

Policy Statement – Privacy

General Principles

Everyone has rights about how their personal information is handled. During our activities we will collect, store and process personal information about our staff, suppliers, clients (Educational Tour Organisers and students), accommodation providers (hotels and homestays), for example, and we recognise the need to treat it in an appropriate and lawful manner.

Our Privacy Policy governs any kind of processing where BLC International (BLCI) is acting as a data controller or co-controller of personally identifiable information 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.

Contact info@brightonlc.co.uk for any questions about our processing of data.

We will be guided by the following principles when we process data:

- We will process your data fairly and lawfully.
- We will only collect and process 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 only collect the data that is necessary to complete the services requested. We will not collect more data than is necessary
- We will ensure that your data is accurate. From time to time, we may ask you so that we can check or update your information
- 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 not keep your data longer than we need to.
- We have strong systems and procedures in place to make sure your data is secure.
- We will not transfer data to third parties or across borders except for the purposes specified below.

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 BLCI, and when you are subsequently employed by BLCI
- When you sign up for a newsletter or subscribe to other services

- When you use our website including the Live Chat facility
- If you post on our social media channels or on our website or blog
- When you use our Wi-Fi network in the schools
- Through CCTV when you pass entrances into schools or use the car parks

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* (i.e. for processing the data beyond the original purpose for which it was collected for, example to send you marketing information about our courses or to ask permission to use your photo in our promotional materials)
- *Contract* (i.e. to fulfil a contract, for example to provide a quote for a course for a student or employment for a teacher)
- *Legal Obligation* (i.e. where we have a legal obligation to provide data e.g. to the Home Office for students with visas or HMRC regarding employee salaries)
- *Vital Interests* (i.e. to save someone's life)
- *Public Task* (this covers mainly public authority and is not a basis BLC normally uses)
- *Legitimate Interests* (where we need to process data to best carry out our business e.g., CCTV for staff student/protection, fraud detection, HR background checks).

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:

For all data collected as part of the process of enquiring about, applying for and booking a course or for any other related or where you give us feedback about aspects of this provision, we process using Contract or Legitimate Interests. This may include sending of your data to our 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.

Any processing of customer data not directly related to the fulfilment of a booking or related services such as signing up for newsletters 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 BLC international, we may take photographs or videos of you, and the use and processing of these is also managed through Consent.

For all data collected as part of managing our relationship with commercial partners, such as ETOs, government agencies and schools, we process using Contract, Legitimate Interest and Legal

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

For all data collected as part of the process of employing and managing staff, we process using Contract, Legal Obligation and Legitimate Interests. 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.

For all data collected as part of the process of recruiting and managing homestay providers, we process using Contract, Legal Obligation and Legitimate Interests. 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 can contact 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 we remain 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.

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.

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.

We are co-processors of information relating to marketing and booking clients with partners overseas (for example ETOs, schools, government, and national sponsors).

As such, we may transfer some data outside of the EU, but 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). We remain responsible for the data held, processed, or sent via our systems. We are not responsible for the security and processing of data which is held, processed, or sent via our partners' systems. However, we require all our partners overseas to confirm that they

will process data securely in line with the requirements of GDPR or the equivalent in their country. We do not sell your data at any time.

Special Category Data/Criminal Record Data

We may request health data from potential students and employees. This data has special protection under the GDPR and is subject to Consent and 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 may share health data 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 securely record 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.

Information collected via our website

We may use information collected by our website:

- 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

This Website contains links to other websites which are not under the control of and are not maintained by us. These links are provided for your convenience only and we are not responsible for the content or availability of those sites. They will have their own privacy policies and terms of use policies which you should check before submitting your personal data.

Cookies

We use cookies on our website so that we can provide you with a good user experience and so that we can develop and improve our website. If you continue to browse our website, you are agreeing to our use of cookies.

What are cookies?

A cookie is a small text file (often including a unique identifier of letters and numbers). We send these to your browser from our website and they are then stored on your computer's hard drive, mobile device, or tablet. A Cookie stores a small amount of data about your visit to our website on your computer. These cookies do not contain any information that is personally identifiable to you but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Why do we use cookies?

We use the following cookies:

- Essential cookies: These are cookies that we need for our website to operate well. They include, for example, cookies that enable you to log into secure areas of our website, use our booking wizard or make secure online payments.
- Analytical cookies: We use Google Analytics to track how visitors use our website – for example which pages are more popular and which countries visitors come from. This helps us to improve how our website works, for example, by making sure that users can easily find what they are looking for. [Google Analytics](#) - used to analyse the usage of our website.

Third Party Cookies

Social Media Cookies - When you share a page by using a social media sharing button (e.g., Facebook, Twitter) on this website, the third-party social media website will use a cookie to enable this function.

Live Chat Cookies – when you use the Live Chat function, [Live Chat](#) uses cookies to improve their service and recognise previous use.

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:

[Chrome](#)

[Firefox](#)

[Opera](#)

[Internet Explorer](#)

[Safari](#)

[Microsoft 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.

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 have also have the right to request a copy of the information that we hold about you. We will provide this data to you:

- within 28 days of receipt of the request
- subject to satisfactory proof of your identity

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

How to contact us about your data

Please contact us if you have any questions about our privacy policy or information, we have about you:

- by email: info@brightonlc.co.uk
- by post: BLC International, 7 Old Steine, Brighton, BN1 1EJ

Changes to our Privacy Policy

We may update our policy from time to time. Please check this page periodically so that you are aware of any changes. You will be notified in advance where we are required by law to get your consent to make 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.

GF/LK/YK