



## Privacy Policy

The English Network (TEN) (**we, us, our**) 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

The English Network  
c/o English in Chester  
9-11 Stanley Place  
Chester  
CH1 2LU  
Telephone: +44 1244 318913  
Email: [karen@theenglishnetwork.com](mailto:karen@theenglishnetwork.com)

### 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 in the first instance to [karen@theenglishnetwork.com](mailto:karen@theenglishnetwork.com)

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 and planning a familiarisation trip for ETOs.
- 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 TEN familiarisation trip.
- 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 sign up for a newsletter or subscribe to other services.
- 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:

- For all data collected as part of the process of enquiring about, applying for and booking a familiarisation trip or for any other related service such as airport transfers and accommodation. We process this information using Legitimate Interest. This may include sending your data to trusted partners including other members of the familiarisation trip. We will securely destroy all personal information after the event apart from basic records of who has participated in events for future planning purposes. When required by law to do so, we may also process your data under Legal Obligation.
- For all data collected as part of the process of registering TEN member staff for events such as conferences and meetings, we process this information under Contract. We will use your data to manage the event booking and share it with TEN member staff at schools involved in the delivery of the event, accommodation providers and transport providers as appropriate. We will securely destroy all personal information after the event apart from basic records of who has participated in events for future planning purposes. When required by law to do so, we may also process your data under Legal Obligation.
- Signing up for newsletters on our website 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. If you visit us, 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, 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.

- We may process any of your 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.
- We may process any of your 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 organisation 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 not responsible for the security and processing of data which is held, processed or sent via our partners' systems. However, we require all of 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.

### **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 book you on to a familiarisation trip or other marketing event organised by TEN.
- 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. These may include SurveyMonkey, Eventbrite and members of TEN. 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. 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.
- [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 TEN on Twitter.
- [LinkedIn](#) - used to offer "follow" buttons to follow TEN 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 in the first instance at:

[karen@theenglishnetwork.com](mailto:karen@theenglishnetwork.com)

(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.

### **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 [karen@theenglishnetwork.com](mailto:karen@theenglishnetwork.com). She can also be contacted 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. However, TEN is a not-for profit organisation that qualifies for exemption from registration with the ICO, so is not registered.

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

Tel: +44 303 123 1113

Updated 31<sup>st</sup> May 2018