

Mayfair School of English Privacy Policy

1 Policy statement

- 1.1 Mayfair School of English is committed to protecting your privacy. We take the privacy of all our clients, staff and site users seriously and do our best to protect your personal information.
- 1.2 In the course of our activities we will collect, store and process personal data about students, staff and other third parties.

The current policy governs:

- All the processing stages of information (from collection, use, transfer, storage and deletion) of personally identifiable information (the information that may be used to identify a physical person) and any information associated with that person eg financial.
 - The management of data collected from people in any country and through any means, including online.
- 1.3 All staff must comply with this policy whenever they are involved in processing personal data. Any breach of this policy may result in disciplinary action.

2 About this policy

- 2.1 The personal data that MSE may need to handle includes information about current, past and prospective students, current and former staff, homestay families including other residents in their home, and some other third parties. The personal data, which may be held electronically or in paper versions, is subject to the legal safeguards specified in the Data Protection Act 1998 and, from 25 May 2018, the General Data Protection Regulation (collectively, the Data Protection Legislation).
- 2.2 This policy sets out rules on data protection and the legal conditions that must be satisfied whenever handle personal data.
- 2.3 The nominated Data Controller (Principal) is responsible for ensuring compliance with GDPR Legislation and with this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to the Principal

By visiting www.mayfairschool.co.uk you are accepting and consenting to the practices described in this policy.

Any question regarding our processing of personal data may be directed to: enquiries@mayfairschool.co.uk

Please read the document so that you fully understand how MSE manages your personal data.

3 Data Protection Principles

Anyone processing data must comply with the data protection principles. Personal data must be:

- (a) Processed in line with the data subjects' rights in an appropriate way
- (b) Collected for the purpose specified only or, if for any other purposes, with prior consent
- (c) Adequate, relevant and not excessive for the purpose
- (d) Accurate and up to date
- (e) Kept only for as long as necessary for the purpose
- (f) Protected and not shared with third parties
- (g) Kept secure

3.1 Collecting personal information

GDPR Legislation ensures that personal data processing is done fairly and without adversely affecting the rights of the data subject.

Personal data should be processed on the basis of one of the legal grounds set out in the Data Protection Legislation. These include:

- Consent must be given by the data subject to the processing
- The processing is necessary for the fulfilment of a contract with the data subject
- Compliance with a legal obligation to which the data controller is subject
- For the legitimate interest of the data controller or the party to whom the data is disclosed.

Whenever special categories of personal data or information about criminal offences (such as DBS checks) are being processed, additional conditions must be met.

Personal data is sometimes collected with prior consent from persons visiting or phoning the school or electronically through visits to our website for the purposes outlined below.

3.2 Processing for Limited Purposes

In order to provide services, we may collect and process personal data for a variety of purposes, including: enrolment of our students, administration of our courses, provision of suitable homestay accommodation, recruitment of staff and staff administration, and compliance with our legal obligations.

Personal data may include information we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and information we receive from other sources (including, for example, business partners, subcontractors in technical, payment and delivery services, the Disclosure and Barring Service and others)

We will only process personal data for the specific purposes set out in this policy or for any other purpose permitted by the Data Protection Legislation. We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter. Further

information about how we process personal data relating to our staff is contained in our Staff Handbooks.

3.3 Notifying data subjects

If we collect personal data directly from data subjects, we inform the data subject of the purpose(s) for which we intend to process that personal data, the third parties with whom we may share the data and the existence of rights for data subjects.

If we receive personal data about a data subject from other sources, we will provide the data subject with this information as soon as possible thereafter.

We will inform data subjects whose personal data we process that we are the data controller with regard to that data.

3.4 Adequate, relevant and non-excessive processing

We will only collect personal data that is required for the purpose specified to the data subject.

3.5 Accurate data

We will ensure that personal data we hold is accurate and kept up to date. Accuracy of any personal data is ensured at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

3.6 Timely processing

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

3.7 Processing in line with data subject's rights

We will process all personal data in line with data subjects' rights as summarised below:

- A subject may request access to any data held about them by a data controller. The Data Protection Act 1998 (the "Act") gives data subjects the right to access information held about them. This is subject to a fee of £10 to meet our costs for providing this.
- A subject may prevent the processing of their data for direct-marketing purposes and request that any inaccurate personal data about them is corrected.
- They may request that we stop using their personal information for certain purposes.
- Personal data must be provided in a portable format and deleted on request by the data subject.
- Decisions about them should not be made by wholly automated means

Some of the rights listed above are limited to certain defined circumstances and we may not be able to comply with requests.

