

## Conversing in English Privacy Statement

This Privacy Statement was published May 25th, 2018.

At Conversing in English (also known as CiE) we are committed to protect and respect your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679, dated April 27th 2016. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our services and to our sales, marketing and customer contract fulfilment activities. It also applies to individuals seeking a job in Conversing in English.

### Who are we?

Conversing in English SL is an online company which specialises in 1-to-1 online lessons and language services. Our headquarters is located at Carrer de Provenza 7, Bajos 3, 08029 Spain.

Conversing in English SL is the data controller and our Data Protection Officer can be contacted by email: [admin@ConversingInEnglish.com](mailto:admin@ConversingInEnglish.com)

### When do we collect personal data about you?

- When you request your trial lesson
- From public social media. When we collect personal information from other legitimate sources, such as third-party data aggregators, CiE marketing partners, public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.
- At your trial lesson
- During lessons

### Why do we collect and use personal data?

Due to the conversational and flexible nature of our teaching methodology, it is crucial that all teachers in our network are informed and kept up-to-date with students' general and specific information in order to provide a comprehensive and cohesive experience throughout their lesson experience. As well as to be able to carry out the basic procedures of our services.

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We may use your information for the following purposes:

- Send you booking confirmations and lesson reminders which are part of the booking process of the service you have requested.
- Send you lesson summaries after your lessons which are part of the service you have acquired.
- Send you weekly news update: availability updates, monthly testimonials, new teachers in the network, promotions, rate updates, etc. This communication is subscription based and requires your consent.
- Send you monthly account statements as part of the service you have purchased.
- Reply to a 'Contact me' or other web forms you have completed on one of our CiE websites
- Follow up on incoming requests (customer support, emails, chats, or phone or Skype calls).
- Provide you access to, information and services related to a free trial of CiE services.
- Perform contractual obligations such as order confirmation, package details, invoice, account reminders, and similar.
- Notify you about any disruptions to our services or alterations.
- Contact you to conduct surveys about your opinion on our services.
- Process a job application.

## **Our legal basis for collecting personal data**

### **Collecting personal data based on consents**

The collection of personal data based on consent from the data subject will be done by using "Consent Forms" that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems.

### **Collecting personal data based on contracts**

We may use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers.

### **Collecting personal data based on legitimate interest**

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between CiE and the individual person has been identified. This legal basis is primarily related to our teaching purposes. We will always inform individuals about their privacy rights and the purpose for collecting personal data.

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## What type of personal data is collected?

As a student/customer we collect basic personal data such as name, time zone, email addresses, Skype ID. We may also collect other general information from social media profiles, location, feedback, comments, enquiries and requests received from you during lessons or by email.

Here is an example of the type of data that may be collected for your student profile: Nick name, age, photo, location, Skype ID, education/professional background, family, hobbies, notes on English level, objectives, preferred booking times, feedback, how did you find us, use of video in lessons, IT setup.

## How long do we keep your personal data?

We store personal data for as long as we find it necessary to fulfil the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve possible problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data after your last interaction with us. If for some reason your personal data is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

## Your rights to your personal data

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data that CiE holds about you.
- The right to request that CiE corrects your personal data if inaccurate or out of date.
  - If you are a customer or student and you have a registered profile on our system, you may request to update it by email.
- The right to request that your personal data is deleted when it is no longer necessary for CiE to retain such data. Do bear in mind that disposing this data may significantly affect the effectiveness of future lessons as we will not have any information about you.
- The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communications:
  - If you want to withdraw your consent to e-marketing, please make use of the link to manage your subscriptions included in our communication.
  - Please note that students/customers may still receive news updates and administrative communications from CiE, such as bookings confirmations, lesson reminders and notifications about your account activities.

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- The right to request that CiE provides you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
  - The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data.
  - The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing.

Any query about your Privacy Rights should be sent to [admin@ConversingInEnglish.com](mailto:admin@ConversingInEnglish.com)

## The use of cookies

We use cookies in order to make your lesson booking experience more efficient. We only use cookies in our booking module, if cookies are accepted, to remember the last parameters used in your last booking in order to spare you the trouble of having to enter some information repeatedly in each booking.

You can review specific details on our use of cookies in our cookie policy [here](#).

## Do we share your data with anyone?

We do not share, sell, rent, or trade your information with any third parties without your consent, except from what is described below:

### Third-party Service Providers working on our behalf:

Our freelance teacher network will have access to your data for teaching purposes only.

We may pass your information on to our accountants for bookkeeping purposes.

### If required by law:

We will disclose your personal information if required by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

## Changes to this Privacy Statement

CiE reserves the right to amend this Privacy Statement at any time. The applicable version will always be found on our websites. We encourage you to check this Privacy Statement occasionally to ensure that you are happy with any changes.

If we make changes that significantly alter our privacy practices, we will notify you by email prior to the change taking effect.

## **Your right to complain with a supervisory authority**

If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact [admin@ConversingInEnglish.com](mailto:admin@ConversingInEnglish.com)

If you remain dissatisfied, then you have the right to apply directly to your national supervisory authority for a decision.