

St Giles International Privacy Notice

This privacy notice explains how St Giles International collects, uses, and shares your personal data, and your rights in relation to the personal data we hold. It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data.

St Giles International needs to hold and process personal data relating to many people in order to keep proper records, provide advice, manage and fulfil contracts and comply with legal obligations. We hold financial information so that we can process payments; information on health and disability so that we can provide support and assistance to students, staff, visitors, and guests; and many other categories of information, which are more fully set out below, to both run the business and activities of our schools and to fulfil our legal obligations.

St Giles International is the trading name for St Giles Schools of Languages Limited (company number 596651 and registered address at 154 Southampton Row, London, WC1B 5JX, United Kingdom), so when we mention "St Giles International", "we", "us" or "our" in this Privacy Notice, we are referring to this company which is responsible for processing your data.

St Giles International is a data controller of your personal information and is subject to the General Data Protection Regulation ("GDPR"). We take the security and integrity of all the personal data we hold very seriously.

We have a Data Protection Policy (please see [St Giles International Data Protection Policy](#)) and our staff are trained in Data Protection.

We strive to ensure that our systems are secure. We do not release information about anyone to any third parties outside our schools unless we have a legal obligation to do so, or in very specific and limited circumstances, which are set out in this Notice.

1. Our contact details:

You have Right of Access to any data we hold about you. To contact us with an enquiry or to view, update, delete, or change any personal information we hold about you, or if you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the details below:

Email address: hq@stgiles.co.uk

Postal address: St Giles International Head Office, 154 Southampton Row, London, WC1B 5JX, United Kingdom

There is no charge for this service.

According to your rights, you may make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would appreciate the opportunity to deal with your concerns before you approach the ICO, so please contact us in the first instance.

2. What is personal data?

Personal data is information that relates to an individual. That individual must be identified or identifiable either directly or indirectly from one or more identifiers or from factors specific to the individual. Examples of personal data include a person's name, address, phone number and bank account number. It does not include data from which it is not possible to identify an individual (anonymous data).

3. Data protection principles:

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only for as long as it is necessary for the purposes we have told you about.
- Kept securely.

4. How and why we obtain and process your personal information:

We will only use your personal data in accordance with the law. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract we have with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be less common:

- Where we need to protect your vital interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.



Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

➤ **Information you voluntarily provide:**

When you complete a form on our website, consult with our staff or send us an email you are voluntarily providing us information. This information may include your name, company name, company address, email address, telephone number(s) and your position in your company.

We respect your privacy and will never disclose your personal information to a third party unless:

- It is necessary in relation to work we are doing for you and your company.
- Our company is acquired by another company and would therefore require it to continue working for you.
- We are requested to do so by lawful authority in relation to the GDPR (General Data Protection Regulation).

➤ **Information we automatically collect:**

When you use this website, we may collect information about which pages you visit, how much time you spend on a page and how you navigate through this website. That information may include the date and time, your IP address, your general location, your operating system and the browser you are using.

We may use various technologies to collect and store information when you use this website, and this may include using cookies and similar tracking technologies such as pixels and web beacons, to analyse trends, administer the website, track users' movements around the website, serve targeted advertisements, and gather demographic information about our user base as a whole. If you wish to opt out of interest-based advertising, see <http://www.youronlinechoices.eu/>. Please note you might continue to receive generic advertisements.

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| WHAT ARE COOKIES? |
| Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by online service providers in order to make their websites or services work, or to work more efficiently, as well as to provide reporting information. |

HOW TO TURN OFF COOKIES

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: allaboutcookies.org.

5. The personal data we collect from you and their purposes:

We may need the following personal information to deal with enquiries and/or process applications for study and accommodation:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email address
- Date of birth
- Gender
- Nationality and country of residence
- Passport number
- Visa information and immigration status
- Education history
- Employment history
- Funding information
- Bank account details
- Billing address
- Credit card or other payment information for processing your payments
- Attendance records

We may also ask you to disclose information regarding any criminal convictions you may have as part of your application. We need to use this information to comply with our legal obligations. This information, together with the personal data provided to us above at application stage, will be used by us to perform the contract we have entered into with you.

Furthermore, we will collect further personal data relating to your visa application and immigration status as we have a legal obligation to use this information.

During your studies, we will collect information about your academic experience and progression so that we can monitor the provision of our service to you and to fulfil our contract.

We will collect and store data relating to your attendance so that we can comply with visa regulations.



Additionally, we may also collect personal data about your health so that we can make appropriate arrangements and reasonable adjustments for you regarding your welfare, attendance, or accommodation. This is also necessary so that we can perform our contract with you and to fulfil our legal obligations.

We may also collect personal data about you if you are named as an emergency contact for an individual. We use this information as it is in the vital interests of such individual.

If you use an agent to arrange your application and study with us, we may collect the categories of personal data described above from your agent.

6. Marketing

Where we have your consent, we may use your personal data (such as name and email address) to inform you of special offers and new or existing services that we believe may be of interest to you. We may also use this data to send you surveys of questionnaires in order to learn more about your interests and needs.

If you would prefer not to be contacted for the purposes mentioned above, please follow the opt-out links on any marketing message or contact us using the contact details in this Privacy Notice.

