Lead, and will be responded to within a reasonable period, not longer than 30 days.

If you are not satisfied with the way our request was handled, you have the right to lodge a complaint with the supervisory authority:

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

Telephone: +44(0)3031231113

CHANGES TO OUR PRIVACY POLICY OR STATEMENT

If we make changes to our Privacy Policy, we will show you what they are here. If these changes are significant, we may also choose to email relevant individuals with new details. If we are required by law, we will obtain your consent to make these changes.

Our Privacy Statement will be up-to-date and accessible at all times from our website: www.elac.co.uk

Changes to this policy by date:

April 2018 – New Company Privacy Policy created.

May 2018 – Company Privacy Policy was modified to cover and specify all types of data we collect and their purposes and to unify its format and style