



Privacy Policy

English in Chester (**we, us, our, the school**) is committed to protecting and respecting your (**you, your**) privacy. We take the privacy of all of our customers and other users seriously and take great care to protect your personal information.

Company Information

English in Chester
9-11 Stanley Place
Chester
CH1 2LU
Telephone: +44 1244 318913
Email: data@english-in-chester.co.uk

Privacy & General Principles

Our Privacy Policy governs any kind of processing where we are acting as a data controller or co-controller (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons. This policy applies to our processing of data collected through any means, actively as well as passively from persons located anywhere in the world. Any question regarding our processing of personal data may be directed to data@english-in-chester.co.uk.

Please read the following policy carefully to understand what information we may collect from you, how we may use it, and your rights in respect of our use.

We will be guided by the following principles when processing data:

- We will only collect data for specific and specified purposes; we will make it clear at the point when we request your information, what we are collecting it for and how we are going to use it.
- We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required.
- We will collect and use your personal information only if we have sensible business reasons for doing so, such as managing a booking or gathering necessary information about a new member of staff, ETO or homestay.
- We will not use data for purposes other than that for which the data was collected, except as stated herein, or with prior consent;
- We will seek to verify and/or update data periodically, and we will accept requests for amendments of personal data;
- We will apply high technical standards to make our processing of data secure;
- Except when stated herein, we will not store data in identifiable form longer than is necessary to accomplish its purpose, or as is required by law.



Information collected

We collect information on you:

- When you apply to join a course or programme at the school
- When you contact us for information, via our website, by email, by phone, in person or via social media channels.
- When you work with us in a commercial capacity (for example as an ETO or partner)
- When you apply to be a homestay
- When you apply to work at English in Chester, and when you are subsequently employed by English in Chester
- When you sign up for lessons or a newsletter or subscribe to other services
- When you add information about your studies and experience through e-Chester, and when you give us feedback about your experience of English in Chester.
- When you use our website.
- If you post on our social media channels or on our website or blog

Legal bases for processing your data

The General Data Protection Regulation (GDPR) establishes 6 legal bases on which we can process your data: these are Consent, Contract, Legal Obligation, Vital Interests, Public Task and Legitimate Interests. For further information about these legal bases and fuller definitions, please refer to the [ICO website](#)

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

1. Booking a course at English in Chester

For all data collected as part of the process of enquiring about, applying for and booking a course or for any other related service (e.g. homestay, airport transfer, social programme, insurance to cover you during your stay, access to our online study portal e-Chester, managed via Guided e-Learning), or where you give us feedback about aspects of this provision, we process using Contract or Legitimate Interests, namely the fulfilment of the booking. This may include sharing personal data with our **trusted partners** such as Educational Tour Operators (ETOs), Government Agencies, Schools, insurance companies, Guided e-learning, homestay and other accommodation providers and activity and transport providers.

Where required by law to do so, we may also process your data under Legal Obligation.

Where we collect data about our clients' health, this is managed under Consent. This data is shared internally and with transport and homestay providers only when necessary and appropriate.

2. Other services and uses of clients' personal data

Any processing of customer data not directly related to the fulfilment of a booking or related services, such as signing up for newsletters or free lessons on our website, or sending messages to you on behalf of third parties, is managed under Consent. From time to time, we may use elements of the data you supply to target the messages we send to you. For example, we may use your location to send you information about an event or opportunity happening in your area.

During your stay at English in Chester, we may take photographs or videos of you, and the use and processing of these is also managed through Consent.



3. English in Chester and commercial partners in the UK and overseas

For all data collected as part of managing our relationship with commercial partners, such as ETOs, Government Agencies and Schools, we process using Legitimate Interest and Legal Obligation, namely the maintenance of the commercial relationship. This may include the secure sharing of some of the personal data of employees of our commercial partners with professional colleagues in other schools or associations for the purposes of developing the commercial relationship.

As newsletters to commercial partners are an important part of how we communicate with them, these are managed under Legitimate Interest.

English in Chester and our ETOs and other commercial partners (for example schools, government and national sponsors) are Joint Controllers of personal data relating to the process of marketing and booking our commercial partners' clients.

We advise all clients to read our Privacy Policy, but also the Privacy Policy of the ETO or school to whom they give their data in their country.

When we transfer additional personal data, such as homestay information, to our commercial partners, this will be limited to data necessary for the performance of a contract made in the interests of the individual (which is an exemption to the 8th principle of the GDPR legislation). Through our contract with them, we require all of our commercial partners overseas to confirm that they will process this data securely in line with the requirements of GDPR or the equivalent in their country.

We remain responsible for the data held, processed or sent via our systems.

We do not sell personal data at any time.

4. English in Chester staff and personal data

For all data collected as part of the process of employing and managing staff, we process using Contract, Legal Obligation and Legitimate Interests, namely the employment of the employee. This will include data required for HMRC, pensions, insurance (including staff health insurance cover).

As newsletters to our staff are an important part of how we communicate with them, these are managed under Legitimate Interest.

When we take photographs or videos of staff, the use and processing of these for marketing purposes is managed through Consent.

5. English in Chester and homestay and accommodation providers

For all data collected as part of the process of recruiting and managing homestay providers, we process using Legitimate Interest, namely the maintenance of the relationship with the homestay. We send personal data about our homestays to students and ETOs and other trusted partners so that they know where to go on arrival in the UK and also are able to make contact with their homestay prior to arrival or if there is a problem. This may include photos and/or videos of our homestay providers.

