



PRIVACY POLICY

OVERVIEW

Global Camps understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.globalcamps.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site and you will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. DEFINITIONS & INTERPRETATIONS

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site; "Data Protection Legislation" means (i) the Data Protection Act 1998, until the effective date of its repeal (DPA) (ii) the General Data Protection Regulation ((EU) 2016/679) (GDPR) and any national implementing laws, regulations and secondary legislation, for so long as the GDPR is effective in the UK, and (iii) any successor legislation to the Data Protection Act 1998 and the GDPR, in particular the Data Protection Bill 2017-2019, once it becomes law.

2. INFORMATION ABOUT US

Our Site is owned and operated by Languages for All Ltd, a company registered in England under number 09610402, whose registered office is at 27 Old Gloucester Street, London, WC1N 3AX.

Data Protection Officer: Philip Haynes

Email address: phil@globalcamps.co.uk

Telephone number: 03330 067 413

Postal Address: 27 Old Gloucester Street, London, WC1N 3AX

3. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.



4. WHAT IS PERSONAL DATA?

Personal data is defined by the GDPR as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. WHAT ARE MY RIGHTS?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 14.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 14 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 14.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.



6. WHAT DATA DO WE COLLECT?

Depending upon your use of Our Site, we may collect some or all of the following personal:

Name;
Date of birth;
Gender;
Address;
Email address;
Telephone number;

7. HOW DO YOU USE MY PERSONAL DATA?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you or because you have consented to our use of your personal data. Your personal data will be used for the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying our services to you.
- Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by managing your account preferences).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone and text message with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated systems for carrying out certain kinds of profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 14.

- The following automated profiling may take place:
 - Recognising your child's upcoming birthday and highlighting it to clubs that they attend
 - Using class, location, age, booking status, payment status and other status level information to enable filtering of information.



8. HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Name and contact details for each data subject (parent) - 5 years
- Data subject (parent) and/or (child) address - 5 years
- Data subject (child) name, date of birth and gender - 5 years
- Name, telephone number and relationship to child for emergency contacts - 5 years
- Any medical information that a parent deems relevant to their child's participation in classes - 5 years
- Answers to any additional questions that a specific club deem relevant to their Club or activity - 5 years
- Notes taken by a Club connecting to a specific data subject (child) - 5 years

9. HOW AND WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law. From time to time it may be necessary to store or transfer personal data outwith the EEA and where such storing or transferring is required we will only do so in accordance with the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Personal data may be transmitted over secure networks only, transmission over unsecured networks is not permitted in any circumstances;
- Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted using permanent deletion of the email from trash;
- Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient; and
- All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked "confidential".
- No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on our behalf requires access to any personal data that they do not already have access to, such access should be formally requested from Philip Haynes phil@globalcamps.co.uk, tel: 03330 067 413;
- No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on our behalf or not, without the authorisation of Philip Haynes phil@globalcamps.co.uk, tel: 03330 067 413;



10. DO YOU SHARE MY PERSONAL DATA?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. HOW CAN I CONTROL MY PERSONAL DATA?

11.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your Account.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. CAN I WITHHOLD INFORMATION?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

13. HOW CAN I ACCESS MY PERSONAL DATA?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.



14. HOW DO I CONTACT YOU?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: info@globalcamps.co.uk

Telephone number: 03330 067 413

15. CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

You will be informed of any changes immediately and you will be deemed to have accepted the terms of the Privacy Policy following the alterations unless otherwise stated to us in writing.