



LEADING EDUCATION

DATED: DECEMBER 2022

LEADING EDUCATION
PRIVACY POLICY FOR STUDENTS, PARENTS, AND PARTNERS



About This Policy

Leading Education Applications Ltd has written this Privacy Notice to explain how we keep your data safe and respect your privacy. Below you will find information explaining how we do this: what data we process about you; why we process that data and the legal bases for processing that data. If you have any questions please contact us: Data Compliance Manager Leading Applications Ltd, Edinburgh House, 170 Kennington Ln, London SE11 5DP / matt@leadingeducation.co.uk

Your Rights

Under certain circumstances, you may have certain rights regarding how your personal data is used and kept safe, including the following:

- Right of Access: You have the right to a copy of the information we hold about you.
- Right to Object: You may object to the use of personal data if it would cause, or is causing, damage or distress. You have the right to object to any decisions taken using automated processes. You also you have the right to object to certain types of processing such as direct marketing.
- Right to be Forgotten: Under certain circumstances, you can ask for the data we hold about you to be deleted from our systems.
- Right to Rectification: If data we hold about you is inaccurate or incomplete, you have the right to correct or complete that data.
- Right to Restriction of Processing: Where certain conditions apply you have a right to restrict the processing of data.
- Right of Portability: You have the right to have the data we hold about you transferred to another organisation. Some of these rights may not apply where we are legally obliged to keep or share your personal data. If you wish to exercise any of these rights, please contact our Data Compliance Manager.

Privacy Policy for Students, Parents, and Guardians

This privacy notice explains how we collect, store and use personal data about students. Leading Education Applications Ltd is the data controller, and for the purposes of data protection law, this privacy notice applies to Leading Education Applications Ltd and all subsequent brands.

1. What data do we collect and why?

The table below shows the data that we process about students, the reasons for processing this data and the lawful bases for processing this data. Cells marked with an asterisk (*) indicate that parent or guardian data may also be processed in the same way, where a student requires parental consent.



The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Your name, date of birth, gender, addresses, email addresses and phone numbers. Your relationship to the student*	To identify you to communicate with you for marketing purposes	Fulfilment of a contract with you where you have given us consent Necessary for our legitimate interest (to promote our educational activities)
Your nationality, ethnic background, any special educational needs, special requirements or disabilities	To provide appropriate information and assistance for you	Fulfilment of a contract with you Compliance with a legal obligation where you have given us consent
Next of kin and emergency contact numbers	To contact your family or close friends in the event of an emergency	To protect your vital interests
Bank account details*	To manage payments and refunds	Fulfilment of a contract with you
Your educational records and test or exam results	To offer you the most appropriate courses	Fulfilment of a contract with you
Your medical information, including medications you take, allergies and dietary requirements	To help you manage your health while you are with us	Fulfilment of a contract with you Compliance with a legal obligation where you have given us consent
Your educational records and reports from Leading Education	To manage your progress while studying with us	Fulfilment of a contract with you
Your attendance records	To track lesson delivery	Fulfilment of a contract with you
Details of your welfare such as how you are getting on at Leading Education Ltd, safeguarding or child protection records and any problems or issues you may have had	To look after your wellbeing and meet government safeguarding regulations	Fulfilment of a contract with you Compliance with a legal obligation
Images and lesson recordings	For maintaining security For marketing our services For quality control purposes	Necessary for our legitimate interest (for keeping our staff and students safe) Where you have given us consent Necessary for our legitimate interest (to promote our educational activities and show prospective students/parents what we do)

Where we have obtained consent to use student data, this consent may be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.



2. When do we share student, parent, or guardian data?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation name	The reason for sharing
Leading Education Tutors	To arrange tuition and deliver services
Financial organisations*	For processing payments
Our auditors	For carrying out legal audits of company accounts
Health and social welfare organisations	To manage student wellbeing
Professional advisers and consultants	To assist us in developing our business
Your family and representatives	To share details of your academic progress or to tell them about attendance or behaviour issues or for debt collection

3. Storing student, parent, and guardian data

We will keep personal information about you while you are an active student. We create and maintain records for each individual student. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as a student with Leading Education Applications Ltd. If you submit your data but do not book any programmes, your data will be stored for two school years. If you book a programme with Leading Education, your details will be stored for up to 4 years.

