

## **Privacy Policy**

At ACCORD ISS, we take data privacy seriously and we process your personal data or that of your children in compliance with the General Data Protection Regulation (GDPR).

We thank you for reading the following privacy policy carefully to understand why we may collect from you, how we may use it, and your rights in respect of our use.

We collect, store and use personal data relating to any course you book with ACCORD ISS, 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 educational travel operator or partner), when you apply to work at ACCORD ISS, and when you are subsequently employed by us, and if you post on our social media channels or on our website or blog.

### **1. What personal data do we collect from you?**

1. Contact details (including your full name, address, date of birth, email address, telephone numbers, passport number, emergency contact details)
2. Photographic identification
3. Course and language level details, attendance records
4. Medical details, health or dietary information
5. Professional information, such as job title, employment history, professional experience, national insurance number, criminal check
6. Banking and financial details

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 to collect and store data of students under the age of 18 is obtained directly from the child's parents or legal guardian through our booking form and parental consent form.

We also ask permission from parents for the use of photos or videos taken during their child's stay at ACCORD ISS.

Where necessary to act in the child's best interests, we may need to process personal data which is very sensitive in nature such as diversity and health related details. We may also need to share this information with third parties, for example health and social care professionals, a court or other regulatory bodies. If you volunteer sensitive personal data, you will be allowing us to process it as part of engaging our services.

### **2. Who has access to your personal data?**

We are committed to restricting access to personal data to just those individuals who may need it to meet their or the school's obligation. This means the following may have access to some or all of your data: the Directors of the School, the Registration department, the Marketing department, the Finance department, the Academic staff, the Summer Schools staff.

### **3. Who do we share your personal data with outside of the school?**

So that we can fulfil our regulatory and contractual obligations, we need to share your personal data with third parties outside our School. We have also chosen to outsource some of our operational requirements and our outsourced suppliers also need access to your personal data. In all cases, we have committed to limiting the personal data that we share to only that which is necessary for them to be able to carry out the function we have contracted with them to perform.

We take your privacy seriously and will never sell your personal data to anyone and will take precautions to keep it secure. Your data may be shared with:

- Quality Standard Inspectorates such as the British Council
- Government Enforcement Agencies such as the Home Office, Immigration, the Health & Safety Executive, the Police
- Educational Travel Operators
- Taxi and airport transfer providers

### **4. What do we do with your personal data?**

We use your personal data to:

- Respond to your enquiries
- Prepare and send documentation about the course booked with ACCORD ISS
- Send financial documents such as invoices and collect payments from you
- Send general communications about the course booked with ACCORD ISS
- Send marketing communications about ACCORD ISS by post or email.
- Verify your identity and establish the source of funding in any transaction.
- Carry out appropriate anti-fraud checks (by conducting online searches using a third-party identity provider). Please note that this will not affect your credit rating.
- For statistical purposes.
- Seek advice from third parties in connection with the services we provide.
- Respond to any complaint against us.
- Prevent money laundering or terrorist financing in accordance with financial crime regulations.
- Improve the products and services we provide.

If you no longer wish to remain on our mailing list for marketing communications you can opt out any time by emailing [info@accord-iss.com](mailto:info@accord-iss.com)

### **5. How do we secure your personal data?**

We take reasonable steps to prevent the loss, misuse or alteration of your personal data. We store information you provide on our secure servers. All electronic transactions and communications you send to or receive from us are encrypted using SSL technology. We cannot guarantee the security of data sent over the internet as it is inherently insecure.

### **6. How long do we keep your personal data for?**

We will retain all your personal data for the duration of your contract and then for a further 5 years to enable us to meet our regulatory and legal obligations, to ease administration for returning students and to keep you up to date with news from ACCORD ISS. After 5 years all records will be deleted.

### **7. 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.

## Special Category Data/Criminal Record Data:

We may request health data from potential students and employees. This data has special protection under 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.

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.

### **8. Children under 18**

We collect and/or store personal data about children under the age of 18 when managing bookings and directly related products, and for safeguarding purposes. We obtain permission directly from the parents or legal adult guardian to collect this information through our Parental Consent Form and Booking form.

We also obtain consent from parents for the use of photos or videos taken during their child's stay at ACCORD ISS through the Parental Consent Form and Booking Form.

### **9. How do we use data collected via our website?**

We may use information held about you:

- To process a booking for one of our courses or products
- To manage an application to work for the school.
- To ensure that content from our site is effectively presented for you
- To send 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 notify you about changes to our service.

### **10. Controlling information about you**

If you have agreed that we can use your information for marketing purposes, and you change your mind: you can send an email to us or write to us.

We will never lease, distribute or sell your personal information to third parties unless we have your permission or we are required to disclose your personal details by law.

### **11. Contact**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Privacy Officer at [info@accord-iss.com](mailto:info@accord-iss.com).

You can also contact the Information Commissioner's Office <https://ico.org.uk/concerns/> , call 0303 123 1113 or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

These policies are regularly reviewed and will be updated as and when is necessary.