7. Internal business purposes

We also may use your personal data for our internal business purposes. This is in our legitimate interests so that we can operate as a business and monitor and improve the services we provide. Where possible we will anonymise this information. Please contact us using the contact details in this Privacy Notice if you would like more information.

8. If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

9. When and how we share your personal data with others:

We may share your personal data with third parties where required by law, where it is necessary to perform our contract with you or where we have a legitimate interest in doing so.

Such third parties may include the following:

- **Our service providers:** We may share your personal data with other companies that perform certain services on our behalf. These services may include processing payments and supporting our website and IT functionality. These service providers may be supplied with or have access to your personal data solely for the purpose of

providing these services to us or on our behalf. St Giles International is the data controller and will remain accountable for your personal data.

- **Overseas Partners/Agents:** If you use an agent to arrange your application or study with us, we may share your personal data with them.
- **Parents and guardians:** If you are under 18, we may share your personal data with your parents or guardians in order to perform our contract, comply with our legal obligations and if it is in your vital interests.
- **Homestay hosts and residences:** If you have requested St Giles to arrange accommodation for you on your behalf, we may share your personal data (such as name, date of birth, nationality and home address) with your host or accommodation provider.
- **Regulators:** We may need to share your personal data if required by a regulator or to otherwise comply with law.
- **Immigration authorities:** There are legal requirements upon students studying at our schools to comply with the UK and/or Canada's visa regulations and restrictions which may include minimum attendance.
- **Others:** We may share your personal information with other third parties such as in the context of the possible sale of our business. We may also need to share your personal data in order to permit us to pursue available remedies or limit damages we may sustain.

10. Transfer of personal data to other countries:

As we are an international business with employees, entities and service providers in the UK and Canada. Therefore, the way we handle your data will be in compliance with regulations from these countries and as described in this Privacy Notice. Please contact us using the contact details in this Privacy Notice if you would like more information.

11. Our storage and retention of your personal data:

Your personal data will only be retained for as long as it is necessary in order to fulfil the purposes it was collected for. Please contact us if you require further information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your contract with us.

12. Your rights as a data subject:

By law, you have the right to:

- Request access to your personal data

- This is known as “data subject access request” and enables you to receive a copy of the personal data we hold about you and to check that we are processing it in accordance with the law.
- Request correction of your personal data
- Request erasure of your personal data
 - You can ask us to delete or remove your personal data where there is no good reason for us to continue to process or hold it.
- Request the restriction of processing of your personal data.
 - This enables you to ask us to suspend the processing of personal data about you (for example, where you want us to establish its accuracy or the reason for processing it).
- Request the transfer of your personal data to another party.
- Object to the processing of your personal data where we are relying on a legitimate interest, in exceptional circumstances.
- Withdraw consent to the collection, processing, and transfer of your personal data for specific purposes.

If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, withdraw your consent or request that we transfer a copy of your personal information to another party, please contact us using the contact details in this Privacy Notice.

A fee will not be charged if you would like to access your personal data. However, we hold the right to charge a reasonable fee, or refuse to comply with your request, if your request for access is deemed unfounded or excessive.

13.Changes to this Privacy Notice:

We reserve the right to update this Privacy Notice at any time, and you will be notified and provided with a copy of our Privacy Notice when substantial changes are made.

14. When and why we share your personal data with others and where it is stored:

In order to fulfil our contractual obligations with you, we work with several third-party organisations that perform tasks on our behalf, such as operating our website and providing essential services that enable us to conduct our business. We may need to share your personal data with them, only to the extent that it is necessary for the fulfilment of our contractual obligation with you and so long as these organisations agree to keep your information confidential. These third-party organisations act on our instructions and are the “processors” of your information.

The table below provides details of the third parties to whom we disclose your personal data and the reasons that make the sharing of your data necessary.

| Data recipient | Personal data shared | Reasons for sharing your data |
|--|--|--|
| St Giles group members (local centres) | All personal information outline above. | Our local group entity (centre) requires this information so that we can fulfil our contract with you. |
| Accommodation providers (homestay hosts or halls of residence) | Name, age, gender, nationality, and any medical conditions, special needs or dietary preferences. | To ensure that you receive the service you have booked and that your accommodation is suitable for your needs. |
| Transport providers | Name, arrival details, departure details and accommodation address. | To provide the transport service you have booked. |
| Activity providers | Name, age, gender | To provide the activity you have booked and ensure that it is suitable for you. |
| Our overseas partners (agents) | Name, date of birth, gender, mailing address, email address, phone number, nationality, purpose of studies, class level, the date and duration of studies. | So that our local overseas partners may provide services on our behalf to you, such as booking your course in your own country to residence. |
| Learning management IT system providers | Name, assessment results, progression data, interests, class level and purpose of studies. | So that we can monitor your academic progress and tailor your work to your needs. |
| Regulatory authorities | Name and other identifying information. Your attendance records. | To enable us to comply with our regulatory obligations. |

Security measures are in place to protect your personal data when you make a booking or enter, submit, or access your personal data using our systems. Your personal data will be stored locally and backed up on secure servers provided by third-party cloud service providers.

If you require any further information, you are welcome to contact us using the details set out above under ***Our contact details***.