

Privacy Policy

Purpose and Scope

This document sets out the privacy policy for the Teach and Travel Group Ltd (TATG). TATG is part of the learndirect Digital Group and also trades under the brand names i-to-i and LoveTEFL. This policy applies across all of our brands and trading names and, unless explicitly stated otherwise, a reference to any one of these names should be regarded as a reference to all four trading / brand names. If you consent to receiving communications from us, you may see one or more of these names on our communications.

This Privacy Policy sets out what information we collect, how we collect it, and what we do with it. This policy applies to you and is available on our website and through other channels. In all your dealings with us you must ensure that any other persons you represent are aware of the content of our Privacy Policy and consent to your acting on their behalf.

Responsibility

The Teach and Travel Group Limited (part of the learndirect Digital Group) is the data controller your personal data. The Finance and Legal Director holds ultimate responsibility for this policy.

Contact details

The contact details for the Teach and Travel Group are:

Registered address: Suite 2, Chantry House, Victoria Road, Leeds, LS5 3JB

Telephone number: 0113 205 4610

Email address: tefl@i-to-i.com

Definitions

The terms **'your information'** and **'your personal data'** refer to any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, sex and gender
- Contact Data includes billing address, delivery address, email address and telephone numbers
- Financial Data includes bank account and payment card detail.

- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- Usage Data includes information about how you use our website, products and services
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data

We may also need to obtain data within Special Categories of Personal Data about you, and to pass this on to our overseas partner if you are travelling overseas. This might include, for instance, information about your health (which may be needed to help you or to assess your working capacity whilst you are overseas) or information conveyed by photographs.

We will only request and process data within these Special Categories if one of the reasons set out in Article 9(2) of the GDPR applies, as well as the reasons set out above that apply in relation to all personal data. Please note that:

- We will explain the need for health information in phone calls to you and your answers may be recorded
- We will typically ask for details of health conditions and a doctor's letter to confirm you will be fit for work and able to access the necessary medication prior to your acceptance by the overseas partner
- If you disclose a health condition that may render you unfit for work overseas, you will have the option of discussing this with us further and we will keep a record of that discussion and pass details to our overseas partner.

We will strive to ensure that there are adequate safeguards to your personal data when it is transferred outside the EEA.

Criminal Offence Data

If you plan to teach overseas, the local schools and/or our overseas partner may require disclosure to them of your criminal offence data so that they can fulfil their obligations to their students and staff. Please note that:

- We may explain this to you in our phone calls with you, and your answers may be recorded
- We will typically ask you for this by sending you a request for an enhanced CRB disclosure
- If your CRB disclosure discloses an offence but it is possible that our overseas partner may still accept you on to its program, we may invite you to disclose further details of the offence and the circumstances surrounding it so that we may pass on this explanation to our overseas partner and local school or other institution.

We will strive to ensure that there are adequate safeguards to your personal data when it is transferred outside the EEA.

General Principles About Transferring Your Data Outside the EEA

For a contract between us and you, we may transfer personal data overseas if the transfer is:

- Necessary to carry out the contract; or
- A necessary part of the steps you have asked us to take before a contract is made between us.

For a contract between us and our overseas partners, we may transfer personal data overseas if:

- You request this or it is in your interests; and
- The transfer is necessary to conclude the contract; or
- The transfer is necessary to carry out such a contract.

For the avoidance of doubt, it is not possible for us to send candidates abroad to teach without making disclosures of personal data to our overseas partners.

Outside the European Economic Area (EEA), data protection controls may not be as strong as the legal requirements in this country.

How We Collect Your Personal Data

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- apply to take a course, work abroad or apply for another of our products or services
 - submit assignments or confirm your identity through our learning platform
 - use our website/apps, link to or from our website/apps
 - connect with us via social media
 - subscribe to our service or publications
 - request marketing to be sent to you
 - enter a competition, promotion or survey; or
 - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

We may also receive Technical Data about you if you visit other websites employing our cookies.

