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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 EngXcel Limited; a limited company registered in England and Wales under No. 13642156.

EngXcel 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, unless otherwise stated.

Here, we'll explain what to expect when we collect personal information when you interact with us – data that says something about you as an individual. We cover this information in the following sections:

[How we collect your data](#)

[How you can contact us and what happens when you do](#)

[Visitors to our website](#)

[Visitors to our office](#)

[Sharing your information](#)

[Links to other websites](#)

[Children's data](#)

[What we do with your personal data when you...](#)

[Request information or materials about our services](#)

[Register for or book our courses or other services](#)

[Subscribe to our marketing updates](#)

[Apply to and work with us to provide accommodation to our students](#)

[Apply to and work with us as an agent partner](#)

[Apply for a job or are a current or former employee](#)

[Your data protection rights](#)

[How to contact us](#)

[How to contact the appropriate authority](#)

[Changes to our privacy policy](#)

How we collect your data


You directly provide us with most of the data we collect. We collect data and process data when you:

- enquire with us or request information about our services;
- register for our courses or other services;
- start a course with us;
- give optional feedback or make a complaint about one of our services;
- subscribe to our marketing updates & newsletter;
- apply to work with us to provide accommodation to our students;
- apply to work with us as an agent partner;
- create a login for our agent portal;
- apply for a job with us, or are a current or former employee.

We also receive personal information indirectly, in the following scenarios:

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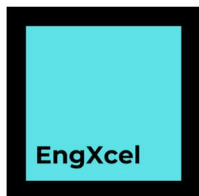
 hello@engxcel.com

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Future Business Centre Cambridge

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- when you enquire or book with us via an agency or someone else acting on your behalf, for example your host family if you are an au pair;
- when someone registers for a course and lists you as an emergency contact;
- when we receive a confirmation of your payment from our secure online payment provider, Revolut Business, if you pay using this method;
- when you visit our site, in the form of CCTV footage;
- where you have made your contact information available on your organisation's website and we use this to contact you and your organisation in our role as a language school, for example if you are an agent or a language course comparison website;
- an agent partner of ours gives your contact details as a referee;
- an employee of ours gives your contact details as an emergency contact or a referee;
- from government departments (e.g. the Disclosure & Barring Service) when you apply to work with us as an accommodation provider or employee.

If it is not disproportionate or prejudicial, we'll contact you to let you know we are processing your personal information.

If you make an enquiry or booking with us, you will also be given a unique student reference number in our system. Similarly, if you work with us as an accommodation provider, you will be given a unique accommodation provider reference number in our system. This helps us to efficiently manage your enquiry or booking(s) and enables us to monitor and track the information we hold on you.

If you book a course with us that includes access to our online learning platform, Xcel Online, we will also create unique login details for you, including a username which will be visible to other users of the platform. This enables you to use our learning platform. The username will consist of your firstname and the initial(s) of your surname – eg John Smith's username would be *john.s*.

If you book any course with us, we will create unique login details for you (username and temporary password) to enable you to use our student app, MyEngXcel. Use of this app is completely optional.

How you can contact us and what happens when you do

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.

We use Transport Layer Security (TLS) to encrypt and protect email traffic. Most webmail such as Gmail and Hotmail use TLS by default. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.


Online forms

We use online forms embedded in our website to collect personal information which is directly provided by you (or someone acting on your behalf, such as an agent or parent) when you (or they):

- complete our enquiry or registration forms;

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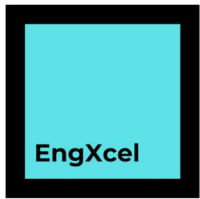
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- complete our pre-course placement test;
- apply to work with us as an employee, accommodation provider, or agent partner;
- register for a login for our agent portal.

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. We only ask for the information required to provide the services you are booking or answer your enquiry to the best of our ability.

Phone

When you call us to discuss your requirements over the phone, we collect Calling Line Identification (CLI) information. This is the phone number you are calling from (if it's not withheld). We hold a log of the phone number, date, time and duration of the call, but do not audio record the call itself. We hold this information for 6 months.

We don't audio record any calls, but we may take notes to help us answer your query. If you require a follow up call or email, we will also ask you to provide us with your contact details. Any physical notes taken during a call will be destroyed once the query has been fully dealt with or once the relevant information has been logged in our digital system if you are making an enquiry, requesting information about our courses or subscribing to our email marketing & newsletter.

