



VICI Language Academy Data Privacy Policy

The VICI Language Academy LLP (the 'Academy') is registered in England and Wales under registration number OC359195. Our registered office is Arcade House, Bartholomew Street, Newbury RG14 5AD UK. The VICI Language Academy LLP has notified the Information Commissioner's Office and is registered on the United Kingdom's Data Protection Register under registration ZA022563

This document sets out the privacy policy of the Academy and explains how we use your personal data, meaning any information about you which is personally identifiable - such as your name, address, telephone number or email.

Topics

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- How will we use the information about you?
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1. What information do we collect about you?

We collect information about you when you register interest in a language programme, workshop or event to determine the correct package for you. We also collect information when you complete your membership agreement and student release forms on entering a membership agreement with the VICI Language Academy (See Appendix 1 and Appendix 2 for the data collected). If you contact us in writing, by email or other electronic means, we may keep a record of that correspondence.

2. How will we use the information about you?

We collect information from you to

- administer courses
- ensure safety around class sizes
- ensure legal compliance around teaching children and young adults
- be prepared for emergency purposes in the event there is an incident involving the Academy or someone within it
- enable your coach to contact you to set up, change or cancel programmes

- Keep you informed about language workshops, events and other programmes which may enhance your existing programme or be of interest to you as a new programme

Your personal detail is used by the Academy only and is never sold or given without contract to third parties. The Academy will not share your information for marketing purposes with anyone except VICI Partners or contracted coaching staff. Please see below a list of suppliers with associate GDPR statements who provide administrative support to the Academy

- Our Client Relationship Management data base GDPR compliance notice can be found here <https://www.infusionsoft.com/legal/data-protection-faq>
- If you are on a monthly membership you will have supplied your details to the Debit Finance Company who administer the VICI Language Academy Direct Debit scheme – their GDPR compliance notice can be found here <https://www.debitfinance.co.uk/terms-and-conditions>
- If at any point you have paid via credit card – and provided your detail to WorldPay our credit card provider their GDPR compliance notice can be found here <https://www.worldpay.com/sites/default/files/171120-SME-Terms-2017.pdf>
- If you have completed our membership documents on line with our provider DocuSign please see their GDPR notice here <https://www.docuSign.com/gdpr-basics>.
- For those of you using our i.vici platform the data stored here is held by aws who are GDPR compliant and whose information can be found here <https://aws.amazon.com/compliance/eu-data-protection/>

Below is a list of the ways in which your personal information is used. We have outlined our reason for holding and processing your data as required under Data Protection Law.

Data Collected	Reason for collection	Use of data
Name, Address, telephone number, email contact	Legitimate Interest	To set up membership with the Academy, to provide a means of emergency contact in the event one is needed during the clients programme, for those clients who have consented to monthly billing contact details are required to set up a Direct Debit on your behalf
Name of children who are on a programme	Legitimate Interest	Required for a register to ensure that class sizes do not exceed the maximum set by law
Date of Birth for children	Legitimate Interest	In order to ensure that children's classes have the correct staff to child ratio as required by law
Date of Birth for Adults	Consent	Only day and month is collected and voluntarily provided by clients - data is used to acknowledge birthdays
Email Correspondence	Legitimate Interest	Only relevant emails are stored. Emails confirming consent or acknowledgement of an agreement are stored. Emails relating to conflicts or resolutions for reference purposes are also retained
Information regarding consent to use images	Legitimate Interest	The Academy stores this information to ensure it adheres to the clients consent to use images
Allergies	Legitimate Interest	Food allergies are recorded to ensure any events at the Academy where food is distributed acknowledges the client's needs
Permission to leave the premises	Legitimate Interest	Relevant only to children between

		the ages of 11-16 - for safety purposes the Academy must have a record of parent consent to allow children to leave the Academy unaccompanied
Programme Information	Legitimate Interest	Data collected to administer previous, new, existing and future language programmes to ensure that the clients progress is acknowledged and the correct course is in place
Email	Consent	To keep clients informed of programmes, workshops, events at the Academy in addition to any changes which may impact their individual programmes

* Legitimate Interest- required by the Academy to administer client membership at the Academy

** Consent - once a client has consented to the Academy holding this information they may opt out at any time

3. Access to your information

You have the right to request a copy of the information that we hold about you. If you would like a copy of your personal data or a fuller report including stored email correspondence please email admin@thevici.com or write to us at VICI Language Academy, Arcade House, Bartholomew Street RG14 5AD.

We want to make sure that your personal information is accurate and up to date so on occasions we may request you to provide the most recent data. You may ask us to correct or remove information you think is inaccurate.

