

# Privacy Policy

This is the privacy policy of Cambridge Dream Limited, a company incorporated in England and Wales (company number 4882224). Our registered office is The Old Bakery, High Street, Farndon, Chester, CH3 6PU, United Kingdom.

It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.

The member of staff responsible for data protection is the Managing Director of Cambridge Dream Limited, Laura Davies, who can be contacted at <https://www.cambridgedream.com/contact/>.

## Introduction

Cambridge Dream Limited is committed to protecting the security of all our users’ data, including students, parents, group leaders, agents and staff. We handle all personal data collected in line with the data protection principles and the Data Protection Act (DPA 1998) and the General Data Protection Regulation (2018).

Our policy complies with UK law, including that required by the EU General Data Protection Regulation (GDPR). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The definition of personal data shall be that published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/what-is-personal-data/> We are also committed to ensuring that our staff are aware of our data protection policies and legal requirements and that adequate training is provided to them.

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information. You can make a request by contacting us at <https://www.cambridgedream.com/contact/>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected about you or provided by you.

## **The bases on which we process information about you**

You may give us information by filling in forms or by corresponding with us by phone, e-mail, social media or otherwise. The information you give us may include your name, address, e-mail address, phone number, bank details, date of birth, medical and dietary information, subject interests, examination grades, passport details, photo and school.

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **1. Information we process because we have a contractual obligation with you**

When you sign an agreement or agree to our terms and conditions, for example as an education agent or a school, or otherwise buy a product or service from us, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information, such as a name, email address and bank details.

We may use it in order to:

- 1.1. verify your organisation for security purposes
- 1.2. provide you with a service
- 1.3. provide you with relevant advice
- 1.4. transfer a payment

We process this information on the basis there is a contract between us.

Additionally, we may aggregate this information in a general way, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you ask us to provide you with information about our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies or agreeing to the use of a photo for marketing purposes as long as the student is not identified by their full name or contact details.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply or provide a telephone number to be contacted in an emergency when your child is attending a course.

Except where you have consented to our use of your information, we do not use your information in any way that would identify you personally.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by contacting us at <https://www.cambridgedream.com/contact/>.

### **3. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- supporting your visa application to HMVI to attend one of our courses
- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response

## **4. Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request. This may include your personal information.

### **Specific uses of information you provide to us**

## **5. Information provided on the understanding that it will be shared with a third party**

Our website allows you to post your success story with a view to us writing a case study for marketing purposes. You are asked to give your consent for your story, photos and videos to be published.

We do not specifically use this information except to allow it to be displayed or shared. We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it.

## **6. Job application**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date. As stated on the application form, you give your consent to this by signing the application form.

If we offer you a position, we collect information about you, such as bank details and National Insurance number. This information will be used only for purposes directly relevant to your engagement. After your position has ended, we will keep your file for six years to satisfy the tax authorities, before destroying or deleting it.

## 7. Feedback and Complaints

When we receive feedback and complaints, we record all the information you have given to us.

We use that information to resolve your complaint or to assess the level of service we provide, but not in a way that could identify you or any other person.

If your complaint reasonably requires us to contact a third party, such as the British Accreditation Council, we may decide to give to that other person some of the information contained in your complaint.

## 8. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 8.1. to improve server efficiency
- 8.2. to record your enquiries and answers to surveys on our site while you complete them

## Disclosure and sharing of your information

### 9. Visa Applications

To support visa applications, we provide a letter with your personal details, for example full name, passport details, date of birth, which is forwarded to HMVI by you or a third party, such as a school or education agent.

## Access to your own information

### 10. Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by sending us a request at <https://www.cambridgedream.com/contact/>.

After receiving the request, we will tell you when we expect to provide you with the information and whether there will be a fee for this service.

### 11. Removal of your information

If you wish us to remove personally identifiable information from our website or records, you may contact us at <https://www.cambridgedream.com/contact/>.

### 12. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before taking any action. This is important to safeguard your information.

## **13. How you can complain**

If you are not happy with our privacy policy or if you have any complaint then please contact Laura Davies at <https://www.cambridgedream.com/contact/>.

## **14. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 14.1. to provide you with the services you have requested;
- 14.2. to comply with legal requirements, including for the period demanded by our tax authorities;

## **15. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

## **16. Review of this privacy policy**

We may update this privacy notice from time to time as necessary.