

PRIVACY NOTICE

This policy explains who we are and the what, how and why of the information we collect when you visit our website, use our services or communicate with us. It also explains the specific ways we use and disclose that information. We take your privacy seriously and hope this policy provides assurance that your information is safe in our hands.

We're Group Study Holidays (GSH) Limited; a limited company registered in England and Wales under No. 9660364. You may know us as ABC Languages Cambridge – this is our trading name and not our legal identity. Group Study Holidays (GSH) Limited is the Data Controller responsible for the collection, use, storage, sharing and protection of your information if you visit our website, use our services or communicate with us.

Here, we'll explain what to expect when we collect personal information – data that says something about you as an individual. It applies to information we collect about:

- visitors to our website;
- people who request information about our services;
- people who register for our courses;
- people who subscribe to our marketing updates or request materials;
- people who apply to and work with us to provide accommodation to our students;
- People who apply to work with us an agent partner;
- job applicants and our current and former employees

VISITORS TO OUR WEBSITE

When someone visits www.abclanguages.com we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to help us to better understand our markets, how users navigate and use our website, and to better tailor the information we provide to the needs of our visitors. This information is processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find the identities of those visiting our website.

There are areas of our website where we do collect personally identifiable information. This is in areas such as our course registration, contact, placement test, agent registration and post-course feedback pages. We're always upfront about this, will always ask for your consent when collecting personally identifiable information, and will explain what we intend to do with it.

Our use of cookies

You can read more about how we use cookies on our [cookies page](https://www.abclanguages.com/cookies)
<https://www.abclanguages.com/cookies>

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Social Media

We manage our social media channels (YouTube, Instagram, Facebook, LinkedIn and Twitter) and interactions in-house. All interactions are stored within the platforms themselves. We see all this information and decide how we manage it. For example, if you send a message via social media that needs a response from us, we may process it in the same way as we do email correspondence.

Security and performance

We use Secure Sockets Layer (SSL) as a cryptographic protocol to provide security over internet connections. This can be identified by the <https://> prefix on our web address and by a padlock symbol in the browser bar. It helps to secure the interactions that take place on our website, and between our site and a visitor's device.

Web platform

We use a third-party service, Weebly Inc, to build and manage our website, www.abclanguages.com. Weebly provides us with the online platform that allows us to promote our services over the internet and to provide these services to you. Your information, including personal information, may be stored through Weebly's servers. When providing personal information via our contact and other web-forms, we always ask for your consent. Weebly's collection, disclosure, storage, and use of your personal information is in accordance with Weebly's privacy policy available at <https://www.weebly.com/privacy>.

Links to other websites

As part of our service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information content they contain. This privacy policy applies solely to the information collected by us. Therefore, this privacy policy does not apply to your use of a third-party website accessed by selecting a link provided by us. Should you use a service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application.

We encourage users to read the privacy notices of other websites before proceeding to use them.

WebChat service

We use a third-party provider, Pure Chat Inc (a Delaware corporation), to supply and support our WebChat service, which we use to handle customer enquiries in real time.

If you use the WebChat service we will collect your name, email address (optional) and the contents of your WebChat session. This information will be retained for 90 days and will not be shared with any other organisations.

You can download a transcript of your WebChat session at the end of each WebChat.

For more information, please see [Pure Chat's privacy policy](#)

<https://www.purechat.com/privacy>



PEOPLE WHO REQUEST INFORMATION ABOUT OUR SERVICES

We can be contacted by email, phone, post, in person, via our website contact form or WebChat service. In all cases, the safekeeping of your information, especially your personal information is of utmost importance to us. We'll only ask you for the information the best helps us to understand your needs and that enables us to handle your enquiry and any subsequent booking in an efficient manner and in accordance with our internal practices and legal obligations.

Email correspondence

We use Microsoft Outlook as our email client. With built-in anti-spam and anti-malware protection, we monitor any emails sent to us, including file attachments, for viruses or malicious software. However, it is generally considered that email is not entirely secure.

We will never ask for personal information by email (including credit card details) – if registering for one of our programmes or agent partner scheme, you should do so using our online forms and not by sending your personal information by email. Any personal information sent to us by direct email will be deleted on receipt. You should be aware that any emails we send or receive may not be protected in transit. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

When enquiring with us, we will log your name, email address, enquiry details and source information about how you found us. This is kept on our secure cloud-based server. A unique reference number is then issued and is to be included in any future correspondence. This helps us to efficiently manage your enquiry and enables us to monitor and track the information we hold on you.

