

<h1>Privacy Policy</h1>	<b>FUNCTIONAL AREA: WHOLE SCHOOL – EDUCATIONAL TOUR OPERATORS (ETOs)</b>
Updated: November 2018	The policy is reviewed periodically

## 1. Information about Capital School of English, Bournemouth

Capital School of English Limited (Capital SE Limited) are always committed to delivering a professional service and an exceptional customer service for our partners and students. Capital School of English (trading as Capital SE Limited) (“we” or “us”) take the privacy of all our Students, Educational Tour Operators (ETOs), Partners, Homestay Providers and Employees seriously.

This Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we’ll store and handle that data, and keep it safe.

Please read this Privacy Policy carefully as once you use our website and/or the services it provides (“Services”) you will be regarded as having read and accepted this Privacy Policy. You must not use our website or our services if you do not accept this Privacy Policy. We hope this Privacy Policy will answer any questions you have but if not, please get in touch with us ([info@capitalschool.co.uk](mailto:info@capitalschool.co.uk)).

It’s likely that we’ll need to update this Privacy Policy from time to time. We’ll notify you of any significant changes, but you’re welcome to come back and check it whenever you wish.

Capital SE Limited is registered with the Information Commissioner Office (ICO) in the UK as a “data controller” in relation to the services and your personal information. All data will be kept in accordance with the provisions of the General Data Protection Regulation (GDPR) (25th of May 2018).

Capital SE Limited (company number 04789251).

Our registered address is 324 Wimborne Road, Bournemouth, Dorset, BH9 2HH, UK.

## 2. Explaining the legal bases we rely on

The General Data Protection Regulation (GDPR) (25th of May 2018), sets out a number of different reasons for which a company may collect and process (store, handle, keep it safe, and destroy) your personal data, including:

### Consent

In specific situations, we can collect and process your data with your consent.

*For example when you tick a box to receive email newsletters.*

When collecting your personal data, we’ll always make clear to you which data is necessary in connection with a particular service.

### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations.

*For example, if a student orders a taxi to collect them from the airport on arrival, we'll collect the student's full name, flight details, and destination address to ensure the student reaches their destination, and pass them to our taxi provider.*

### **Legal compliance**

If the law requires us to, we may need to collect and process your data.

*For example, we collect student passport details and/or biometric data to ensure they are legally entitled to study in the UK.*

### **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

*For example, we will send Educational Tour Operators any updates to our tuition and accommodation fees to ensure they can pass on the most up-to-date information to students.*

We also combine the enrolment history of many students/ETOs to identify trends and ensure we can keep up with demand, or develop new products/services.

### **3. Cookies**

Like many websites, when you visit our website we issue a 'cookie' or unique code that allows us to identify your computer. We use the cookie to record where applicable, the website that referred you to our website and to note the different areas of our website recently accessed through your computer – it is only used in relation to our website and not in relation to any other websites you may visit. We may use the information collected in this way to tell you about services or products which might be of interest to you when you make further visits to this website. If you do not accept incoming cookies then the performance of our website on your system may not be to full standard.

### **4. The Information we collect**

Capital SE Limited will process a wide range of data on students, Educational Tour Operators, Homestay providers, employees and those who contact us. Personal data can be collected directly from the person, or through a third party, such as an Educational Tour Operator.

What sort of personal data we collect on students	When we collect personal data on students
<ul style="list-style-type: none"> <li>- Data to enrol you as a student at Capital SE Limited: your full name, gender, date of birth, country of residence, nationality, first language, address in your country, phone number, email address, dietary requirements, medical conditions, next of kin details (full name, phone number, email address, relationship to student, level of English).</li> </ul> <p>NOTE: By completing this Online Student Enrolment Form you will be sending information about yourself across the Internet. Whilst every effort is made to keep this information secure, you should be aware that we cannot offer any guarantees of absolute privacy. If this matter concerns you then you should use another method to notify us of your information.</p> <ul style="list-style-type: none"> <li>- Details of your interactions with us on our database (EduPro). For example, we collect notes from our conversations with you, details of any complaints or comments you make</li> <li>- Copies of documents you provide to prove your age or identity where the law requires this, (including your passport and/or national identity card). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality. Visa information.</li> <li>- Your image may be recorded on CCTV when you visit the school or an external site used by the school.</li> <li>- All telephone calls to the school direct number are recorded for training and monitoring purposes.</li> <li>- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.</li> </ul>	<ul style="list-style-type: none"> <li>- When you (students) complete our enrolment form online on <a href="http://www.capitalschool.co.uk">www.capitalschool.co.uk</a></li> <li>- When your ETO completes our enrolment form online on <a href="http://www.capitalschool.co.uk">www.capitalschool.co.uk</a> or when your ETO submits their enrolment form to Capital SE Limited on your behalf</li> <li>- When parents and/or legal guardian of students Under 18 complete our Parental Consent form.</li> <li>- When you (students) complete our 'Important details form' during your induction</li> <li>- When you (students) complete an 'Absence form'.</li> <li>- When parents and/or legal guardian of students Under 18 complete our 'Permission to travel' form.</li> <li>- When you fill in any forms. For example, in the event of an accident.</li> </ul>

