



Privacy Policy iConnect English Academy

Introduction

At iConnect English Academy we are committed to protecting and respecting your privacy. We work very hard to keep your information safe and we want our use of your data to be secure. We follow strict procedures on how personal information is stored and used, and we also limit who sees it to help stop any unauthorised person getting hold of it.

This Privacy Policy (and any other documents referred to in it) sets out the basis on which we will process and use any personal information about our website visitors that we collect from them and they provide to us. Please read this Privacy Policy carefully to understand our practices regarding your personal information and how we will treat it. 'Website' refers to www.icconnectenglish.co.uk

1. Who we are and how to contact us

iConnect English Academy is a partnership owned and operated by Mike Archer and Gaynor Cameron, (referred to as "we", "us" and "our" in this privacy policy) who are the controllers responsible for personal information processed by it.

It is important that you read this privacy policy carefully so that you are fully aware of how and why we use your personal information. We do not knowingly collect personal information relating to children under 16, except for their name age and email address.

If you have any questions about this privacy policy or if you wish to exercise your legal rights set out in this privacy policy, please contact our DPO using the details below.

Data Protection Officer

Email: contact@icconnectenglish.co.uk

2. Changes to this privacy policy

We reserve the right to amend or modify this privacy policy from time to time.

3. What types of personal information we collect

Depending upon the way in which you use our website and the individual services you are looking to buy, we may obtain the following:

- personal information so that we can identify who you are. For example, this information may include your name and date and place of birth
- personal information so that we can contact you. For example, this information may include your home address, your email address and your contact telephone numbers
- personal information such as your work or your profession
- Copies of necessary identification documents e.g., Passport/recognised ID card etc required for our Due Diligence obligations
- Other more sensitive personal information so that we can help you focus on your learning objectives and aspirations
- Other personal information such as copies of your relevant qualifications or disclosure documents if you apply to teach for us

4. How we use personal information

How might you use my personal information?	What lawful basis will you have to use my personal information in this way?	Why do you use my personal information in this way?
We may share your personal information (for example your email address) with other users of our services	This processing of your personal information is necessary so that we can provide our services to you in accordance with our legitimate business use and in line with our website terms and conditions	To provide you with the best experience and enable you to connect with other learners
If you opt-in to receive general marketing from us, we may process your personal information for the purposes of providing our general marketing to you. For example, if you opt-in to receive our general marketing, we may send you newsletters, information about our latest offers, products and promotions and more.	We will only process your personal information for the purposes of providing direct marketing to you with your consent.	All of our marketing is carefully drafted and intended always to be relevant and useful for our customers.
We may process your personal information in order to send you service communications.	This processing of your personal information is necessary so that we can provide our services to you in accordance with our website terms and conditions.	Without processing your personal information in this way, we would be unable to provide our services to you.
We may process your personal information in order to detect and prevent financial crime, including fraud.	We have a legitimate interest in processing your personal information for the purposes of detecting and preventing financial crime.	It is in our legitimate interests to process your personal information in this way because financial crime negatively impacts all of us. We take our obligation to investigate, report and hence seek to prevent financial crime extremely seriously and we believe our work in this area benefits the overwhelming majority of our customers who use our website honestly.
We may process your personal information in order to comply with any and all legal and/or regulatory obligations to which we are subject.	This processing of your personal information is necessary so that we can comply with legal obligations to which we are subject.	We are subject to numerous laws, rules and regulations. Sometimes it is necessary for us to process your personal information in order to obey the laws, rules and regulations to which we are subject.
We may process your personal information in order to obtain feedback and reviews for customer research purposes to help us improve and quality control our service.	We have a legitimate interest in processing your personal information in order to ensure that we are always able to provide an excellent quality of service.	It is in our legitimate interests to process and share your personal information in this way so that we can provide an excellent quality of service. This helps us to understand how we can better satisfy your needs and hence grow our business. Our work in this area ensures that we can continue to provide the level of service which you have rightly come to expect from us.

5. How we collect personal information

We collect personal information from you when you interact or engage with our website including when you register an account with us. We may also collect personal information from you when you talk to us on the phone, by post or online including via email, social media and mobile device apps. We may also engage with you and hence collect personal information from you if you choose to provide feedback or take part in any of our other market research initiatives, customer surveys or promotions. If you are a teacher we will request relevant documentation for our records such as your CV and DBS certificate and these will be held electronically by us.