If a data subject is unhappy with the way we are processing or have processed their personal data, they have a right to complain to the Information Commissioner's Office. More information about this can be found at: <https://ico.org.uk/concerns/>

3.8 Security of data

MSE will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

- A data processor will agree to comply with the procedures and policies in place that protect the rights of the data subject.
- We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows: (a) Confidentiality means that only people who are authorised to use the data can access it. (b) Integrity means that personal data should be accurate and suitable for the purpose for which it is processed
- Only authorised users will be able to access the data if they need it for authorised purposes. **Personal data should therefore be stored on our central computer system instead of individual PCs.**
- Security procedures include: (a) Access to data by authorised persons only
- Secure lockable desks and cupboards to be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)
- Paper documents should be shredded.
- Digital storage devices should be physically destroyed when they are no longer required.
- All computer users must ensure that monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended

3.9 Transfer of Personal data to a country outside the EEA

We may transfer any personal data we hold to a country outside the European Economic Area (EEA), provided that one of the following conditions applies:

(a) The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms.

(b) The data subject has given his consent.

(c) The transfer is necessary for one of the reasons set out in the Data Protection Legislation, including the performance of a contract between the school and the data subject, or to protect the vital interests of the data subject.

(d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.

(e) The transfer is authorised by the relevant data protection authority and where the data subject's rights are safeguarded.

(f) Subject to the requirements listed above, personal data we hold may also be processed by employees operating outside the EEA who work for us or for one of our suppliers.

3.10 Disclosure and sharing of personal information

We may share personal data we hold with any member of the company.

We may disclose personal data we hold to a third party should they acquire the business, in which case we may disclose personal data we hold to the prospective buyer of such business or assets.

We may disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to apply any contract with the data subject; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging

information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may also share personal data we hold with selected third parties for the purposes set out in this policy.

We will only disclose personal data to a person or persons who are entitled to it. We will ask for a written request for personal data and verify the caller's identity and entitlement to information before disclosing it. Any request for personal data should be forwarded to the Principal immediately.

3.11 IP Addresses and Cookies

MSE and its subsidiaries (*Mayfair School, Mayfair Educational Group, MSE*) use cookies on the websites, applications, advertisements and related services, including emails, newsletters and on certain partner and licensee websites that we do not own or operate but with whom we have agreements.

We collect information from you, in the form of your personal details, when you contact us for help and when you complete an online form on the school website. Whenever you visit our website the following information is automatically collected:

- Technical information, including (where available) your IP address, operating system and browser type, for user analysis: statistical data about the user's browsing patterns, and which does not identify any individual, unless that information has been given by a user with informed consent
- Information about your visit, including the full URL clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Cookies

Cookies are small bits of text that are downloaded to the devices you use to reach and use the Service. Your browser or device holds these cookies and makes them available every time you visit a site again so that it can recognize you and remember important information.

Cookies help us to improve our website and to deliver a better and more personalised service. In summary, the cookies we use enable us:

- To estimate our general audience size and how they use our site
- To recognise you when you return to our site
- To store information about your preferences to allow us to customise our site according to your individual interests
- To speed up your searches

We will also permit certain third parties to collect cookies during the time you use our website. In summary, the cookies will enable us to:

- Track the first and last pages you visit and your total number of visits to the website
- Track how long you spend on any page existing within our website
- Track how you have been visiting the website
- Track how you came to access the website including any keyword searches, search engine information or referrer
- Track the resources that you access.

Cookies Used by MSE:

Essential Cookies or Strictly Necessary Cookies: These cookies are essential to the Service in order for you to move around the Service and to use its features. No information about your browsing habits is gathered by these cookies.

Session Cookies are temporary cookies that remain in your browser or device until you leave the site. They are then deleted from your device once you leave the Service.

Persistent Cookies remain in your browser or device for much longer, depending on the cookie. You can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. Some browsers provide a mode where cookies are always deleted after a visit.

