

Privacy policy

Spring Education Society ("we", "us" or "our") take data security and compliance with data protection seriously. This policy explains how we collect, store, use and disclose any personal data during our operations. Within the context of this policy "you/your" means parents/guardians and children attending our activities, weekend classes/school and using/benefiting from our services and activities. Your privacy matters to us so please take the time to get to know our practices and contact us if you have any questions.

We are the so-called "data controller" of your personal data (for the purpose of the General Data Protection Regulation ("GDPR")) and we are responsible for the lawfulness of how we handle your personal data.

1. Collection of personal data

We collect and process some or all of the following types of information provided by you:

- Information that you provide when register for our education/tuition services and other activities. We process personal details such as name, date of birth, phone numbers email address, address, medical condition information ethnicity, test scores;
- Information you provide when you use our services or when you/your children attend our classes and other activities;
- Only data that is relevant for the provision of services is collected and processed.

We may also process so called special categories of personal data about you or your children, which can be considered sensitive, if you have chosen to provide us with such or if you have made such information publically available.

2. Purpose and lawfulness of processing

We rely on legitimate interest as the lawful basis for the processing set forth in this Privacy Policy. Our legitimate interest is the provision of services/classes/tuition/activities to children and their parents/guardians.

You may object to our processing of your personal data by managing your privacy settings by contacting us directly (refer to section "Contact").

We use information about you in the following ways:

- To consider your children's progress;
- To communicate with you about planned/delayed/cancelled classes and activities; and
- To enhance any information that we receive from you with information obtained from other sources.

Personal data that is processed with the purpose of aggregated analysis is always made unidentifiable. Such personal data cannot be used to identify you.

3. Sharing your personal data

We will only share your personal data where necessary for the purposes listed in this privacy policy. This may be to other Spring education tuition centers, government authorities and our trusted suppliers (data processors).

The data that we collect from you and process may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

Our sharing of personal data outside the EU/EEA requires certain legal ground under applicable data protection legislation. Where a country is regarded by the European Commission to be a country with adequate level of protection for personal data, this will be our legal ground. Otherwise there are three main types of legal ground on which that we may base such sharing. These are:

1. that the transfer is necessary for our performance of the contract with you;
2. that the transfer will be based on the standard data protection clauses for transfer of personal data to countries outside of the EU/EEA adopted by the European Commission; and
3. the EU-U.S. Privacy Shield, where the transfer is made to the United States and the recipient is duly certified.

4. How long your personal data will be processed

We will retain the personal data we collect for a maximum of **48** months.

Your personal data will be deleted on one of the following occurrences:

- after 48 months;
- upon your termination of using our services; or
- after our receipt of a written request from you in accordance with the below ("Your rights").

5. Your rights

According to the applicable data protection legislation, you have certain rights as a so-called "data subject". Your rights include the following:

1. **Right to access** – You are entitled to access the personal data that we handle. You are also entitled to receive certain information about what we do with the personal data. Such information is provided in this document.
2. **Right to rectification** – Under certain circumstances, you are entitled to correct inaccurate personal data concerning you and to have incomplete personal data completed.
3. **Right to erasure** – Under certain circumstances, you are entitled to have your personal data erased. This is the so-called "right to be forgotten".
4. **Right to restriction of processing** – Under certain circumstances, you are entitled to restrict how we use your personal data.
5. **Right to data portability** – You are entitled to receive your personal data (or have your personal data directly transmitted to another data controller) in a structured, commonly used and machine-readable format from us.
6. **Right to object** – You are entitled to object to certain types of handling of personal data that we carry out. This applies to all our activities that are based on our "legitimate interest".

Finally, you also have the right to lodge a complaint with the applicable data protection supervisory authority.

6. Security

We take appropriate measures to ensure that all your personal data is processed with security in mind, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to view it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

7. Changes

We will inform you if we make any changes or additions to this Privacy Policy.

8. Contact

For questions or further information about our handling of personal data, or for contact with us in other privacy matters, please use the following email address: info@springeducation.org.uk