4. Data Storage and Retention

In some instances, the storage of your data may be held with companies overseas outside of the European Economic Area ('EEA') which do not have well developed Data Protection Legislation when compared to the relevant laws with the EEA. Accordingly, you agree that your personal data in electronic format and or physical form may be stored transferred or accessed across national borders and entities as needed. However, we will endeavour to maintain the same levels of security in protecting your personal data as if it was being stored in the UK. We also ensure that our administration suppliers who are not UK based companies have GDPR awareness and policies as noted in section 2 above.

Personal Data is retained for ex-clients for the purpose of taking into account previous programmes should you wish to rejoin the Academy, to ensure your new programme takes into account your earlier learning, to make you aware of ad hoc workshops that be of interest to you and for conflict resolution purposes. Unless an outstanding conflict resolution is still in progress personal information will be deleted after a maximum period of 6 years but may be deleted earlier. As with existing clients, ex-clients retain the right to request a copy of their personal data or a fuller report including stored email correspondence by emailing admin@thevici.com or writing to us at VICI Language Academy, Arcade House, Bartholomew Street RG14 5AD.

5. Marketing

We would like to send you information about our programmes, workshops, events and activities at the Academy. If you have consented to receive marketing information you may opt out at a later date

You have a right to stop us from contacting you for marketing purposes at any time.

If you no longer wish to be contacted for marketing purposes, please admin@thevici.com

6. Internet

If you provide us with personal data over the Internet, you should be aware that data transmission via this medium cannot be guaranteed to be 100% secure. While we will take all reasonable efforts to protect such personal data you acknowledge that we cannot ensure or warrant the security of any personal data provide by these means and you provide to us at your own risk. Once received we have procedures to cover the storage and disclosure of your personal data to prevent unauthorised access and comply with the UK Data Protection Act 1998. If despite our security precautions, personal data is inadvertently disclosed we shall use all reasonable endeavour to limit and remedy the disclosure and to the extent permitted by law we accept no liability to unintentional disclosure of personal data.

7. Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to complete statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from our browser. However, in a few cases some of our website features may not function as a result.

8. Other websites

Our privacy policy relates to all VICI Language Academy domains. While we have ensured GDPR compliance with suppliers you should on visiting their websites read their own privacy policies (see list in section 2)

9. Changes to our privacy policy

We keep our privacy policy under regular review and we place any updates on this web page. This policy was last updated on 17 May 2018.

10. How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you

By email – admin@thevici.com

Or write to us at The VICI Language Academy LLP, Privacy Team, Arcade House, Bartholomew Street, Newbury RG14 5AD UK

APPENDIX 1



THE VICI LANGUAGE ACADEMY MEMBERSHIP AGREEMENT

This membership agreement is made between the Academy named above and the member who is as detailed below. Membership terms and conditions are set out overleaf.

Title:

First name (s):

Surname:

Address:

Post Code:

Mobile:

Home Tel:

Email:

Date of Birth (day and month):

How did you find us?

MEMBERSHIP DETAILS:

Language Package:

Membership term:

Membership start date:

Renewal date:

Joining Fee:

Programme amount paid in full:

1. This document will act as a receipt of payment once this has been made.
2. Upon signing this document the member accepts the services provided by the Company and the conditions set out overleaf.

SIGNED BY THE MEMBER:

SIGNED FOR & ON BEHALF OF THE COMPANY:

DATE:

DATE:

Appendix 2



Student Release Form



I, the undersigned, do hereby grant/deny permission to The VICI Language Academy LLP to use the image of me,

as marked by my selection(s) below. Such use includes the display, distribution, publication, transmission, or other use of photographs, images, and/or video taken of me for use in materials that include, but may not be limited to, printed materials such as brochures and newsletters, videos, and digital images such as those on the VICI Language Academy Web site.

Deny permission to use my image at all.

Grant permission to use my image in the following ways (mark all that apply):

Limited usage: I wish my image to be used within The VICI Language Academy setting only (not in the larger community).

Limited usage: I wish my image to be used for educational materials only (not marketing). This could be either within The VICI Language Academy or in the larger community. One example of this could be videos in parent education classes.

Limited usage: I wish my image to be used on printed materials only (no digital or video usage).

Unrestricted usage: I give unrestricted permission for my image to be used in print, video, and digital media. I agree that these images may be used by The VICI Language Academy for a variety of purposes and that these images may be used without further notification. I do understand that my surname will not be used in conjunction with any video or digital images without prior consent.

From time to time the teacher may introduce food into the classes to demonstrate a French breakfast, for example. Please state on the reply slip below whether you suffer from any food or drink allergies, eg. nuts, milk, etc... giving full details.

Please indicate as appropriate:-

EITHER

I have an allergy to the food(s)/drink(s) as stated below and must not be given this under any circumstances:

Details:

OR

I do not have any food allergies.

Signature:

Date:

If you have questions, please contact Mme Danon-Kerr on 07976 243529