Phone

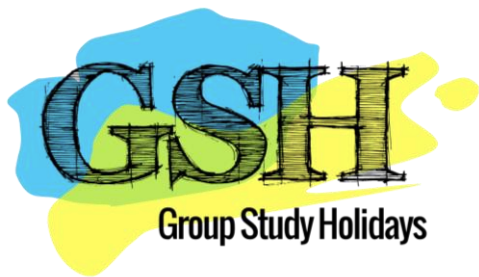
When you call us to discuss your requirements over the phone, we may take a note of some of your personal information such as your name, email address, phone number, enquiry details and source information about how you found us. This is logged electronically and kept on our secure cloud-based server. A unique reference number is then issued and is to be included in any future correspondence. This helps us to efficiently manage your enquiry and enables us to monitor and track the information we hold on you. Any physical notes taken during a call will be destroyed after any relevant information has been transferred in the way outlined above.

Post

We never request for any personal information be sent to us by post. All enquiries, registrations, feedback and correspondence is carried out via the other methods outlined in this section.

In person

When you visit us to discuss your requirements in person, we may take a note of some of your personal information such as your name, email address, phone number, enquiry details and source information about how you found us. This is logged electronically and kept on our secure cloud-based server. A unique reference number is then issued and is to be included in any future correspondence. This helps us to efficiently manage



your enquiry and enables us to monitor and track the information we hold on you. Any physical notes taken during a visit will be destroyed after any relevant information has been transferred in the way outlined above. If visiting us to register for one of our courses in person, we will ask you to register online using one of our internet-enabled devices. Any personal information submitted via our online registration forms will be handled in the way outlined in the 'people who register on our courses' section below.

Web contact forms

See above 'Visitors to our website'

PEOPLE WHO REGISTER FOR OUR COURSES

By filling in one of our online registration forms, you'll be giving us some of your personal information - information that says something about you as an individual. This will include your name, contact details, information specific to your identity and personal characteristics such as your level of English, any dietary needs and medical conditions. We will also collect contact details of someone whom we should contact in a medical emergency – you must gain the consent of this person before passing their details to us.

We only collect information from you that is necessary; information that allows us to carry out our enrolment practices in line with our policies and procedures, and that helps us to ensure we meet our legal and immigration obligations.

We use a third-party service, Typeform S.L., to create our registrations forms which are then embedded in our website. We also use Typeform to manage and update our registrations forms. Personal information you submit to us via our registration forms will be held as a computerised record on Typeform's secure web-server and, temporarily, on our cloud-based email client, and will be accessible only to those on our team with specific responsibility for the registration or classroom placement of students. Once a registration has been confirmed, any personal information is deleted from our email client.

For more information, see [Typeform's privacy policy](#)

Registration of children

Only persons with parental or legal guardian responsibility for applicants under the age of 18 may complete child registration forms. Information provided to us via our online child registration forms is handled as outlined in the above section 'people who register for our courses,' but with the addition of a section on the form whereby specific parental or legal guardian consent is gained. We require this to allow us to collect and process the information.

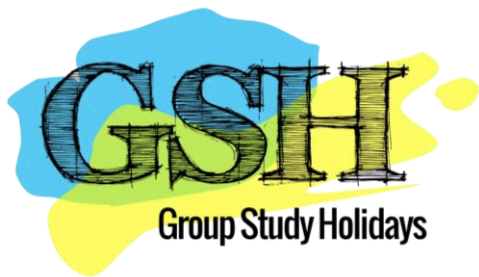
Secure online and mobile payments

We use a third party, Worldpay UK Limited, to process credit card payments on our behalf. With Worldpay, we operate a 'pay by link' service whereby we send secure payment web-links to our customers – these are sent by email via our email client. Once clicking on the web-link, customers will open a secure Worldpay payment screen. Worldpay require certain pieces of personal information in order to verify credit/debit card payments – this may include names, addresses, email addresses and credit/card details (including security

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code). Any personal information provided while using this service is the responsibility of Worldpay UK Limited and we urge our customers to read their [privacy policy](#) before proceeding.

