

Kaplan International Privacy Notice for Hosts / Homestay Providers

Introduction

Kaplan International English is committed to maintaining the privacy and security of your personal data as a host of one of our students. This Privacy Notice explains how we collect, use, share and protect your personal data.

It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below:

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1. Who we are

Kaplan International English is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. Where we act as a data controller, we are required under data protection legislation to notify anyone who provides personal data to us, either directly or through a third party, of the information contained in this Privacy Notice.

Kaplan International English is the trading name for Aspect International Language Academies Limited (company number 02162156 and registered address at 2nd Floor Warwick Building, Kensington Village, Avonmore Road, London W14 8HQ) so when we mention “Kaplan”, “we”, “us” or “our” in this Privacy Notice, we are referring to this company which is responsible for processing your data.

2. Data Protection Officer

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about

this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Contact details

Name of DPO: Rachael Convery

Email address: dpo@kaplaninternational.com

Postal address: 2nd Floor, Warwick Building, Kensington Village, Avonmore Road, London W14 8HQ.

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.

3. What is personal data?

Personal data is any information about an individual from which that individual can be identified. Your name, address, phone number and bank account number are examples of personal data. It does not include data where the identity has been removed (anonymous data).

4. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a **contract** we have entered into with you.
- Where we need to comply with a **legal obligation**.

- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be less common:

- Where we need to protect your **vital interests** (or someone else's interests).
- Where it is needed in the **public interest** or for official purposes.

Generally we do not rely on **consent** as a legal basis for processing your personal data other than in relation to sending marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

6. The personal data we collect from you

Enquiries about being a host

When you request information or make enquiries about being a host, we will collect certain personal data about you in order to assess your suitability to become a host. We may collect such personal data during interviews we carry out with you or through inspections of your home.

The personal data about you we collect may consist of the following categories:

- Personal contact details such as name, title, address, telephone numbers, and personal email addresses.
- Gender.
- Date of birth.
- Occupation.
- Nationality.
- Address of the household at which the student or students would reside.
- Information about the household necessary to consider whether the accommodation is suitable for the hosting arrangement, including transport links and distance from the relevant school as well amenities which will be available for the student or students.
- Insurance details for the household as well as the gas safety certificate and further information obtained through carrying out a fire risk assessment of the household.
- Main language and main religion of the household.
- Your pets, interests, hobbies and eating habits.
- Photographs of the household taken and provided by you or taken by a member of

the Kaplan Accommodation Department.

We may also collect personal data from you relating to other individuals who will be living in the household during the period of the hosting arrangement. Such data about them may consist of:

- Name.
- Gender.
- Date of birth.
- Occupation.
- Relationship to you.

Finally we may also require the contact details of two referees in order to assess your suitability to become a host.

It is in our legitimate interests to collect and use the personal data listed above to consider and process your application to become a host.

Criminal convictions

We envisage that we will process information about criminal convictions if you wish to be a host for a student or students who are under 18 years.

We are required to carry out a criminal records check through the Disclosure and Barring Service or Disclosure Scotland in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable to be a host. We are also required to carry out similar checks on other adults who will be living in the household during the hosting arrangement.

These checks are necessary to fulfil our legal obligations in relation to safeguarding.

Hosting agreement

If we enter into a contract with you relating to a hosting arrangement, we may collect additional personal data relating to you including:

- Bank account details.
- Billing address.
- Other payment information in order for us to process payments to you.

This information, together with the personal data we have already collected as part of your application to become a host, will be used by us to perform the contract we have entered into with you relating to the hosting arrangement.

We may collect feedback from students at the end of their stay with you as a host which may include personal data.

Marketing

We may use your personal data to contact you from time to time with certain promotions or marketing communications relating to hosting or homestay arrangements.

If you would prefer that we do not send such communications to you, please use the unsubscribe function or contact us using the contact details in this Privacy Notice.

Internal business purposes

We also may use your personal data for our internal business purposes. This is in our legitimate interests in order to operate as a business and monitor and improve the services we provide. Where possible we will anonymise this information. Please contact us using the contact details in this Privacy Notice if you would like more information.

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 and other similar technologies. Please see our cookie policy on our website for further details.

If you fail to provide personal data

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. In this case, we may have to cancel the hosting arrangement you have with us but we will notify you if this is the case at the time.

7. When and how we share your personal data with others

We may share your personal data with third parties where required by law, where it is necessary to perform our contract with you or where we have a legitimate interest in doing so.

Such third parties may include the following:

- **Students, parents and guardians:** We may share your personal data with students you may potentially host as well as their parents or guardians.
- **Agents:** If the student uses an agent to arrange his or her study with us, we may share your personal data with them.
- **Our service providers:** We may share your personal data with other companies that perform certain services on our behalf. These services may include the provision of transport, processing payments, performing business and sales analysis and supporting our website and IT functionality. These service providers may be supplied

with or have access to your personal data solely for the purpose of providing these services to us or on our behalf. Kaplan is the data controller and will remain accountable for your personal data.

- **Regulators and Accreditation Bodies:** We may need to share your personal data if required by a regulator or to otherwise comply with law. This may include sharing personal data with the relevant local authority or the Local Safeguarding Children Board (LSCB) if there is a welfare concern. We may also need to share your personal data with Accreditation Bodies such as the British Council and Independent Schools Inspectorate.
- **Other entities in the Kaplan group:** We may share your personal data with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise or for system maintenance support and hosting of data.
- **Others:** We may share your personal information with other third parties such as in the context of the possible sale of our business. We may also need to share your personal data in order to permit us to pursue available remedies or limit damages we may sustain.

8. Transfer of your personal data to other countries

As we are an international business with employees, entities and service providers all over the world, we may need to transfer the personal data you provide to us to other countries which may be outside the European Economic Area (EEA).

The data protection laws in such countries may not be as comprehensive and provide the same level of protection for your personal data as those within the EEA. In these circumstances, we will take appropriate steps to ensure that your personal data is handled as described in this Privacy Notice. These steps will include appropriate contractual mechanisms. Please contact us using the contact details in this Privacy Notice if you would like more information.

9. The security of your personal data

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 information to those employees, service providers, business partners, agents and other third parties who have a legitimate need to know. They will only process your personal information on our instructions or as otherwise agreed and they are subject to a duty of confidentiality.

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

10. Our storage and retention of 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. Please contact us using the contact details in this Privacy Notice if you would like more information.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

11. Your rights as a data subject

Under certain circumstances, by law 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 that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **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 exercised your right to object to processing (see below).
- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using the contact details in this Privacy Notice.

No fee usually required

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Your right to withdraw consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the contact details in this Privacy Notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12. Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.