

# Data Promise

This is the general privacy policy for Instill Education Ltd., and for a range of services we provide through this website and the websites of our individual applications (sites). Instill Education Ltd. is a collection of language schools owned by OISE Limited. The schools in the collection are as follows: OISE Oxford, OISE Cambridge, OISE Bristol, OISE London, OISE Young Learners, OISE Boston, OISE Paris, OISE Heidelberg, OISE Segovia, NewburyHall International Study Centre, Regent Oxford, Regent London, Regent Brighton, Regent Cambridge, Regent Edinburgh, Regent Scanbrit in Bournemouth, Regent Summer Schools, Harven School of English, Central School of English, Edinburgh School of English, Eckersley School of English, Basil Paterson College, Basil Paterson Middle School, Pilgrims Language Courses, Pilgrims Young Learners, Pilgrims Teacher Training, MLS Montreal, CISL San Francisco.

At Instill Education Ltd we collect different types of information about our clients for four main reasons:

1. To provide personalised services unique to individual users;
2. To help us to monitor and improve the services we offer;
3. To keep clients up-to-date about the courses and services they have purchased or subscribed to;
4. To fulfil contracted services.

Some of our courses may have their own specific privacy policy because the courses we provide in that instance are different. So please do check when you sign up or register just to be sure you know what is happening to your information.

To make it easier for you to read this policy, here is a list of the particular sections.

1. About us
2. Registering as a subscriber
3. Other uses of your data
4. Updating your personal information
5. Who we share data with
6. Use of Cookies
7. About our advertising
8. Legal information and how to contact us
9. Changes to this Data Promise

## 1. About us

1. The protection of your privacy and personal information is important to us. We make sure that not only do we have appropriate security measures in place, but that any other organisation or contractor we work with to provide a service also meets the same standards as us.
2. We shall respect your privacy. You should receive our information emails only from us. We will make sure that the boxes you need to tick if you are happy to receive marketing information, are presented clearly and at an appropriate time.
3. We shall make it clear at the point when we request your information, what we are collecting it for and how we are going to use it.
4. We shall collect and use your personal information only if we have your permission or we have sensible business reasons for doing so, such as collecting enough information to manage your course booking.

5. We shall minimise the amount of information we collect from you to what we need to deliver the course and ancillary services (e.g. accommodation, travel, private car services etc) you requested.
6. We shall be clear in our dealings with you as to what information about you we will collect and how we will use it.
7. We shall use personal information only for the purpose for which it was originally collected and we will make sure we delete it securely.
8. Our websites are accessible via the internet. Please remember that if you post any comments or links on any of our sites that they can be read and accessed by anyone and everyone.
9. If we, or our partners transfer any information out of the European Economic Area (EEA), it will only be done with the relevant legal instruments or permissions being in place.

What information do we collect about you and how do we use it?

We collect information on you:

- when you register for a course (including live streamed events)
- when you contact us for information
- when you work with us in a commercial capacity
- when you sign up for a newsletter
- when you subscribe to a paper or digital magazine
- when you download an application
- when you use the websites through Cookies
- if you choose to reveal information on postings
- if you complete your details on research questionnaires, and
- when you enter promotions and competitions.

Certain services that we provide may involve us collecting extra information (your location, allergies etc), so that we can tailor the information we give you. This may also apply to certain apps that you download, or which we provide.

What legal basis do we use for processing your data?

We use different legal bases depending upon the purpose for collecting your data in the first instance.

- For all data collected to sign up for a course or information about courses, we process the data using Legitimate Interest, i.e. you are able to access an extensive range of information in exchange for supplying your information, and we have a relationship where the balance of benefits is in your favour. You always have a choice in the management of your data in this manner and you can opt out of processing under this basis at any time.
- Where you provide data in the course of purchasing a course we process your data under Contract, i.e. your data is necessary for the fulfilment of the service. Any additional contact, i.e. telling you about another course closely related to the one you have chosen, is managed under Legitimate Interest.
- Any secondary processing of your data, i.e. sharing with third parties involved with the delivery of the course, such as Homestays etc, is managed under Consent.

Under the terms of current data protection legislation, we will always make it as easy as possible for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the course and service you have requested.

## Profiling

From time to time we may use some elements of the data you supply to target the messages we send you. For example, we may use your location to send you information about an event which is happening in the same country, or we may use your company type to send you a relevant news story.

None of the information is collated by wholly automated means and the rights and freedoms of the data subject are safeguarded by suitable measures.

How long do we hold on to your data?

Because we collect data from a wide range of purposes, we do not have a singularly defined retention period. For each individual course and service we define a carefully assessed timeframe within which we retain your data.

After this, data is managed to ensure it is either erased from our system, minimised and retained for legal reasons or pseudonymised and retained on a global suppression list to ensure that you do not receive unwanted messaging from us.

## 2. Registering as a subscriber

The minimum information we need from you to register you with Instill Education Ltd. is your name, phone number and email address. We will ask you more questions for different services, including educational emails. Unless we say otherwise, you are required to answer all the registration questions.

We will process data collated for the purpose of facilitating your registration on the basis of Legitimate Interest to deliver the course for which you have registered. We will also, on this basis, contact you occasionally about other relevant courses or services which we think will interest you. You always have a choice and can opt out of processing on this basis at any time by contacting us at the number/email address at the end of point 8.