Post

We never request that 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.

However, we do sometimes receive information sent to us via post. We see all this information and decide how we manage it. For example, if you send a message via post that needs a response from us, we may process it in the same way as we do email correspondence.

In person

When you visit us to discuss your requirements in person, we may take notes to help us answer your query. If you require a follow up call or email, we will also ask you to provide us with your contact details. Any physical notes taken during your visit will be destroyed once the query has been fully dealt with or once the relevant information has been logged in our digital system if you are making an enquiry or requesting information about our courses.

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 relevant parts of this notice.

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.

Visitors to our website

When someone visits www.engxcel.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

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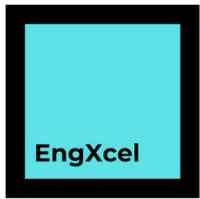
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navigate and use our website, and to better tailor the information we provide to the needs of our visitors. This information is processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find 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

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our website, we may collect information from you automatically through cookies or similar technology.

You can read more about how we use cookies on our <https://www.engxcel.com/cookies>, as well as manage your cookie preferences on our website.

For more information about cookies in general, including instructions on how to remove cookies from your browser or to set your browser not to accept cookies, you can take a look at the following website: <https://www.allaboutcookies.org/>. However, in a few cases, if you do remove or block cookies, some of our website features may not function as a result.

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, GoDaddy Inc, to build and manage our website, www.engxcel.com/cookies. GoDaddy 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 GoDaddy's servers. When providing personal information via our web-forms, we always ask for your consent. GoDaddy's collection, disclosure, storage, and use of your personal information is in accordance with GoDaddy's privacy policy available at <https://www.GoDaddy.com/privacy>.

Purpose and lawful basis for processing

The purpose for implementing the above is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users. The lawful basis we rely on to process your personal data is either Article 6(1)(a) of the GDPR, for example when we require your consent for the optional cookies we use, or Article 6(1)(f) which allows us to process personal data when it's necessary for our legitimate interests. For example in order to maintain the integrity of our IT systems and the continuity of our business.

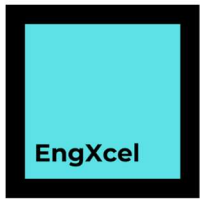
Visitors to our office

We meet visitors at our premises, including:

- enquiring students;
- job applicants;
- accreditation inspectors;
- suppliers and tradespeople;

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- external training providers.

In cases where your visit involves sitting in on classes, we will use your name and visit information to print a personalised badge for you to wear throughout your visit. Personalised badges will be destroyed when you leave the premises.

Closed-circuit television (CCTV) operates outside the building for security purposes. The information is viewed by the building landlords on a live feed and recorded for security purposes. Any CCTV used in our office is not operated by us, so we are not the controller. It will be under the control of the relevant building landlord.

We have Wi-Fi on site for the use of students and visitors. We'll provide you with the address and password.

We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received.

We don't ask you to agree to terms, just to the fact that we have no responsibility or control over your use of the internet while you are on site, and we don't ask you to provide any of your information to get this service.

The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The lawful basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

Sharing your information

We will not share your information with any third parties for the purposes of direct marketing.

We use data processors who are third parties who provide elements of services for us. We have agreements in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

If you book a third-party service through us, such as accommodation, an exam or social activities, we will share with them the minimum information for them to provide the service to you.

In some circumstances we are legally obliged to share information. For example with the UK Visa & Immigration service for those students requiring a visa to study in the UK or with statutory bodies responsible for child protection, or with our accrediting body during an inspection. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

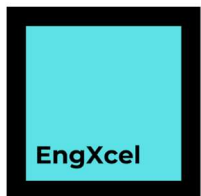
Links to other websites

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.

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Children's data

Where we provide courses or accommodation for children, we collect the personal data necessary to do that. The information in the relevant parts of this notice applies to children as well as adults.

Only persons with parental or legal guardian responsibility for an applicant under the age of 18 (or those instructed by the parental or legal guardian to do so) may complete registration forms on behalf of that applicant. Information about children provided to us via our online registration forms is handled as outlined in the below section **What we do with your personal data when you... register for or book our courses or other services**, 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.

What we do with your personal data when you...