Privacy Policy for Agents & Partners

This privacy notice explains how we collect, store and use personal data about agents and school partners. Leading Education Applications Ltd is the data controller, and for the purposes of data protection law, this privacy notice applies to all subsequent brands.

1. What data do we collect and why?

The table below shows the data that we process about agents and agencies, the reasons for processing this data and the lawful bases for processing this data.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Names, address, email addresses, phone numbers	To communicate with you about students you have sent to Leading Education Applications Ltd; to ensure you have up-to-date information so you can provide accurate information to potential students	Fulfilment of a contract with you



Joining information, references	To register your agency with Leading Education Applications Ltd	Necessary for our legitimate shared interests
Details of students you have sent to us	To administer our business, to manage agreed recruitment targets	Fulfilment of a contract with you
Images	For marketing our services	Where you have given us consent
Financial details, bank account information, commission agreements, payment records	To administer our business, to make commission payments	Fulfilment of a contract with you

Where we have obtained consent to use partner data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

2. When do we share student, parent, or guardian data?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation name	The reason for sharing
Leading Education Tutors	To arrange tuition and deliver services
Service providers	For running surveys
Financial organisations*	For processing payments
Our auditors	For carrying out legal audits of company accounts
Health and social welfare organisations	To manage student wellbeing
Professional advisers and consultants	To assist us in developing our business
Police forces, courts, tribunals	For dealing with legal issues

3. Storing Partner Data

We will keep personal information about you while you are an active agent. We create and maintain records for each agent. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as an agent or school partner for Leading Education Applications Ltd. Once your time as an agent with us has ended, we will retain this file and delete the information in it in accordance with our Data Retention Policy. Partners who have not booked or communicated with Leading Education will be considered as inactive four years after your last interaction.



Privacy Notice for Website Users

This privacy notice explains how we collect, store and use personal data about users of our website. Leading Education Applications Ltd is the data controller.

1. What data do we collect and why?

The table below shows the data that we process about agents and agencies, the reasons for processing this data and the lawful bases for processing this data.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Information about your computer and about your visits to and use of this website such as your IP address, geographical location, device, internet browser and operating system, how you got to the site, time, day and length of the visit and which pages you click on.	To administer the website, improve your browsing experience, enable you use of the services available on the website Provide third parties with statistical information about our users- but this information will not be used to identify any individual user Deal with enquiries or complaints made by or about you relating to the website.	Legitimate interest Consent (where you have consented to the use of non-essential cookies).
Information that you provide us with for the purposes of registering with us to find out more information about our courses for example	To provide appropriate information and assistance for you. Send you communications relating to the Admissions process which we think may be of interest to you by email or similar technology. You can inform us at any time if you no longer require these communications by emailing us. Deal with enquiries or complaints made by or about you relating to the website.	Fulfilment of a contract with you Legitimate interest Consent
Information that you provide us with for the purpose of subscribing to our website services and email notifications	To send you email notifications you have specifically requested. Send you communications relating to the Admissions process which we think may be of interest to you by email or similar technology. You can inform us at any time if you no longer require these communications by emailing us. Deal with enquiries or complaints made by or about you relating to the website.	Consent Legitimate interest

2. When do we share website user data?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.



Organisation name	The reason for sharing
With Third Party Companies and Individuals, service providers who facilitate our website, host the website on our behalf and who assist us in analysing how our website is used.	To improve our website and the services provided for you
Professional advisers and consultants	To assist us in developing our business
Police forces, courts, tribunals	For dealing with legal issues
Marketing services, such as those offered by Facebook	To identify other students who may be interested in studying with Leading Education. No decisions will be taken about you based on this profiling

Changes to our Privacy Policy

We may update our Privacy Policy from time to time and we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page which will become effective immediately.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please email our Data Compliance Manager (matt@leadingeducation.co.uk). Alternatively, you can make a complaint to the Information Commissioner's Office in the UK via the options listed below, although we would be grateful for the opportunity to address your concerns before you contact the ICO. How to contact the ICO:

Report a concern online at <https://ico.org.uk/make-a-complaint/>

Call +44 303 123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, UK

Contact Us

If you have any questions, concerns or would like more information about anything mentioned in our privacy notices, please contact our Data Compliance Manager matt@leadingeducation.co.uk (Last Updated: 19 December 2022)