Homestay and other accommodation providers receive basic information about students who are going to stay with them. This is limited to the information required to process the accommodation booking, and English in Chester remains the controller of this personal data and requires accommodation providers to dispose of it securely when it is no longer required for this purpose.

As newsletters to homestays are an important part of how we communicate with them, these are managed under Legitimate Interest.



When we take photographs or videos of homestay providers, the use and processing of these for marketing purposes is managed through Consent.

6. Defence of legal claims

We may process any of the personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is Legitimate Interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

7. Insurance, managing risks and obtaining professional advice

We may process any of the personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is Legitimate Interest, namely the proper protection of our business against risks.

- We will make it as easy as we can for you to opt out of unwanted processing under Consent, providing it does not restrict our ability to provide you with the primary service you have requested.
- We collect data for a wide range of purposes. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or pseudonymised and/or minimised and retained.

Special Category Data/Criminal Record Data

We may request health data from potential students and employees. This data has special protection in the GDPR under the specific conditions listed in Article 9 (2) of the GDPR that processing is necessary either to protect the vital interests of the data subject, (or of another natural person where the data subject is physically or legally incapable of giving consent), or where processing is necessary for the purposes of preventive or occupational medicine or the assessment of the working capacity of an employee. We share health data about clients with trusted partners only when necessary and appropriate where we have consent to do so.

The school has safeguarding responsibilities and carries out DBS checks on all staff and other people who are likely to have direct supervisory responsibility for or unsupervised contact with young people under the age of 18. We may process and record securely risk assessments of these DBS checks where the disclosure is not clear. These risk assessments will be disposed of securely when that person no longer has supervisory responsibility or unsupervised contact with young people under the age of 18 on behalf of the school.

Children under 18

We collect or store personal information about children under the age of 18 in the context of managing bookings and directly related products, and for safeguarding purposes. Permission is obtained directly from a legal adult guardian to collect this information through our Parental Consent Form. As part of this process, we request special category data relating to the health of the child, which we manage through Vital Interest.

We also gain consent from parents for the use of photos or video taken during their child's stay at English in Chester through the Parental Consent Form.



Information collected via our website

How we will use information collected by our website

We may use information held about you in the following ways:

- To process a booking for one of our courses or products
- To manage an application to work for the school, or to be a homestay.
- To create a profile for you to help us provide a more personalised service which is suited to meet your preferences.
- To ensure that content from our site is presented in the most effective manner for you and your computer.
- To send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

Links from our website

Our website contains links to and from websites operated by individuals and companies over which we have no direct 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. We advise you to check these policies before you submit any personal data to these websites.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use a single cookie, "sessionid", to identify you when you visit our website, keep you logged in as you navigate our website, and store temporary information during the course application process. This functional cookie does not identify any individual, and is required for the correct operation of our website.

Our service providers use cookies and those cookies may be stored on your computer when you visit our website. These cookies do not contain any information that is personally identifiable to you. Our service providers are listed below - click to view their privacy policies:

- [Google Analytics](#) - used to analyse the usage of our website.
- [Google Translate](#) - provides a translation service to our website visitors.
- [Facebook](#) - used to offer "like" and "share" buttons to like/share pages from our website on Facebook.
- [Twitter](#) - used to offer "follow" buttons to follow English in Chester on Twitter.
- [LinkedIn](#) - used to offer "follow" buttons to follow English in Chester on LinkedIn.
- [AddThis](#) - used to offer "share" buttons for various social networks.
- [YouTube](#) - used to embed videos on our website.
- [LiveChat](#) - provides a chat service to our website visitors.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);



- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

Personal Information and your rights

You have the right to rectify, erase or restrict the processing of your data subject to the exceptions outlined in this policy. You also have the right to withdraw consent to the processing of information for which you have previously given consent. You can contact us at any time to have these details removed from our database or to update this information, subject to satisfactory proof of your identity. You can read more about your individual rights on the [Information Commissioner's Office website](#).

You may also request access to the data we hold on you. Provision of such information will be subject to:

- a) The payment of a fee (currently fixed at £10)
- b) The supply of appropriate evidence of your identity.

We may withhold personal information that you request to the extent permitted by the law.

To make any of these requests relating to your personal data, please contact us at:

data@english-in-chester.co.uk

or contact the Finance and Operations Manager (tel: +44 1244 318913)

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on our website in this document. Please check from time to time to ensure that you are aware of any changes to our Privacy Policy. If we are required to by law, we will obtain your consent to make these changes. Your continued relationship with us will be deemed to signify your acceptance to any changes to our Privacy Policy.

Staff and Privacy

Any wilful breach of this policy by staff will be regarded as a disciplinary offence and will be dealt with under the school's formal disciplinary procedures.

Legal information and how to contact us

Any request for information (personal information, requesting a correction, or to make a complaint) should be addressed in the first place to our Data Manager, who is our Finance and Operations Manager. She can be contacted at data@english-in-chester.co.uk, or on +44 1244 318913.

If you are not satisfied with the way your request is handled, you have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office.

English in Chester's registration number with the Information Commissioner's Office is Z7642974.

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

Tel: +44 303 123 1113

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