After payments are approved by Worldpay, we receive email notification via our email client. Notification emails contain personal information that we need in order to match payments to individual registrations. These include booking reference numbers, names and sometimes addresses, but not credit/debit card details. Notification emails are saved in Student Folders (see below 'processing of registration and student-stay information'), then deleted from our email client.

Processing of registration and student-stay information

Throughout registration and induction we will collect and process the following pieces of personal information:

- Names, addresses, email addresses, phone numbers
- Date of birth
- Nationality, passport, identity and/or visa details
- Medical emergency contacts (next of kin)
- Dietary, medical, disability requirements
- Level of English
- Parental or legal guardian names and dates of birth (registrations for under 18's only)

At registration, students have an individual Student Folder created, identified by their unique four-digit reference number, stored on our secure cloud-based file server. This is an internal folder where access is restricted only to those members of our team who are responsible for handling registrations and classroom placements. It is not accessible to the student, their parent or booking agent without an access request having been made (see 'access requests' below). Once registration and induction is complete, a Student Folder is the only place where the complete set of data (outlined above) is stored.

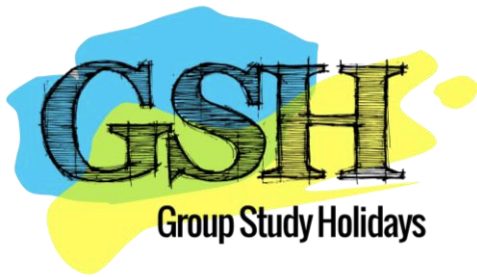
Certain pieces of information are also held in other areas of our secure cloud-based server. This includes our enquiry, enrolment and past student logs. Only information necessary for the processing of your booking and ongoing stay with us is recorded. Again, access is restricted only to those members of our team who are responsible for handling registrations and classroom placements.

PEOPLE WHO SUBSCRIBE TO OUR MARKETING UPDATES

Email marketing

We use a third-party provider, MailChimp, to deliver regular news, updates and offers. When collecting email addresses in any area of our website, we will always ask your subscription consent before including you in our e-mailings. We gather statistics around email opening and clicks using the reporting tools provided by MailChimp – this helps us monitor and improve our communications.

You can unsubscribe at any time by clicking on the one-click 'unsubscribe' at the bottom of our e-mailings or can email us at office@abclanguages.com, asking to be removed from our list. 'Unsubscribing' will stop



any further communication from us, but MailChimp will continue to store anonymised data to assist us in evidencing that your data has been handled in accordance with this policy.

For more information, please see [MailChimp's privacy notice](#).

<https://mailchimp.com/legal/privacy/>

PEOPLE WHO APPLY TO AND WORK WITH US TO PROVIDE ACCOMMODATION TO OUR STUDENTS

By applying to work with us as an accommodation provider, we will collect and process the following pieces of personal information for you and others in your household:

- Names, addresses, email addresses, phone numbers
- Date of birth
- Nationality, passport and identity details
- Dietary, medical, disability details

Apart from the information you give us, we may also receive information from government departments (e.g. the Disclosure & Barring Service).

We only collect information from you that is necessary; information that allows us to carry out our accommodation practices in line with our policies and procedures.

If your application is unsuccessful, we will hold your data for a period of six months for statistical purposes. At the end of this time it will be deleted. If you would like us to delete this data sooner, please email office@abclanguages.com to make your request. We will respond to such requests within 28 days.

Successful applicants have an individual Host Folder created which is stored on our secure cloud-based file server. This is an internal folder where access is restricted only to those members of our team who are responsible for our accommodation practices. Once an application is complete and you're working with us, a Host Folder is the only place where the complete set of data (outlined above) is stored.

PEOPLE WHO APPLY TO WORK WITH US AS AN AGENT PARTNER

We ask all potential agent partners to submit their applications using our online form. We're unable to handle applications received in any other way. By filling in one of our online application forms, you'll be giving us some personal data - information that says something about you as an individual. This may include your name, contact details, and information specific to your identity.

Apart from the information you give us, we may also receive information from your referees.