Request information or materials about our services

We can be contacted by email, phone, post, in person or via our website contact form. In all cases, the safekeeping of your information, especially your personal information is of utmost importance to us.

Purpose & lawful basis for processing

When you contact us to make an enquiry, we collect information, including your personal data, so that we can respond to it and answer your query.

The lawful basis we rely on to process your personal data is article 6(1)(a) of the GDPR, which allows us to process your personal data with your consent.

If the information you provide us in relation to your enquiry contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(a) of the GDPR, explicit consent.

You have the right to withdraw your consent at any time by contacting us using one of the methods given in the **How to contact us** section of this notice. If you do that, we'll update our records immediately to reflect your wishes.

What data we need and why

We need enough information from you to answer your enquiry. This will include contact details so that we can send a response (typically your name and email), as well as details of your enquiry itself, which may include further information about you if you choose to give it – for example your age or level of English. 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.

What we do with the data


We'll set up a record in our school management system to record your enquiry. We'll also keep a record of our response. We use the information supplied to us to deal with the enquiry and any subsequent booking, and to check on the level of service we provide. We'll also use it to create aggregate data with no personally identifying information to monitor interest in our courses and booking rate.

How long we keep the data

Your data will be kept for 2 years for the reasons set out in this policy, after which it will be anonymised by changing the name and surname and deleting all contact details and related documents, so that no personal data remains.

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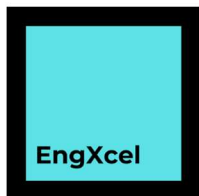
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Data processors and storage

We use Fidelo School management software, provided to us by Fidelo Software GmbH, to create, manage and update our enquiry form and to log your enquiry and help us respond to it. The data is stored in Fidelo's secure cloud-based servers within the EU. For more information, take a look at Fidelo's privacy policy:

https://fidelo.com/en/data_protection_declaration.html

Register for or book our courses or other services

Purpose & lawful basis for processing

When you register for one of our courses, we collect information, including your personal data, 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 student welfare, legal and immigration obligations.

The lawful bases we rely on to process this data are articles 6(1)(a) of the GDPR (which allows us to process your personal data with your consent) and 6(1)(c) (we have a legal obligation).

If the information you provide us in relation to your enquiry/booking or at any point during your course with us contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(a) of the GDPR, explicit consent.

You have the right to withdraw your consent at any time by contacting us using one of the methods given in the **How to contact us** section of this notice. If you do that, we'll update our records immediately to reflect your wishes.

If you make a payment to us through Revolut Business, we receive some of your personal data from them for accounting purposes. The lawful basis we rely on to process it is article 9(2)(f) of the GDPR, legitimate interests.

When you use our online learning platform we collect certain data in order to provide and improve the service and ensure that our obligations to security and data protection are met.

The lawful bases we rely on to process this data are articles 6(1)(a) of the GDPR (which allows us to process your personal data with your consent) and 6(1)(c) (we have a legal obligation).

What data we need and why

The data we collect 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 need this information in order to provide your course, as well as any other services you book with us, including accommodation and airport transfers.

During registration and/or induction, we will also collect the passport and visa details necessary to fulfil our legal obligations to the UK Visa & Immigration service.

When you use our online Pay By Link facility you submit your name, address, transaction and credit/debit card details to Revolut Business (UK) Limited and parts of its group ("Revolut Business") through an online payment gateway which provides

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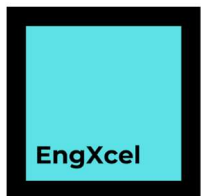
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secure, online, real-time payment services to us. Revolut Business is the data controller of that information and is bound by the provisions of GDPR. Revolut Business has confirmed that its payment processing systems are compliant with PCI DSS industry security standards. Revolut Business processes your payment and provides us with confirmation and details of your payment. These details include your IP address. This payment information is necessary as part of our accounting and student booking records. We do not store, hold, use or process your credit/debit card details at any time.

When you use our online learning platform, we collect personal data including user login history using cookies set by the data processor, Moodle PTY Ltd. These details include your IP address. This information is necessary to provide you with use of our online learning platform and allow us to manage and improve the service, as well as for security and data protection purposes, including to authenticate users, prevent fraudulent use of user accounts, or offer site features.

