## **Privacy Policy**

Ammatti.UK Ltd. (we, us, our) is committed to protecting and respecting your privacy. We take the privacy of all of our customers and site users seriously and take great care to protect your personal information.

## **Company Information**

3 Hollowmoor Heath, Great Barrow, Chester, CH3 7LG Email: info@ammattiuk.com

# Privacy & General Principles

Our Privacy Policy governs any kind of processing where we are acting as a data controller or cocontroller (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons. This policy applies to our processing of data collected through any means, actively as well as passively from persons located anywhere in the world. Any question regarding our processing of personal data may be directed to the Director, Ammatti.UK Ltd., 3 Hollowmoor Heath, Great Barrow, Chester, Cheshire, CH3 7LG. Please read the following policy carefully to understand what information we may collect from you, how we may use it, and your rights in respect of our use.

We will be guided by the following principles when processing data:

• We will only collect data for specific and specified purposes; we will 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.

• We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required.

• We will collect and use your personal information only if we have sensible business reasons for doing so, such as managing a booking or gathering necessary information about a new member of staff, ETO or homestay.

• We will not use data for purposes other than that for which the data was collected, except as stated herein, or with prior consent;

• We will seek to verify and/or update data periodically, and we will accept requests for amendments of personal data;

- We will apply high technical standards to make our processing of data secure;
- Except when stated herein, we will not store data in identifiable form longer than is necessary to accomplish its purpose, or as is required by law.

# Information collected

We collect information on you:

- When you apply to join a course or programme
- When you contact us for information, via our website, by email, by phone, in person or via social media channels.
- When you work with us in a commercial capacity (for example as an ETO or partner)
- When you apply to be a homestay host
- When you apply to work at Ammatti.UK, and when you are subsequently employed by Ammatti.UK.
- If you post on our social media channels or on our website or blog

#### Legal bases for processing your data

The General Data Protection Regulation (GDPR) establishes 6 legal bases on which we can process your data: these are Consent, Contract, Legal Obligation, Vital Interests, Public Task and Legitimate

Interests. For further information about these legal bases and fuller definitions, please refer to the ICO website.

We use different legal bases for processing your data depending on the purpose for collecting your data in the first instance:

• For all data collected as part of the process of enquiring about, applying for and booking a course or for any other related service (e.g. homestay, airport transfer, social programme, insurance to cover you during your stay, or where you give us feedback about aspects of this provision, we process using Contract or Legitimate Interests, namely the fulfilment of the booking. This may include sending of your data to our partners such as Educational Tour Operators (ETOs). Where required by law to do so, we may also process your data under Legal Obligation.

Any processing of customer data not directly related to the fulfilment of a booking or related services, such as signing up for blog updates on our website, or sending messages to you on behalf of third parties, is managed under Consent. From time to time, we may use elements of the data you supply to target the messages we send to you. For example, we may use your location to send you information about an event or opportunity happening in your area. During your stay we may take photographs or videos of you, and the use and processing of these is also managed through Consent.
For all data collected as part of managing our relationship with commercial partners, such as ETOs, Government Agencies and Schools, we process using Contract, Legitimate Interest and Legal Obligation, namely the maintenance of the commercial relationship. As newsletters to commercial partners are an important part of how we communicate with them, these are managed under Legitimate Interest.

• For all data collected as part of the process of employing and managing staff, we process using Contract, Legal Obligation and Legitimate Interests, namely the employment of the employee. This will include data required for HMRC, pensions, insurance (including staff health insurance cover). As newsletters to our staff are an important part of how we communicate with them, these are managed under Legitimate Interest.

• For all data collected as part of the process of recruiting and managing homestay providers, we process using Contract, Legal Obligation and Legitimate Interests, namely the maintenance of the relationship with the homestay.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is Legitimate Interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is Legitimate Interest, namely the proper protection of our business against risks.

We will make it as easy as we can for you to opt out of unwanted processing under Consent, providing it does not restrict our ability to provide you with the primary service you have requested. We collect data for a wide range of purposes. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or minimised and retained.

We are co-processors of information relating to marketing and booking clients with partners overseas (for example ETOs, schools, government and national sponsors). As such, we may transfer some data outside of the EU, but this will be limited to data necessary for the performance of a contract made in the interests of the individual (which is an exemption to the 8th principle of the GDPR legislation). We remain responsible for the data held, processed or sent via our systems. We are not responsible for the security and processing of data which is held, processed or sent via our partners' systems.

However, we require all of our partners overseas to confirm that they will process data securely in line with the requirements of GDPR or the equivalent in their country. We do not sell your data at any time.

## Special Category Data/Criminal Record Data

We may request health data from potential clients and employees. This data has special protection under the GDPR under the specific conditions listed in Article 9 (2) of the GDPR that processing is necessary either to protect the vital interests of the data subject, (or of another natural person where the data subject is physically or legally incapable of giving consent), or where processing is necessary for the purposes of preventive or occupational medicine or the assessment of the working capacity of an employee.

#### Information collected via our website

How we will use information collected by our website We may use information held about you in the following ways:

- To process a booking for one of our courses or products.
- To manage and application to work for the company, or to be a homestay.
- To create a profile for you to help us provide a more personalised service which is suited to meet your preferences.
- To ensure that content from our site is presented in the most effective manner for you and your computer.

• To send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

#### Links from our website

Our website may contain links to and from websites operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies and that we do not accept any responsibility or liability for these policies. We advise you to check these policies before you submit any personal data to these websites.

#### Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use a single cookie, "sessionid", to identify you when you visit our website, keep you logged in as you navigate our website, and store temporary information during the course application process. This functional cookie does not identify any individual, and is required for the correct operation of our website.

Our service providers use cookies and those cookies may be stored on your computer when you visit our website. These cookies do not contain any information that is personally identifiable to you. Our service providers are listed below - click to view their privacy policies:

- Google Analytics used to analyse the usage of our website.
- Google Translate provides a translation service to our website visitors.
- Facebook used to offer "like" and "share" buttons to like/share pages from our website on Facebook.

- Twitter used to offer "follow" buttons to follow Ammatti.UK on Twitter.
- LinkedIn used to offer "follow" buttons to follow Ammatti.UK on LinkedIn.
- YouTube used to embed videos on our website.
- LiveChat provides a chat service to our website visitors.

• Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- https://support.google.com/chrome/answer/95647?hl=en (Chrome);
- https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
- http://www.opera.com/help/tutorials/security/cookies/ (Opera);

• https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-managecookies (Internet Explorer);

• https://support.apple.com/kb/PH21411 (Safari); and

• https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

What to do if you believe that the information we have collected and are using is incorrect, you wish to raise a subject access data request or have a concern or complaint about how we store, use or share your personal data?

Initially, we would encourage you to raise this with info@ammattiuk.com ,who should be able to resolve the matter quickly and informally. Complaints will be handled within the statutory guidelines. In the unlikely event that we have been unable to address your concern internally, you may call the Information Commissioner's Office helpline on 0303 123 1113.