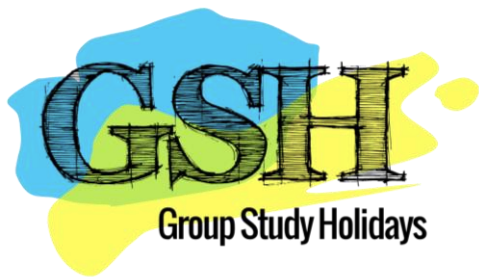
We only collect information from you that is necessary; information that allows us to carry out our agency practices in line with our policies and procedures.

We use a third-party service, Typeform S.L., to create our application forms which are then embedded in our website. We also use Typeform to manage and update our application forms. Personal information you submit to us via our application forms will be held as a computerised record on Typeform's secure web-server and, temporarily, on our cloud-based email client, and will be accessible only to those on our team with specific

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responsibility for recruitment and selection as well as our administration personnel. Once an application has been processed, any personal information is deleted from our email client.

For more information, see [Typeform's privacy policy](#)

If your application is unsuccessful, we will hold your data for a period of six months for statistical purposes. At the end of this time it will be deleted. If you would like use to delete this data sooner, please email office@abclanguages.com to make your request. We will respond to such requests within 28 days.

Successful agent partner applicants have an Agent Folder created which is stored on our secure cloud-based file server. This is an internal folder where access is restricted only to those members of our team who are responsible for our agent-partner relationships and student-recruitment practices. Once an application is complete, an Agent Folder is the only place where the complete set of data (outlined above) is stored.

JOB APPLICANTS AND OUR CURRENT AND FORMER EMPLOYEES

We ask all applicants to submit their applications using our online form. We're unable to handle applications received in any other way. By filling in one of our online application forms, you'll be giving us some personal data - information that says something about you as an individual. This may include your name, contact details, information specific to your identity and personal characteristics such as your ethnic group and any medical conditions.

Apart from the information you give us, we may also receive information from previous employers, your referees and government departments (e.g. HMRC and the Disclosure & Barring Service).

We only collect information from you that is necessary; information that allows us to carry out our recruitment practices in line with our policies and procedures, and that helps us to ensure we treat everyone fairly and equally.

We use a third-party service, Typeform S.L., to create our application forms which are then embedded in our website. We also use Typeform to manage and update our application forms. Personal information you submit to us via our application forms will be held as a computerised record on Typeform's secure web-server and, temporarily, on our cloud-based email client, and will be accessible only to those on our team with specific responsibility for recruitment and selection as well as our Human Resource personnel. Manual records may also be kept. Once an application has been processed, any personal information is deleted from our email client.

For more information, see [Typeform's privacy policy](#)

If your application is unsuccessful, we will hold your data for a period of six months for statistical purposes. At the end of this time it will be deleted. If you would like use to delete this data sooner, please email office@abclanguages.com to make your request. We will respond to such requests within 28 days.

Successful applicants have an individual Staff Folder created which is stored on our secure cloud-based file server. This is an internal folder where access is restricted only to those members of our team who are



responsible for our HR practices. Once recruitment is complete, a Staff Folder is the only place where the complete set of data (outlined above) is stored.

ACCESS, RECTIFICATION, ERASURE & RESTRICTION OF PROCESSING REQUESTS

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

You have the right to ask us to erase your personal information in certain circumstances.

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests.

Group Study Holidays (GSH) Limited is the controller for the personal information we process, unless otherwise stated.

Your right to data portability: This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

If we are processing your information for criminal law enforcement purposes, your rights are slightly different.

There are many ways you can contact us, including by phone, email, live chat and post.

Our postal address:

DPO
Group Study Holidays (GSH) Limited
The Cambridge Union Society
9a Bridge Street
Cambridge
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Phone number: 00441223 417143

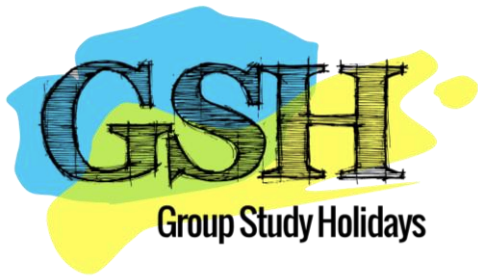
Email: office@abclanguages.com

Live webchat at: www.abclanguages.com

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You are not required to pay any charge for exercising your rights. If you wish to exercise your rights, please contact us using the above contact options. We will respond to you within 28 days.

We keep our privacy notice under regular review to make sure it is up to date and accurate.

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