Analytics Cookies: Analytics Cookies allow us to improve our services by collecting information about your use of the Service. We use these cookies to help improve how the website works. We can't identify you personally through the use of these cookies; we just use them for statistics.

Third Party Cookies: Some of the cookies on the Service are operated by third parties, such as Twitter, YouTube or Facebook and it is not possible for us to manage these cookies. Please check the websites of those third parties for details on how they use cookies.

4 Changes to our Privacy and Cookies Policy

Any changes we may make to our Cookies Policy in the future will be posted on this page. Please check this page from time to time to ensure that you are aware of any changes to our Privacy and Cookies Policy. Your continued use of this website will be deemed to signify your acceptance to any changes to our Privacy and Cookies Policy.

5 How we use your personal information

The personal information we collect from you is used by the school to help us provide a service which is suited to your needs and preferences.

The school will:

- Create a profile for you

- Present the information in the most suitable way to suit your needs and the technology you use
- Occasionally send you newsletters, updates and information on products and services that you have an interest in and only where you have consented to be contacted for such purposes
- Allow you to participate in interactive features of our service, when you choose to do so.

The school may also:

- Use the information collected for data analysis, tests and research so that we can ensure that the content is presented in the most effective manner for you and for your computer as part of our efforts to keep our site safe and secure.
- Disclose your information if required to do so by law.

The school will not:

- Share your personal information for direct marketing purposes.

6 Opting Out and Deletion of Data

Personal Information

Your personal information provided for contact purposes (name, address, telephone number, email) may be removed from our database at any point on request.

Financial information

Any financial information relating to your bank, credit card or debit card will be treated confidentially and will not be retained once a payment is made. All payments are processed securely.

7 Terms of Use

7.1 Intellectual Property Rights

Unless otherwise stated, we are the owner or the licensee of all intellectual property rights in our site, and in the material published on it. Those works are protected by copyright laws. All such rights are reserved.

All materials on this site, including but not limited to images, artwork, text, audio clips, and video clips, are, unless otherwise stated, owned and controlled by us and may not be copied, reproduced, republished, uploaded, posted, transmitted or distributed in any way. Modification of the materials or unauthorized use of the materials for any purpose is a violation of our legal rights.

7.2 Acceptable Use

You may only use our site for lawful purposes. You may not use our site:

- In any way that breaches any local, national or international law or regulation.
- For unlawful or fraudulent purposes.
- To knowingly transmit any harmful programs that adversely affects the operation of any computer software or hardware.
- Not to reproduce, duplicate, or copy any part of our site without our express permission.
- To transmit any unsolicited or unauthorised advertising or promotional material or any other form of similar solicitation (spam).

7.3 Links

Our website may contain links to and from websites operated by individuals and companies over which we have no control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8 Changes to our Privacy Policy

Any amendments to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy. Contact, questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@mayfairschool.co.uk

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Glossary: Data protection terms

- 1 Data is information which is stored electronically or in certain paper-based filing systems.
- 2 Data subjects for the purpose of this policy include all living individuals about whom we holds personal data.
- 3 Data subject: person whose data is collected; they need not be a UK national or resident.
- 4 All data subjects have legal rights in relation to their personal information.
- 5 Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.
- 6 Data controller is the organisation which determines the purposes for which, and the manner in which, any personal data is processed. A data controller is responsible for establishing practices and policies in line with the Data Protection Legislation. We are the data controller of all personal data used in our business for our own purposes.
- 7 A data processor is an employee who processes personal data on behalf of the school.
- 8 Processing describes any activity that involves use of the data, including obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- 9 Special categories of personal data include information about a person's racial or ethnic origin, religious and political beliefs, trade union membership, physical or mental health or condition or sexual life. Special categories of personal data can only be processed with the express permission of the person concerned. Information relating to any offence committed or alleged to have been committed is subject to the same condition.

Summary for students

The above policy says how Mayfair School collects, uses and protects your personal data:

Mayfair School will comply with the new data protection principles as follows:

- Personal data will only be collected for the purpose of setting up a contract for our services.
- It will only be collected and used only with your consent.
- Your data will be protected, kept secure and not shared with any third parties or used for marketing.
- It will only be kept for as long as necessary.
- You have the right to have your data deleted at any point.
- You may contact the school if you have any questions regarding your personal data.