What we do with the data

The information necessary for the processing of your booking and ongoing stay with us is recorded in our school management system. If you made an enquiry with us before registering for a course, the record created will be updated or linked with this new information. If not, we will create a new record for you. Access to the full record is restricted only to those members of our team who are responsible for handling registrations and classroom placements. Parts of the record necessary for administering classes or other services booked, or for safety and welfare, will be made available to the teachers or relevant service providers.

When we receive a payment towards your booking, we will log information about that payment into our school management system, including the amount, the date received, the payment method and who paid it. This is in order to keep track of the payments received for your booking and what remaining fees are due. If paying using our Revolut Business Pay By Link service, we share your name, reference number and payment amount with Revolut Business to create the link. When you click on this link, you will be transferred to a secure payment webpage maintained by Revolut Business where you will be prompted for your address and credit/debit card details to complete the transaction. We use the payment information provided to us by Revolut Business to verify that a payment has been made, the amount paid and to match it to the correct booking.

Contact via the mobile number you provide during registration is only made to discuss your booking or to reach you in a school emergency. In an emergency, contact may be made via text (SMS). To facilitate emergency SMS contact, we will add your name and mobile number to our SMS software, Textlocal, at the start of your booking and remove them at the end of your booking.


If you book accommodation through us, we will pass some of your details to the accommodation provider to facilitate your stay. This will be the minimum amount of data required, which will typically be your name, age and travel dates. If your accommodation booking includes catering, we will also pass on any dietary requirements you have told us about. The accommodation provider will only use this data to provide the service you have booked.

If you need a visa to study in the UK and mention us in your visa application, the UK Visa & Immigration department may contact us to confirm details of your booking with us. If so, we will be obliged to share some of your data with them in order to confirm the legitimacy of your booking.

If you are booking through an agent, we will use your personal data in communications with them (for example booking confirmation, transfer details if applicable) in order to process your booking and ongoing stay with us.

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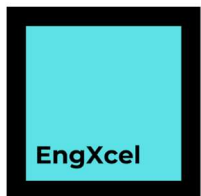
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Your booking details, class timetable, and attendance will be made available to you in the student app if you choose to download it.

If your course includes access to our online learning platform, we will upload some of your data to this platform, including your name, email address, student reference number, course and class assignment, as well as creating a username and temporary password. Only admin users of the site (ie only to those on our team with specific responsibility for the registration or classroom placement of students) have access to the full data. The information visible to other users depends on their role – other students can only see your username and course enrolments. Moodle uses this data strictly to provide the service and will not share your data for marketing purposes. Where necessary, for example to provide online lessons, they will share minimal data with third-party software providers such as BigBlueButton, their audio-visual conferencing software. These third-parties will use the data strictly to provide the service and nothing else. We use the information gathered by Moodle through the use of cookies only to provide, manage and improve the platform and online learning, ensure site security and monitor student engagement.

How long we keep the data

Your data will be kept for 2 years after the service end (ie the last date of the last service you booked with us) for business purposes, after which it will be anonymised by changing the name and surname and deleting all contact details and related documents, so that no personal data remains. Your information is deleted from Textlocal within 1 month of the service end.

If your booking included use of our online learning platform, we will delete your course enrolment data 2 weeks after your booking ends. We will keep your account and any remaining user data for 2 years after your booking ends in case you wish to resume your studies, after which time we will delete it.

Data processors and storage

We use Fidelo School management software, provided to us by Fidelo Software GmbH, to create, manage and update our registration form, which is then embedded in our website. We also use Fidelo to keep a record of your registration information and manage your booking with us. The data is stored in Fidelo's secure cloud-based servers within France and Germany. For more information, take a look at Fidelo's privacy policy:

https://fidelo.com/en/data_protection_declaration.html

We use a third-party service, Typeform S.L., to create our placement test and feedback forms which are then embedded in our website. We also use Typeform to manage and update our placement test and feedback forms. Personal information you submit to us via our placement test or feedback 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.

We use a third-party service, Textlocal Ltd, to manage and send out text messages. The name and mobile number you submit to us via our registration forms, will be held as a computerised record on Textlocal's secure server. For more information, see Textlocal's Privacy Policy: <https://www.textlocal.com/legal/privacy/>

We use a third party, Revolut Business UK Limited, to process credit card payments on our behalf. Any personal information provided while using this service is the responsibility of Revolut Business UK Limited and we urge our customers to read [their privacy policy](#) before proceeding.

