

This is the general Privacy Policy for Living Learning Spanish (LLS), operating within Living Learning Languages Ltd., company number 10917541, and for the range of Spanish and English language courses we provide in Spain through [www.livingenglish.com/living-learning-spanish](http://www.livingenglish.com/living-learning-spanish)

At LLS, we collect different types of information about our users for five main reasons:

1. to provide personalised services unique to individual users
2. To help us monitor and improve the services we offer
3. To keep customers up-to-date about the services they have purchased
4. To fulfil contracted services
5. If we have permission from the user, to market products and services to them

**This policy is divided into the following sections:**

1. About us
2. What information do we collect about you and how do we use it?
3. What information do we store?
4. Profiling
5. How long do we keep your data?
6. Use of data about minors
7. Updating your personal information
8. Who do we share data with?
9. Google Analytics
10. Legal information and how to contact us
11. Access to your information
12. Changes to our Privacy Policy

## 1. About Us

(i) 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.

(ii) We will respect your privacy. You should receive newsletters and marketing emails only from us.

(iii) We correspond with you because you are an existing teacher/partner/student/customer or have previously expressed an interest in hearing from LLS. Should you change your mind and no longer want us to contact you, just let us know and we will comply with your instruction immediately.



(iv) We will make it clear at the point we request your information why we are collecting it and how we are going to use it.

(v) 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 your booking or process your event registration.

(vi) We will minimise the amount of information we collect from you to what we need to deliver our services.

(vii) We will be clear in our dealings with you as to what information about you we will collect and how we will use it.

(viii) We will use personal information only for the purposes for which it was originally collected and we will delete it securely when you request this or after a clearly defined timescale.

(ix) Our website and social media channels are accessible via the internet. Please remember that if you post any comments or links on any of our sites that they can be read and accessed by anyone and everyone.

## 2. What information do we collect about you and how do we use it?

- when you contact us for information
- when you work with us in a commercial capacity, either as a teacher or partner
- when you sign up for a newsletter
- when you register for an event (including live streamed events)
- if you book a course of study with us
- when you use the website
- if you choose to reveal information in emails or by posting on social media
- if you enter sales promotions or competitions

Certain services that we provide may involve us collecting extra information (your location or preferred language, for example), so that we can tailor the information we give you better.

### What legal basis do we use for processing your data?

This depends upon the purpose for collecting your data in the first instance.

- For all data collected in signing up for a service such as a newsletter, an event, or requesting information from us, 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 benefit 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.



- Where you provide data in the course of applying to work with LLS or in the purchase of a course of study, we process your data under **Contract**, i.e. your data is necessary for the fulfilment of the service. Any additional contact, i.e. telling you about another product or service closely related to the product or service you have bought is managed under **Legitimate Interest**.
- Any secondary processing of your data, i.e. sharing with 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.

### 3. What information do we store?

**We store the following information about our students, homestay teachers, host families and members of staff as a Data Controller.**

#### **Students**

- Information you supply on booking forms and safeguarding forms
- Feedback from you
- Records of meetings, email, telephone and paper correspondence
- Documents you upload to the LLE Group Portal
- Photographs you send us.

#### **Teachers**

- Information you supply on application forms and on CVs.
- Photographs you provide for your teacher profile
- Confidential written references from referees supplied by you
- Interview notes, home visit notes and records of observations
- Information supplied on your police check (if applicable)
- Feedback from students
- Feedback from you
- Banking information for the purpose of transferring fees to you
- Records of meetings, email, telephone and paper correspondence
- Documents you upload to the LLE Group Portal

#### **LLS Staff**

- Information you supply on application forms and on CVs.
- Confidential written references from referees supplied by you
- Information supplied by the DBS (if applicable)



- Banking information for the purpose of transferring fees to you
- Records of meetings, appraisals, email and paper correspondence
- Documents you upload to the LLE HR Portal

