

GENERAL PRIVACY NOTICE

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by *the Data Protection Bill/Act 2017 the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act 1998.*

When you visit the site, we recognise only your domain name and not your e-mail address. We will see your e-mail address only if you fill out the contact us submission form, send us an e-mail message or send us your email address. If you provide personally identifiable information about yourself such as your name, address, telephone number (“personal information”) by registering on a page, by completing a contact us submission form, by filling out a survey, by emailing us or otherwise by voluntarily telling us about yourself or your activities, we will collect and retain that personal information.

Who are we?

This Privacy Notice is provided to you by Language Cubes Ltd (LC), which is the data controller for your data. This means it is responsible to you for how it processes your data.

A description of what data is processed and for what purpose is set out in this Privacy Notice. In the rest of this Privacy Notice, LC use the word “we” to refer to the company, as appropriate.

What data do we process?

- Names, titles, and aliases;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our business, or where you provide them to us, we may process demographic information such as gender, age, date of birth, nationality, education/work histories, academic/professional qualifications and language capability;
- Where you pay personally for Language Cubes or other related products, financial identifiers such as bank account numbers, payment card numbers and payment/transaction identifiers;

How do we process your personal data?

We will comply with our legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- to enable us to meet all legal and statutory obligations;
- where from time to time we may carry out research on how children use the Language Cube or related language learning products, we carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- To maintain our own accounts and records;
- To seek your views or comments;
- To notify you of changes to our products and personnel;
- We may also use your personal information to contact you occasionally to notify you about important changes to the site, new services we will be providing events or articles we think will be of interest to you. We may also send you our regular updates by email.
- In addition to the purposes set out above we may use the personal information for marketing purposes and market research. This will help us improve our services and the content of the site.

Non-Personally-Identifiable Information

We may collect information about you that is not personally identifiable, such as the type of internet browser and operating system you use, or the domain name of the website or the advertisement from which you linked to our website

When you view the site we may store some information on your computer. This information will be in the form of a "Cookie". "Cookies" are small pieces of information that are stored on your browser on your computer's hard drive. Our cookies do not contain any personally identifying information, but they do enable us to tailor the site or advertisement to reflect your interests and preferences. Most web browsers automatically accept cookies, but you can usually change your browser to prevent all Cookies or receive a warning before a Cookie is stored.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as statutory officials). An example of the latter would be any safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the purchase of language cubes by you

personally.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data our agents, servants and contractors. For example, we may ask a commercial provider to send out information or products on our behalf, or to maintain our database software.

We do not sell, trade or rent personal information to third parties.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

2. The right to correct and update the information we hold on you If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).



4. **The right to object to processing of your data** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. **The right to data portability** You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
6. **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought** You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. **The right to object to the processing of personal data where applicable**
8. **The right to lodge a complaint with the Information Commissioner's Office**

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller: Ivan Royle
Email: ivanroyle@languagecubes.com

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.