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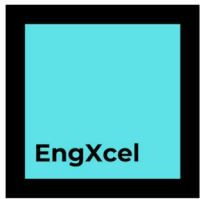
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We use a third-party service, Moodle PTY Ltd, to build and manage our online courses, engxcel.moodlecloud.com. Moodle's collection, disclosure, storage, and use of your personal information is in accordance with Moodle's privacy policy available [here](#) (users must read and agree to Moodle's privacy & cookies policy before using the platform).

Subscribe to our marketing updates

Purpose & lawful basis for processing

Our purpose for collecting the information is so we can provide you with a service and let you know about upcoming events and special offers.

The lawful basis we rely on for processing your personal data is your consent under article 6(1)(a) of the GDPR. We rely on your consent to process the personal data you provide to us for marketing purposes. This means you have the right to withdraw your consent, or to object to the processing of your personal data for this purpose at any time. If at any point you want to withdraw your consent, you can unsubscribe at any time by clicking on the one-click 'unsubscribe' at the bottom of our e-mailings or by emailing us at hello@engxcel.com, asking to be removed from our list. 'Unsubscribing' will stop any further communication from us, but GoDaddy will keep a record as evidence of your unsubscription.

What data we need and why

We use your name and email address to personalise and send you mailings appropriate to your interest in us, whether you're an agent, supplier, past or potential student.

What we do with the data

We only use your details to provide the service, unless you have also provided them for us to use for another purpose, such as booking one of our courses.

We gather statistics around email-opening and clicks using the reporting tools provided by GoDaddy – this helps us monitor and improve our communications.

Once you have submitted your details, you will receive mailings approximately every 2-4 weeks.

How long we keep the data

We keep this data as long as you are subscribed to our mailing list. Once you unsubscribe, we will remove you from our mailing list but continue to store anonymised data to assist us in evidencing that your data has been handled in accordance with this policy.

Data processors and storage

We use a third-party provider, GoDaddy, to store our mailing lists and deliver our mailings. GoDaddy stores this information in their secure servers in various countries including the United States, Canada, Japan, and countries in the European Union. Where data is transferred internationally, GoDaddy uses Standard Contractual Clauses (SCCs). For more information, please see GoDaddy's privacy notice: <https://uk.godaddy.com/agreements/privacy>


Apply to and work with us to provide accommodation to our students

Purpose & lawful basis for processing

Our purpose for processing this information is to assess your suitability to provide appropriate accommodation to our students and to help us develop and improve our homestay procurement process.

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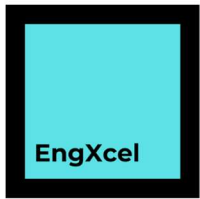
 hello@engxcel.com

 +44 (0)1223 856721

 Registered office:

Future Business Centre Cambridge

Guildhall, Cambridge, CB2 3QJ



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The lawful basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA2018 which again relates to processing for employment purposes.

We process information about applicant criminal convictions and offences. The lawful basis we rely to process this data are Article 6(1)(c) to meet our legal obligation. In addition we rely on the processing condition at Schedule 1 part 1(1).

Please see our Appropriate Policy Document for further information about our processing of your special category and criminal offence data.

What data we need and why

When you apply to work with us as an accommodation provider, you provide us with the following pieces of personal information about you and others in your household:

- Names, addresses, email addresses, phone numbers
- Date of birth
- Nationality, passport and identity details
- Dietary, medical, disability details
- Safety documentation, eg gas certificate
- Visit/inspection records

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

We need this information to allow us to carry out our accommodation practices in line with our policies and procedures.

What we do with the data

We use the information you supply to us in the application stage to assess your suitability to work with us as an accommodation provider to our students. Only those members of our team responsible for host bookings have access to this data.

When processing your application, we will share some of your personal data with the Disclosure and Barring Service in order to request a DBS check to assess your suitability to host our students (in particular those under 18 years).

Successful applicants are entered into our school management software, where we keep a record of the personal data we have collected from you. We use the data within the system to assign accommodation bookings to you and to keep track of when important health and safety information such as your gas safety certificate need to be renewed. Only those members of our team who are responsible for our accommodation practices have access to the full record kept in our school management system.