Our Use of Your Information

We will use your personal data only on one of the following grounds set out in the GDPR:

- You have given your consent to the processing of your data for one or more specific purposes (Article 6(1)(a)). This will apply chiefly to our marketing activities although we may also seek your specific consent in relation to special categories of personal data
- It is necessary for entering into or performing a contract between you and (i) TATG or (ii) our overseas partner (Article 6(1)(b))
- It is necessary for compliance with a legal obligation to which we or our overseas partner is subject (Article 6(1)(c))
- It is necessary to protect your or another person's vital interests (Article 6(1)(d))
- It is necessary for the purposes of legitimate interests pursued by us or by a third party (such as our overseas partner), except where these interests are overridden by your interests or your fundamental rights and freedoms which require protection of personal data (Article 6(1)(f)).

Please note:

- (1) For the purpose of providing you with our support services in connection with your flight, security, incident/accident management or insurance, etc, we may disclose and process your information outside the UK/EEA.

In order for you to travel abroad, it may be **mandatory** (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your information for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. Some countries will only permit travel if you provide your advance passenger data (for example Caricom API and US secure flight data). These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate.

- (2) We may collect and process your information for the purposes set out below and in our registration with the Office of the Information Commissioner, and disclose the same to our group companies for business purposes and also to companies and our service providers who act as “data processors” on our behalf, or to credit and fraud agencies (some of whom are located outside the UK/EEA).

These purposes include administration, service, quality and improvement-related activities, customer care, product innovation and choice, business management, operation and efficiencies, re-organisation/structuring/sale of our business (or group companies), risk assessment/management, security, fraud and crime prevention/detection, monitoring, research and analysis, social media, reviews, advertising and marketing, loyalty programmes, profiling customer purchasing preferences, activities and trends, dispute resolution/litigation, credit checking and debt collection.

- (3) Information (such as health or religion) may be considered “sensitive personal data” under the Data Protection Act 2018. We collect it to provide you with our services, cater to your needs or act in your interest, and we are only prepared to accept sensitive personal data on the condition that we have your **positive consent**.

By booking with us you also agree for your insurers, their agents and medical staff to exchange **relevant** information and sensitive personal data with us in circumstances where we/they need to act on your behalf or in the interest of passengers or in an emergency.

If you do not agree to Our Use of Your Information above, we cannot engage/do business with you or accept your booking.

Our Use in Relation to Marketing Material

You will receive marketing communications from us:

- By email or text, if you have requested information from us (for instance you have requested or downloaded one of our brochures) or purchased services from us (for instance by signing up to one of our courses) or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing; and
- By telephone, unless you are registered with the Telephone Preference Service (TPS).

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside the company for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of Use

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out above:

- Our overseas partners and the schools abroad
- The qualifications Awarding Organisation (Gatehouse Awards)
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law applicable in their jurisdiction. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we will use our best endeavours to ensure a similar degree of protection is afforded to it by using the European Commission: Model contracts for the transfer of personal data to third countries or contracts with the closest effect to those provisions where the model contracts are not suitable.

How Long Do We Keep Your Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For instance:

- By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes
- In some circumstances you can ask us to delete your data: see (Request erasure) below for further information
- If we are sending you marketing messages but you have not engaged with them (eg by opening them) within a reasonable period (currently two years) and you are not a customer, we will purge your details from our marketing databases
- If we have awarded you a qualification after you have done a TEFL course, we will keep your details for so long as is necessary to verify your certification
- In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Rights and Our Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy
 - (b) where our use of the data is unlawful but you do not want us to erase it
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Use of Tools / Cookies and Links to Other Websites

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Monitoring

To ensure that we carry out your instructions accurately, improve our service and for security and fraud, we may review, monitor and/or record:

- (1) Telephone calls
- (2) Activities using CCTV in and around our premises
- (3) Transactions and activities at all points of contact
- (4) Web, social media and app traffic, activities, etc.

All recordings and derivative materials are and shall remain our sole property.

Security Statement

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Review

Any changes to this Policy will be either posted on our website, brochure and/or made available on request. This version was last updated in November 2020. Please contact us if you would like to review earlier versions of the Privacy Policy.