6. Third parties with whom we may exchange personal information

We may share personal information with or receive personal information from:

- our regulators and any necessary regulatory bodies,
- law enforcement and fraud prevention agencies; and
- third parties to whom we may sell, transfer or merge parts of our business or assets

7. What communications you may receive from us

The communications we send to our customers can be categorised broadly as “direct marketing communications” and “service communications”.

a. Direct marketing communications

We understand that some of our customers like to receive our newsletters and other information about our latest offers, products and promotions. You can choose to opt-in to receiving these direct marketing communications when you subscribe to our products and services. You can also choose to opt-out of receiving these direct marketing communications at any time.

b. Service communications

Service communications broadly comprise of communications which:

1. we have a legal or regulatory obligation to send to you (such as communications which we are obliged by our regulator to send to you from time to time).
2. we send in connection with the provision of our services to you; and
3. we send so that we can provide services at your request (such as password reset emails, which you may ask us to send if you do not remember your login credentials but want to access our products and services).

8. How long we retain personal information

We may keep your personal information for up to six (6) years following the date on which we last provide our products or services to you or only for as long as is reasonably necessary thereafter in order to:

- respond fully to any questions or complaints
- evidence that we have treated customers fairly or satisfy some other legal, accounting, tax or reporting requirement; and
- establish, exercise or defend legal claims in accordance with statutory limitation periods.

9. Data security

The security of personal information is extremely important to us and hence we have put in place appropriate security measures to protect personal information from being accidentally lost, used or accessed in an unauthorised way.

10. Your legal rights

a. Right of access

You have a right to know whether we are processing your personal information. If we are processing your personal information, you also have a right to request copies of your personal information that we are processing and certain further information, including the purposes of our processing and the recipients or categories of recipients to whom we have disclosed (or will disclose) your personal information.

b. Right to rectification

You have the right to require us to rectify or complete any inaccurate or incomplete personal information that we are holding about you.

c. Right to erasure

You have a right to ask us to erase your personal information. This is also known as the “right to be forgotten”. We must erase your personal information following your request except in limited circumstances prescribed by law, such as where we need to retain your personal information in order to comply with a legal obligation or in order to establish, exercise or defend legal claims. In these circumstances, we will restrict our processing of your personal information by putting it “beyond use”. This means that your personal information is deleted from our website and retained only in a separate and restricted database, where it will not be processed for any purpose other than as detailed above. Access to this database is managed by our DPO and is strictly limited.

d. Right to restriction of processing

You have a right to require us to restrict processing of your personal information where: -

1. you believe that the personal information we hold about you is inaccurate, and we require reasonable time to verify the accuracy of that personal information
2. your personal information has been unlawfully processed by us, but you do not want us to erase that personal information
3. it is no longer necessary for us to keep your personal information for the purposes for which they were collected by us, but they are required by you for the establishment, exercise or defence of legal claims; or
4. you exercise your right to object to processing and we require reasonable time to verify whether there are any overriding grounds upon which we may rely in order to continue that processing.

e. Right to data portability

If we process your personal information with your consent or because it is necessary for us to do so in order to provide our service to you, you may require us to move, copy or transfer that personal information to you or another third party in a structured, commonly used and machine-readable format.

f. Right to object

You have a right to object to our processing of your personal information where we are processing that personal information on legitimate interest grounds. We will stop processing this personal information if you exercise your right to object unless there are overriding grounds upon which we may rely in order to continue that processing or unless that processing is necessary in order to establish, exercise or defend legal claims.

You also have a right to object to our processing of your personal information for direct marketing purposes. You can object to our processing of your personal information for direct marketing purposes by unsubscribing via the unsubscribe hyperlink in any direct marketing messages which we may send to you. We will stop processing your personal information for direct marketing purposes if you request us to do so.

g. Right to withdraw consent



If we process your personal information with your consent, you have a right to withdraw your consent at any time. If you withdraw your consent, we may be unable to continue to provide certain services to you, but we will inform you if that is the case.

11. Cookies

1. Our Website uses “cookies” and other tracking technologies which are placed and stored on your computer hard drive or in the browser memory, if you agree, when you visit our Website.
2. We use technical information gathered in this way for site management and security purposes and for:
 1. Improving our Website and ensuring that content is presented effectively.
 2. Managing our Website and ensuring that it is safe and secure
 3. Administering our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. (automatically collected technical information about visits to our Website is used for these purposes).

12. Complaints

You can complain to us the Information Commissioners Office at any time on telephone number 0303 123 1113 or <https://ico.org.uk/> .However, we appreciate the chance to deal with your concerns so please do contact us in the first instance.