When we place a booking with you, we will share some of your information with that student necessary for the booking to take place. This will include your name, address, contact details and host profile.

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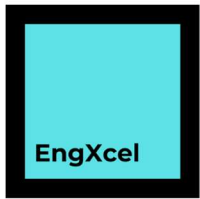
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If the student placed with you has a transfer booked by the school, we will share the information necessary for this service with the transfer provider. The transfer provider will only use your information to provide the service booked.

Contact via the mobile number you provide during registration is only made to discuss potential & confirmed bookings we have with you, your work with us as an accommodation provider or to reach you in a school emergency. For urgent communication such as a long delay to a student's arrival or a school emergency, contact may be made via text (SMS). To facilitate emergency SMS contact, we will add your name and mobile number to the SMS software we use when you start working with us and remove them when you stop working with us.

How long we keep the data

If your application is unsuccessful, we will hold your data for a period of 2 years for statistical purposes. At the end of this time it will be deleted.

If your application is successful, we will hold your data until you stop working with us, at which time we will hold your data for a period of 2 years for accounting purposes. At the end of this time, it will be deleted.

If you would like use to delete your data sooner, please email hello@engxcel.com to make your request. We will respond to such requests within 28 days.

Data processors and storage

We use Fidelo School management software, provided to us by Fidelo Software GmbH, to keep a record of your information and manage your bookings with us. The data is stored in Fidelo's secure servers within France and Germany. For more information, take a look at Fidelo's privacy policy: https://fidelo.com/en/data_protection_declaration.html

We use a third-party service, Typeform S.L., to create our application form. We also use Typeform to manage and update our accommodation provider application form. Personal information you submit to us via this form 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 accommodation provider applications.

We use a third-party service, Textlocal Ltd, to manage and send out text messages. The name and mobile number you submit to us via our registration forms, will be held as a computerised record on Textlocal's secure server. For more information, see Textlocal's Privacy Policy: <https://www.textlocal.com/legal/privacy/>

Apply to and work with us an agent partner

Purpose & lawful basis for processing

Our purpose for processing this information is to assess your suitability to work with us as an agent partner and, on successful application, to allow that work to take place.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

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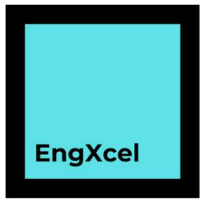
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What data we need and why

By filling in one of our online agent partner application forms, you'll be giving us personal data including 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.

If you choose to create a login to access the agent portal area of our website, you will need to provide your email and create a password, which will be your login details.

What we do with the data

We use the information you supply to us in the application stage to assess your suitability to work with us as an agent partner. Only those members of our team responsible for the administration associated with agent applications have access to this data.

Successful applicants are entered into our school management software, where we keep a record of the personal data we have collected from you. We use the data within the system to manage your bookings with us. Only those members of our team who are responsible for our agent-partner relationships and student recruitment practices have access to the record kept in our school management system.

When you create a login to access the agent portal area of our website, we only use the data you provide to enable this feature and manage access to the materials contained in our agent portal. We will not use this information for other purposes unless you have also given us the data separately for that purpose.

How long we keep the data

If your application is unsuccessful, we will hold your data for a period of 2 years for statistical purposes. At the end of this time it will be deleted.

If your application is successful, we will hold your data until you stop working with us, at which time we will hold your data for a period of 2 years for business purposes. At the end of this time, it will be deleted.

If you would like us to delete your data sooner, please email hello@engxcel.com to make your request. We will respond to such requests within 28 days.


Data processors and storage

We use Fidelo School management software, provided to us by Fidelo Software GmbH, to keep a record of your information and manage your bookings with us. The data is stored in Fidelo's secure servers within France and Germany. For more information, take a look at Fidelo's privacy policy: https://fidelo.com/en/data_protection_declaration.html

We use a third-party service, GoDaddy Inc, to build and manage our website and agent partner application form. When you submit your agent application form, your information, including personal information, will be stored in GoDaddy's secure servers and, temporarily, on our cloud-based email client, and will be accessible only to those on our team with specific responsibility for agent partner applications. GoDaddy also provides us with the online platform that allows us to provide

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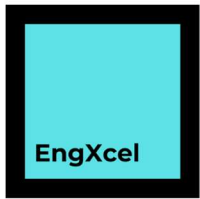
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the agent portal login feature of our website. Your login details will be stored by GoDaddy. For more information, please see GoDaddy's privacy notice:

<https://uk.godaddy.com/agreements/privacy>

Apply for a job or are a current or former employee

Purpose & lawful basis for processing

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA2018 which again relates to processing for employment purposes.

