



**Global Education Holdings Limited  
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# **GEDU Privacy Policy**

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<b>Related policies</b>
<ul style="list-style-type: none"> <li>▪ GEDU Data Protection Policy</li> <li>▪ GEDU DSAR Policy</li> <li>▪ GEDU Information Security Policy</li> </ul>
<b>External Reference</b>
<ol style="list-style-type: none"> <li>1. Information Commissioner’s Office Accessed online at: <a href="https://ico.org.uk/">https://ico.org.uk/</a></li> <li>2. UK Public General Acts, Data Protection Act 2018 Accessed online at: <a href="https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted">https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted</a></li> <li>3. UK General Data Protection Regulation Accessed online at: <a href="https://www.legislation.gov.uk/eur/2016/679/contents">https://www.legislation.gov.uk/eur/2016/679/contents</a></li> </ol>

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## GEDU Privacy Policy

### 1. Introduction

1.1 Global Education Holdings Limited (referred to as “GEDU” ‘we’, ‘us’ or ‘our’) gathers and processes your personal information in accordance with this privacy notice and in compliance with the UK General Data Protection Regulation (UK GDPR) and related UK data protection legislation. GEDU is the data controller and we are responsible for your personal data.

1.2 This notice provides you with information regarding your rights and our obligations, and explains how, why, and when we process your personal data.

1.3 We have appointed a Data Protection Officer who oversees privacy related matters for us who can be contacted at [info@gedu.global](mailto:info@gedu.global).

### 2. Information that we collect

2.1 GEDU processes personal information to meet our legal, regulatory, statutory, and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

2.2 GEDU collects information from the following:

1. visitors to our website [<https://gedu.global/>]
2. enquiries and survey respondents
3. people who:
  - a. email GEDU or fill in our forms
  - b. call GEDU
  - c. contact GEDU via social media
  - d. respond to a GEDU Survey
4. visitors to our office
5. current and former student
6. details when students apply for a course at GEDU
7. when students enrol at GEDU and progress through the course
8. data received from external sources such as UCAS and external referees
9. our colleagues
10. our staff, board members, contractors, volunteers and people who apply to work with us

2.3 You don't have to create an account or provide us with any personal information when you access the GEDU website. We may ask for some personal details if you access some of our services for example to:

- order a prospectus
- register for an event such as an open day
- make an enquiry

2.4 If you use one of our website forms or if you contact us by email, we may collect and process personal information about you. This may include:

- Your contact details including your address and phone number
- Your email addresses
- Your name, title, date of birth and gender
- Education or professional details
- Attendance at GEDU events

2.5 We may automatically collect certain data from you as you use our website by using cookies and similar technologies.

2.6 We may receive data from third party analytics providers which may include Google, advertising networks such as Facebook, providers of technical, payment and delivery services, such as data brokers or aggregators based outside the UK.

2.7 Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

2.8 We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at [info@gedu.global](mailto:info@gedu.global). In case we need to use your details for an unrelated new purpose, we will let you know and explain the legal grounds for processing.

### **3. How we use your personal data**

3.1 GEDU takes privacy seriously and we will never disclose, share, or sell your data without your knowledge.

3.2 We may process your personal data without your knowledge or consent where this is required or permitted by law.

3.3 We only retain your data for as long as it is necessary.

3.4 We will only use your data for the purposes for which we have collected for, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

3.5 Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

3.6 During its activities, GEDU will use student data to carry out its functions and to provide services to student as part of the student journey. Due to the vast amount of activities GEDU undertakes, it is not possible to state every instance where student data will be used, however GEDU is committed to ensure student data is only used in carrying out GEDU's business.

#### **4. Disclosures of your personal data**

4.1 We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services, marketing, and delivery services.
- Our Group subsidiaries that are controlled or affiliated with GEDU
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities
- Third parties to whom we sell, transfer, or merge parts of our business or our assets

4.2 We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.

4.3 Where your data is shared with third parties, we will seek to share the minimum amount necessary.

4.4 Where necessary, student personal information will be shared internally within and across other departments at GEDU. Personal information is protected by GEDU and may be shared with external parties, as required during studies.

#### **5. Data Security**

5.1 We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

5.2 We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

#### **6. Data Retention**

6.1 We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as the law otherwise permits.

#### **7. Your rights to the information we hold about you**

7.1 Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

7.2 You have the right to see the personal data that we keep about you, by making a request in writing to us at [info@gedu.global](mailto:info@gedu.global). However, we may charge a reasonable fee if your request is manifestly unfounded, repetitive, or excessive or refuse to comply with your request in these circumstances.

7.3 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made many requests. In this case, we will notify you.

7.4 If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## **8. Student Responsibilities**

8.1 Throughout the course of your studies, you have a responsibility to keep your personal details up to date. You can update your details by sending the email to [info@gedu.global](mailto:info@gedu.global). During your time as a student, you may have access to other individuals' personal data and you are legally obliged to handle this in a confidential, professional and responsible manner in line with data protection legislation and any other codes of conduct or ethics.

8.2 If you are made aware of an individual's personal information, then you are expected to keep this confidential and to not tell anyone without the individual's prior consent (unless there is an exceptional circumstance). You should also not seek to actively obtain another individual's personal information to which you are not entitled. In the instance where data protection legislation or a duty of confidence has been breached, disciplinary action will be considered.

## **9. Use of technology platform**

9.1 The website uses Google Analytics technology which may collect non-personally identifiable information relating to your use of the site. This may include which pages you see; how long you stay; what you click on our pages; if you visit the website again; which country and city you are browsing from etc. This data is collected for monitoring and understanding the effectiveness of our websites.

9.2 We also collect data relating to the demographics and interests of our users via Google Analytics and cookies set by Google advertising networks. This data is used in aggregated form to help improve the site and our marketing efforts. For further information on Google safeguards for personal data see: <https://policies.google.com/privacy>

## **10. Cookies**

10.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about how to reject cookies using your internet browser settings, please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **11. Third-Party Links**

11.1 This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 12. Consent

12.1 By using our site, you consent to our websites privacy policy.

## 13. How to complain

13.1 GEDU only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority. In the first instance, complaints should be directed to GEDU Data Protection Office at [info@gedu.global](mailto:info@gedu.global).

13.2 If you remain concerned that your information has not been handled as described, you may raise your complaint with the Information Commissioner's Office (ICO).

## 14. Contacting us

14.1 If there are any questions regarding this privacy policy please contact the Data Protection Officer by email at [info@gedu.global](mailto:info@gedu.global) or by post to Global Education Holdings Limited, 891 Greenford Road, Greenford, London, UB6 0HE.

## 15. Monitoring and Review

15.1 This policy may be amended by GEDU at any time.

## 16. Alternative Format

16.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Welfare Officer/Manager