<ul style="list-style-type: none"> <li>- Your bank transfer information in paper form (including your full name, address in your home country). This does not include bank details.</li> </ul>	
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<b>What sort of personal data we collect on Educational Tour Operators (ETO)</b>	<b>When we collect personal data on Educational Tour Operators (ETO)</b>
<ul style="list-style-type: none"> <li>- Data to register you as an ETO with Capital SE Limited: your full name, gender, country of residence, nationality, first language, address in your country, phone number, email address, type of company, position in the company, countries the ETO represents, social media addresses and the contact of the references the ETO provides.</li> </ul> <p>NOTE: By completing this Online ETO Enrolment Form you will be sending information about yourself across the Internet. Whilst every effort is made to keep this information secure, you should be aware that we cannot offer any guarantees of absolute privacy. If this matter concerns you then you should use another method to notify us of your information.</p> <ul style="list-style-type: none"> <li>- Details of your interactions with us on our database (EduPro). For example, we collect notes from our conversations with you, details of any complaints or comments you make.</li> <li>- Your image may be recorded on CCTV when you visit the school or an external site used by the school.</li> <li>- All telephone calls to the school direct number are recorded for training and monitoring purposes.</li> </ul>	<ul style="list-style-type: none"> <li>- When you (ETO) complete our ETO Application Form online on <a href="http://www.capitalschool.co.uk">www.capitalschool.co.uk</a></li> </ul>

## 5. Why we collect information

We collect data on students, ETOs and Homestay Providers to give you the best possible service.

The Data Privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

### Here's how we'll use your personal data and why:

The data we collect is used to:

- Process any enrolments of student. If we don't collect your personal data at enrolment, we will not be able to process your enrolment and comply with our legal obligations.
- Provide a quality service:
  - to safeguard students and ensure their wellbeing
  - to ensure the students safe arrival to the UK and to ensure they have a place to stay
  - support students in their learning
  - monitor and report their progress
  - provide pastoral care
  - publish examination results.
- Conduct internal audits
  - assess the school's overall progress
  - to compile statistical information (usually on an anonymous basis).
- Enable the relevant authorities to monitor the school's performance.
- Enable students to take part in examinations and to monitor their progress.
- Arrange the entire stay for a student through an Educational Tour Operator of the student's choice and to give the relevant information needed for their stay to this Educational Tour Operator.
- Other reasonable purposes relating to the school, such as information given to Homestay providers or others contractors, such as the taxi transfer company.
- Respond to your queries and complaints. Handling the information you provide enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and you from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard you. We'll do all of this as part of our legitimate interest.
- To protect our students, staff, premises, and assets from crime, we operate CCTV systems in our school which record images for security. We do this on the basis of our legitimate business interests.

- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.

## 6. How we protect information

We know how much data security matters to all our students, ETOs, Homestay Providers and Employees. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

Keeping your information secure is very important to Capital SE Limited. Access to your personal data is password-protected, and/or stored in secure locations and only relevant members of staff will have access to this information.

Any data stored on our computers are password-protected. We use an external IT company who have also undergone an internal audit to ensure they meet the GDPR requirements.

Capital SE Limited strives to protect your personal information sent over the Internet. However, no data transmission over the Internet can be guaranteed to be totally secure. Certain sections of the website may encrypt data using SSL or a comparable standard. As Capital SE Limited cannot ensure or warrant the security of any information which you send over the Internet, you do so at your own risk. If you would prefer you can post any information to Capital School of English at 324 Wimborne Road, Bournemouth, Dorset, BH9 2HH, UK.

## 7. How long we keep information

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

Students – Paper copies will be kept for 1 year after you last studied at Capital SE Limited or after a last external inspection (whichever is longer), so we can comply with our legal and contractual obligations.

Paper copies for students who cancel their course prior to their start date will be kept for 1 year, so we can comply with our legal and contractual obligations.

ETOs – We will keep the personal data you give us for 4 years after you last enrolled a student at Capital SE Limited or after a last external inspection (whichever is longer), so we can comply with our legal and contractual obligations.

## 8. How it is disposed

At the end of that retention period, your data will either be deleted completely or partially. Partial destruction will mean we keep on file any documents relating to safeguarding and/or Child Protection concerns. This information will only be shared with the relevant authorities, if required.

All personal data is securely disposed. We use Roman Group Bournemouth (<http://www.theromangroup.co.uk>) for secure shredding of all paper documents.

## 9. Who we share information with

Capital School of English may share or pass on information about you to third parties;

- local authorities
- public authorities
- Capital School of English's accrediting bodies (Accreditation UK or British Council)

Students - We sometimes share your personal data with trusted third parties, such as Homestay Providers, transfer companies (taxi), relevant authorities to monitor the school's performance.

ETOs – We sometimes share your personal data with trusted third parties, such as Accrediting Bodies and relevant authorities to monitor the school's performance.

### Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.
- All third party organisations are to comply with GDPR themselves.

### Sharing your data with third parties for their own purposes:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

## 10. What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.

- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

**You can contact us to request to exercise these rights at any time as follows:**

To ask for your information please contact The Data Protection Officer, Capital School of English, 324 Wimborne Road, Bournemouth, Dorset, BH9 2HH or email [info@capitalschool.co.uk](mailto:info@capitalschool.co.uk) To ask for your information to be amended please contact the school.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

If we choose not to action your request we will explain to you the reasons for our refusal.

**Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

**Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

**Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

**Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Policy.



If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## 11. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

## 12. Any questions?

We hope this Privacy Policy has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us on [info@capitalschool.co.uk](mailto:info@capitalschool.co.uk)

Or write to us at:

Data Protection Officer  
Capital School of English  
324 Wimborne Road  
Bournemouth  
Dorset  
BH9 2HH