We process information about applicant criminal convictions and offences. The lawful basis we rely to process this data are Article 6(1)(c) our legal obligation. In addition we rely on the processing condition at Schedule 1 part 1(1).

Please see our Appropriate Policy Document for further information about our processing of your special category and criminal offence data.

What data we need and why

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 personal data including 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.


What we do with the data

We use the information you supply to us in the application stage to assess your suitability to work with us. Only those members of our team responsible for our HR & recruitment practices have access to this data.

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.

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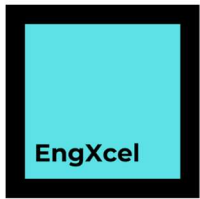
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Successful applicants are also entered into our school management software, where we keep a record of the personal data we have collected from you. We use the data within the system to manage your employment with us. Only those members of our team who are responsible for our HR practices have access to the full record kept in our school management system. Teachers and admin staff will be given login details for the software in line with their role within the school. The school management software logs user login history in order to comply with its security and data protection practices.

How long we keep the data

If your application is unsuccessful, we will hold your data for a period of 2 years for statistical purposes. At the end of this time it will be deleted.

If your application is successful, we will hold your data until you stop working with us, at which time we will hold your data for a period of six years for business purposes. At the end of this time, it will be deleted.

If you would like us to delete your data sooner, please email hello@engxcel.com to make your request. We will respond to such requests within 28 days.

Data processors and storage

We use Fidelo School management software, provided to us by Fidelo Software GmbH, to keep a record of your information and manage your bookings with us. The data is stored in Fidelo's secure servers within France and Germany. For more information, take a look at Fidelo's privacy policy: https://fidelo.com/en/data_protection_declaration.html

We use a third-party service, Typeform S.L., to create our application forms which are then embedded into our website. We also use Typeform to manage and update our application forms. Personal information you submit to us via this form 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 confirmed, any personal information is deleted from our email client.

We use a third-party service, IRIS, to administer payroll. For more information, take a look at the IRIS privacy policy: <https://www.iris.co.uk/privacy-policy/>

Your data protection rights

We want to make sure you are fully aware of all your data protection rights. You are entitled to the following:

The right to access

You have the right to request copies of your personal data from EngXcel Limited.

The right to rectification


You have the right to request that EngXcel Limited correct any information you believe is inaccurate. You also have the right to request that EngXcel Limited complete the information you believe is incomplete.

The right to erasure

You have the right to request that EngXcel Limited erase your personal data, under certain conditions.

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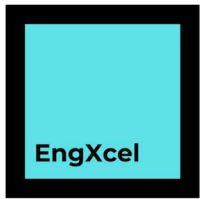
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The right to restrict processing

You have the right to request that EngXcel Limited restrict the processing of your personal data, under certain conditions.

The right to object to processing

You have the right to object to EngXcel Limited's processing of your personal data, under certain conditions.

The right to data portability

You have the right to request that EngXcel Limited transfer the data that we have collected to another organization, or directly to you, under certain conditions.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us using the details in the **How to contact us** section below.

How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us using the following details or using our website [contact form](#).

Email: hello@engxcel.com

Post: DPO
EngXcel Limited
Future Business Centre Cambridge Guildhall
Cambridge
CB2 3QJ

Phone: +44 (0)1223 856721

How to contact the appropriate authority

We take your privacy seriously and hope this policy provides assurance that your information is safe in our hands. If you have any questions or concerns, please contact us at hello@engxcel.com or in one of the other ways listed in the **How to contact us** section above.

If you remain dissatisfied and you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you can contact the Information Commissioner's Office (ICO).

The ICO's address: Information Commissioner's
Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

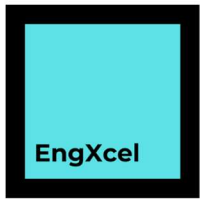
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Changes to our privacy policy

We keep our privacy policy under regular review and place any updates on our website (<https://www.engxcel.com/privacy>). This privacy policy was last updated on 31 October 2021.

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