



37 Crawford Street  
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## ABOUT

When UES is contracted by a School to provide services to its students, UES acts as a Data Processor for that School, because the school may pass us Personal Data relating to its students and their families. This means that UES has certain legal obligations under **GDPR (General Data Protection Regulation)**.

## AGREEMENT

- UES must only act on the written instructions of the School (unless required by law to act without such instructions);
- UES must ensure that people processing the data, namely tutors and administrators, are subject to a duty of confidence;
- UES must take appropriate measures to ensure the security of processing;
- UES must only engage sub-processors additional to those listed below with the prior written consent of the School;
- UES must assist the School in providing subject access and allowing data subjects to exercise their rights under the GDPR;
- UES must assist the School in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- UES must delete or return all Personal Data to the School as requested at the end of the contract; and
- UES must submit to audits and inspections, provide the controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the School immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.



## TO WHAT PERSONAL DATA DOES THIS AGREEMENT PERTAIN?

This Agreement relates to all Personal Data (of students and parents) that the School submits to us to enable us to fulfil our contractual obligations to the School, and any Personal Data that we collect from the students/parents specifically for the purposes of our contractual obligations to the School.

It does not relate to Personal Data we may collect (with explicit consent) from students and parents via other means, such as their contacting us directly or submitting their details to us at events such as fairs and presentations.

## PRINCIPLES OF GDPR

Under the GDPR regulations of 2018, the six key principles relating to the use of Personal Data are that collection and use should be **Fair and Lawful**, that it should only be used for the **Purposes** described when it was collected, that only the Personal Data **Adequate** for the reasons stated is collected, that Personal Data is **Accurate** and can easily be corrected by its owner, that Personal Data is only **Retained** for as long as necessary, and that the **Rights** of individuals regarding Personal Data are upheld. UES is committed to these principles.

**As required by the GDPR 2018, UES London Ltd is registered with the Information Commissioner's Office because our main operations take place in the UK.**

## LAWFUL BASIS

Before using Personal Data, for example emailing students, we determine the Lawful Basis for doing so. This is normally by Legitimate Interest, because the School believes those students to be interested in our services.

## WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

The principle purposes for which we collect and store Personal Data are to fulfil our contractual obligation to the School and the students, to respond to enquiries, to allow us and our tutors to contact students regarding requested services, and to inform students of services that are related to their needs that we have determined are of Legitimate Interest.

Personal Data may include name, address, telephone numbers, and email addresses. We may also collect emergency contact details of



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an additional person. We will also store details of sessions, workshops, lessons, courses or tests that students have had, for our administrative and monitoring obligations. **This information will only be used to deliver our services, and only relevant information will be passed on to our tutors.**

**We may collect financial information such as bank details from parents or students (if over 18).** If anyone pays by debit or credit card, cardholder information is collected via Stripe and is **never stored by us and we never see this information.**

## SENSITIVE PERSONAL INFORMATION

We will never require Sensitive Personal Data (information that includes details of disabilities, religion, or ethnic origin), but if the School or a student tells us that this information is necessary for the provision of our services, we may store it for the purposes of improving our services to the School and its students. **This information will only be used to deliver our services, and only relevant information will be passed on to tutor(s).**

## CHILDREN'S PRIVACY

The details of children we teach are never passed on to any third party, except to their tutor(s), without the express permission of their parent or guardian.

We will never send marketing information to children under the age of 13, and never without explicit consent.

## INDIVIDUAL RIGHTS

UES is committed to providing reasonable and practical access to Personal Data to allow individuals the opportunity to identify inaccuracies or request deletion. Since the School is a Data Controller, if individuals would like to access, delete and/or correct any of their Personal Data held by the School or us, we will work with the School to maintain these rights. Additionally, students and parents may contact us by telephone, email or letter and we will respond to their request within 15 days. We may ask them to prove their identity before complying with requests. We will not normally charge a fee for such requests.



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## **Right to be Informed**

UES aims to make its activities related to Personal Data transparent. Individuals have the right to request information about how we store and process Personal Data, our purposes for doing so, and our data retention periods.

## **Right of Access**

Individuals have the right to access Personal Data that we hold about them. If they request this, we will provide them with all the Personal Data we hold about them (or children in their care).

## **Right to Rectification**

Individuals have the right to request that we make changes to their Personal Data, and that any Personal Data we store or process is accurate.

## **Right to Erasure (aka Right to be Forgotten)**

Individuals have the right to have all their Personal Data that we store about them deleted, except in cases where we are legally required to store such information.

## **Right to Restrict Processing**

In certain circumstances individuals may ask us not to use their Personal Data but to continue to store it. This may be for legal reasons, or where they suspect that Personal Data is inaccurate, for example.

## **Right to Data Portability**

If an individual requests a copy of their Personal Data, we have the duty to provide it in a way that enables them to take that information to other providers in an easy way, ie in a machine-readable format.

## **Right to Object**

Individuals have the right to object our use of their Personal Data, and we will stop doing so unless we have a legitimate and lawful reason not to do so.

## **Rights related to Automatic Decision Making**

UES does not carry out automatic decision making using Personal Data, such as profiling.

## **WHERE WE STORE PERSONAL DATA**

UES stores Personal Data on a secure online system, which is accessed only by our staff trained in the correct use of Personal Data in accordance with this Agreement, our Privacy Policy and our internal Data Protection Procedure. We never store any Personal Data in physically written form. In order to fulfil our services to the School, we pass on some essential details to the tutor(s). Tutors are



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similarly trained in the understanding of our Privacy Policy and this Agreement, and **will never pass details on to any party outside of the organisation.**

## SUB-PROCESSORS

We may use the following companies to process Personal Data of students at the School in relation to this Agreement:

- Email provided by RackSpace
- Google Sheets (for managing classes)
- Typeform (for collecting details)
- Debit Direct (for Direct Debit payments)
- Stripe (for card payments)
- QuickFile (for processing account information)

Where we use Sub-Processors, we ensure that these organisations are **fully GDPR compliant**. This means they cannot use Personal Data in any way other than that proscribed by us.

## HOW LONG WE RETAIN INFORMATION

We will retain Personal Data for the duration of our Agreement with the School, unless earlier requested to delete Personal Data,

Where we have collected Personal Data with explicit consent in order to tell individuals about our services, for example at school fairs or presentations, we will continue to store and use this Data until the owners request us not to do so.

## SECURITY MEASURES

UES has established safeguards, policies and procedures, such as password protection and encryption, to help prevent unauthorised access to or misuse of Personal Data. Only staff trained according to this Agreement, our Privacy Policy and our internal Data Protection Procedures have access to Personal Data. If an individual contacts us, we will ask them to verify certain information related to them before providing any access to Personal Data.

## THIRD PARTIES

UES will not share Personal Data with third parties, apart from with tutors in order to fulfil our services to the School. **We do not pass on**



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**details to any other third parties**, unless it is necessary for the immediate safety of the student (for example emergency services) or for other obligatory legal reasons.

## **DATA PROTECTION OFFICER**

UES has a designated Data Protection Officer (DPO) whose responsibility it is to oversee the adherence of UES to the GDPR.