

Privacy Notice

This privacy notice explains how we (Education Together Ltd, trading as Embrace England) collect, use, store, and protect your personal information, and outlines your rights under UK data protection law.

We are the controller of your personal data, which means we are responsible for how it is collected and used. For more details about data controllers under UK law, visit https://ico.org.uk.

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1. Contact details

- Telephone: +44 7562185095
- Email: admin@embraceengland.org

2. What information we collect, use, and why

We may collect or use the following information for student education and welfare:

- Names and contact details for students, parents, carers and homestay hosts
- Date of birth, gender, pronoun preferences
- Next of kin and emergency contact information
- Dietary requirements and Health information
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments)
- Welfare information (includes family and home life circumstances and history)
- · Details of any criminal convictions
- Photographs
- Attendance and reason for absence data
- Progress reports, Exam Results & Qualifications
- Information relating to compliments and behavioural information
- Account access information where applicable
- Payment details and financial information including transactions

We may collect or use the following information for updates or marketing purposes:

- Names and contact details
- Marketing preferences
- Photographs
- Website user information where applicable
- Records of consent, where appropriate
- Alumni records



We collect or use the following information for recruitment purposes:

- Contact details
- Date of birth
- Copies of passports or other photo ID
- Educational history (e.g. qualifications)
- Details of any criminal convictions (e.g. DBS records)
- Employment history (e.g. job application, employment references or secondary employment)

We collect or use the following information to comply with legal requirements:

Identification documents

- Health and safety information
- Criminal offence data
- Safeguarding information
- Any other personal information required to comply with legal obligations

3. Lawful bases and data protection rights

Under UK data protection law, we must have a lawful basis for collecting and using your personal information. Depending on the situation, we may rely on one or more of the following lawful bases:

- **Consent** for example, where you agree to us using photographs or receiving marketing updates. You can withdraw your consent at any time.
- **Contract** where processing is necessary to deliver the services we provide, such as arranging homestay accommodation, managing welfare support, or processing payments.
- **Legal obligation** where we must process data to comply with the law, such as safeguarding duties, immigration checks, or financial reporting.
- **Vital interests** where processing is necessary to protect someone's life or health, for example in a medical emergency.

Your rights under the UK GDPR depend on the lawful basis we rely on. In most cases, you have the following rights:

- Right of access to request a copy of the personal information we hold about you.
- **Right to rectification** to ask us to correct or update inaccurate or incomplete information.
- **Right to erasure** to ask us to delete personal information where we are not required to retain it by law.
- Right to restrict processing to limit how your data is used in certain circumstances.
- **Right to object** to object to processing that is based on our legitimate interests or for direct marketing.
- Right to data portability to request that your personal data be transferred to another
 organisation in a commonly used format.
- **Right to withdraw consent** to withdraw your consent at any time where processing is based on consent.

We will respond to all data protection requests within one month. To make a request, please contact us using the details at the top of this notice. For more information about your rights and any exemptions that may apply, you can also visit the ICO website: https://ico.org.uk.



4. Where we get personal information from

- Directly from you
- Parents or carers
- Education establishments
- Agents supporting study opportunities

5. How long we keep your information for

We have a legal responsibility to consider the length of time we retain information for. In so doing we commit to deleting and/or anonymising personal data as following:

- For information held for marketing purposes, not longer than 36 months after it was originally obtained, unless further consent is obtained or we are required by law to hold information for a longer period.
- For information held in relation student welfare and support, we will hold information for the
 duration of the student's stay with us, and for up to 24 months afterwards.
 For information held in relation to recruitment and relating to those providing services on our
 behalf (notably homestay hosts), we will hold information for as long as they are actively involved
 with us, and for a period of 36 months thereafter. If they are inactive for a period of 36 months (for
 example do not engage in student hosting), the information will be deleted, unless further
 consent is obtained or we are required by law to hold information for a longer period.

Please note: in some cases we may need to keep certain information for longer if required by law (for example, for safeguarding or financial reporting purposes).

6. Those with whom we share your information

- Parents and carers
- Teachers and other employees of educational establishments
- Agents supporting study opportunities
- Those providing homestay accommodation
- Third party organisations delivering services on our behalf. (e.g. Hotels and hostels providing accommodation during residential experiences)
- Organisations we need to share information with for safeguarding reasons
- Organisations we're legally obliged to share personal information with

7. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO by writing to: Information Commissioner's Office, Wycliffe House, Wilmslow, SK9 5AF.

• Helpline number: +44 303 123 1113

• Website: https://www.ico.org.uk/make-a-complaint

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