## 3. Other uses of your data

With your permission we may also send you emails from other parts of our organisation which we think might interest you. At any time you can decide not to receive these emails and will be able to 'unsubscribe'.

We shall never sell your data. We will only share your data with third parties in order to provide the course or service that you requested.

### Use of children's data

We only collect or store any personal information about children under the age of 16 in the context of booking a course. This is applicable to young people aged under 16 where permission is obtained directly from a legal adult guardian to collect this information.

## 4. Updating your personal information

Under current data privacy legislation, you have the right to rectify, erase or restrict the processing of your data without undue delay. You may also request access to the data we hold on you.

To do this or to update your personal information at any time, please contact our database manager using the details at the bottom of point 8.

## 5. Who we share data with

Your personal information may be shared with other schools within the group of Instill Education Ltd. For example, when there is a direct crossover between courses and services.

We shall not share your information with others for marketing purposes unless you have given us your permission. If we have your permission we will share your information only with other schools within the Instill Education group.

We can access and release personal information to keep to relevant laws and government requests, to operate systems properly and to protect both us and our users.

Any other organisations who access your information in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your information and keep to data protection and privacy laws which apply. We may also independently audit the service providers to make sure that they meet our standards. We may use service providers to help us run these sites (or services available on these sites), some of which may be based outside the EEA (European Economic Area) or countries deemed adequate by the EDPB (European Data Protection Board).

## 6. Use of Cookies

We use Cookies for a number of reasons:

1. For statistical purposes to track how many users we have and how often they visit our websites. We collect information listing which of our pages are most frequently visited, and by which types of users and from which countries.
2. We use other organisations to collect anonymous user information, sometimes through Cookies and web beacons, (information embedded in images which allow them to analyse how the website is being used and the number of visitors).
3. Placing Cookies on your computer means we can show you information that you might be interested in, and allows us to control the number of times you see them and measure how effective the campaign has been.
4. We may use Flash Cookies to store your preferences for your media player (for example, volume and so on). If we do not use them, you may not be able to watch some video content.
5. You can turn Cookies off but if you do, you may not be able to use all of the services on our websites and you might see more pop-ups and other advertising. This is because we won't be able to limit what you see by using Cookies. However, you will still be able to see our editorial content.
6. Any of our schools in Instill Education may use Cookies to suggest and deliver content which we believe will be of interest to you.

For more information about Cookies and managing them, including how to turn them off, please visit our page on Cookies.

By using the sites you are agreeing to the use of Cookies as described.

## Google Analytics

We use Google Analytics on our sites for anonymous reporting of site usage and for advertising on the site. If you would like to opt out of Google Analytics monitoring your behaviour on our sites please use this link <https://tools.google.com/dlpage/gaoptout>

## 7. About our advertising

We may share anonymised behavioural data with advertising partners. This may mean that when you are on other websites, you will be shown advertising based on your behaviour on one of the Instill Education schools sites. We may also show you advertising on our site based on your behaviour on other sites.

If you want to opt out of receiving online behavioural advertising, this does not mean you will no longer receive advertising when you are using our sites. It just means that the advertising you see will not be customised for you.

Sometimes we also use Google Adwords Remarketing and Similar Audiences, LinkedIn Matched Audiences and Facebook Lookalike Audiences services to advertise on third party websites (including Google, LinkedIn and Facebook advertising networks) to previous visitors to our site or users with similar interests. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry, or users with interests like our previous visitors.

This could be in the form of an advertisement on the Google search results page, on a site in the Google Display Network, or on Facebook and/or LinkedIn advertising networks. Third party vendors, including Google, LinkedIn and Facebook use Cookies to serve ads based on someone's past visits to the website. Of course any data collected will be used in accordance with our own privacy policy and third parties advertising networks' privacy policy.

If you wish to opt out from Google Remarketing and Similar Audiences you can do so by visiting Google's Ads Setting here: [support.google.com/ads/](https://support.google.com/ads/)

If you want to opt out of receiving Online Behavioural Advertising, this does not mean that you will no longer receive advertising when you are using our sites. It just means that the advertising you see will not be customised for you. If you would like more information about OBA and how to opt out of it, please visit [youronlinechoices.com](https://youronlinechoices.com) or [optout.networkadvertising.org](https://optout.networkadvertising.org) (if accessing from the US).

Advertising on mobile devices may require the collection and sharing of the unique device ID with companies who purchase advertising space on the mobile application.

## 8. Legal information and how to contact us

Under the currently applicable laws we have to say who the 'Data Controller' is for Instill Education schools products and services provided via our websites, our magazines, events and other products and services. Instill Education Ltd. is the registered data controller under the Data Protection Act 1998. The data manager is the organisation's responsible person for protecting information and in our case is Mr Nick Kenny.

If you would like access to or a copy of the personal information we hold about you, to request a correction or have any questions about how we may use it or to make a complaint, please contact the Data Manager, Mr Kenny, by email at [helpdesk@oise.com](mailto:helpdesk@oise.com) or telephone +44 1865 258300.

Requests will be dealt with by the Data Manager, and will be responded to within a reasonable period, not longer than 30 days.

If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority – details of which are given below:

Information Commissioner's Office

<https://ico.org.uk/concerns/>

Telephone: +44 303 123 1113

## 9. Changes to the Data Promise

If we make changes to the Data Promise, we will show you what they are here. If these changes are significant, we may also choose to email relevant individuals with new details. If we are required by law, we will obtain your consent to make these changes.

May 2018 - New company privacy policy created