### **Representatives**

- Information you supply on applying to represent Living Learning Languages Ltd
- Written references from referees supplied by you
- Information your students supply on booking forms, safeguarding forms (Young Learners) and travel information forms
- Feedback from your students
- Feedback from you
- Banking information for the purpose of transferring fees to you
- Records of meetings, email, telephone and paper correspondence
- Documents you upload to the LLE Group Portal

### **Educational Tour Operators**

- Information you supply on applying to work with Living Learning Languages Ltd
- Written references from referees supplied by you
- Feedback from you
- Banking information for the purpose of transferring discounts to you
- Records of meetings, email, telephone and paper correspondence
- Documents you upload to the LLE Group Portal

### **We store the following information about Educational Tour Operators' students as a Data Processor**

- Information you supply about your students in your role as **Data Controller** on booking forms, safeguarding forms (Young Learners) and travel information forms
- Feedback from your students
- Feedback from our teachers relating to your students
- Records of meetings, email, telephone and paper correspondence with your students
- Documents you upload to the LLE GroupPortal relating to your students



The minimum information we will need from you to register for our **email newsletters** is your name and email address. We will process data collected for this purpose on the basis of **Legitimate Interest** to deliver the service for which you have registered. We will also, on this basis, contact you occasionally about other relevant services in the Living Learning Group (English/Spanish/Guardianship/Online/Academic) which we think will interest you. You always have a choice and can opt out of processing on this basis at any time by contacting our Database Manager by email or telephone:

info@livingenglish.com	+44 (0) 117 9269400
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## 4. Profiling

From time to time we may use some elements of the data you supply to target the messages we send you. For example, we may use your location to send you information about an event in your country or we may use your company type to send you a relevant news story.

## 5. How long do we keep your data?

Because we collect data for a wide range of purposes, we do not have a singularly defined retention period. 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 or minimised and retained for legal reasons.

## 6. Use of data about minors

We only collect or store any personal information about minors under the age of 18 in the context of a home or online tuition course booking or a host teacher's family. Permission is obtained directly from a legal adult guardian to collect this information.

## 7. Updating your personal information

Under current data privacy 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 Database Manager:

info@livingenglish.com	+44 (0) 117 9269400
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## 8. Who do we share data with?

Your information may be shared with the Living Learning Group of companies that are based in Bristol, UK. For example, when there is a crossover between services.

Your information may also be shared with our teachers, students, educational tour operators, representatives, travel companies or other services necessary for our business operations. These parties are responsible for the security of this data, will not use your data for any other purpose except the purpose for which it was provided, and will not share your data with any third parties.

We may make other organisations' services available (some of whom may be based outside the EEA) although we are not necessarily operating those services. We process any information which we collect when you access a service provided by another organisation under this privacy policy. Information these other organisations collect is governed by their own privacy policies.

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 adhere to data protection and privacy laws which apply. We may also independently audit these service providers to make sure that they meet our standards.

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

We will not share your personal information with others for marketing purposes.

## 9. Google Analytics

We use Google Analytics on our sites for anonymous reporting of site usage. If you would like to opt-out of Google Analytics monitoring your behaviour on our sites, please use this link: <https://tools.google.com/dlpage/gaoptout>

## 10. Legal information and how to contact us

Under the currently applicable laws we have to say who the data controller is for Living Learning Languages services. The data controller is the organisation responsible for protecting information and, in our case is Living Learning Languages Ltd.

**Data Protection Officer :** Data Oversight Ltd; [info@dataoversight.uk](mailto:info@dataoversight.uk); tel: 020 3858 0692





## 11. Access to your information

If you would like access to or a copy of the personal information we hold about you, to request a correction, or have any questions about how we may use it or to make a complaint, please contact the Data Manager by email or telephone.

info@livingenglish.com	+44 (0) 117 9269400
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Requests will be dealt with by the Data Manager, and will be responded to within a reasonable period, not longer than 30 days.

If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority – details of which are given below:

Information Commissioner's Office

<https://ico.org.uk/concerns/>

Tel: +44 303 123 1113

## 12. Changes to the privacy policy

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.

Changes to this policy by date

Date	Changes
17.05.2018	New company Privacy Policy created

