

## **PRIVACY NOTICE**

This is International Teacher Solutions Limited (“ITS”)’s Privacy Notice.

ITS respects your privacy and is committed to protecting your personal data.

ITS is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This Privacy Notice explains how we look after visitor information collected from this site, the practices we follow to protect the privacy of all visitors, and your privacy rights.

This website is not intended for children and we do not knowingly collect data relating to children.

This Privacy Notice is in two parts.

*Section 1* – To comply with GDPR, we are required to update the data protection references in our contracts with customers and provide certain details regarding ITS and collection and use of any personal data.

*Section 2* – The second part of this Privacy Notice, is in relation to information we collect from the site and the practices we follow to respect the privacy of all visitors.

### **SECTION 1**

ITS is a separate and independent legal entity.

The registered office of ITS is Kemp House, 160 City Road, London, London, United Kingdom, EC1V 2NX. If you have any problems please contact [enquiries@int-teachers.com](mailto:enquiries@int-teachers.com).

### **What are your rights**

If you believe the information we process on you is incorrect you should contact us to have it corrected or deleted and may also request to see the information which is being held by ITS. If you wish to raise a complaint on how the business has handled your personal data, please contact [enquiries@int-teachers.com](mailto:enquiries@int-teachers.com) or 0203 2897657 to enable us to investigate the matter.

If you have followed our complaints procedure, but are not satisfied with our response, or if you believe that we are not processing your personal data in accordance with the relevant law, you may complain to the Information Commissioner’s Office (“ICO”).

ITS will only collect basic personal data about you (unless otherwise agreed) which does not include any “sensitive personal data”. Basic personal data does, however, include data such as your name, work address, email address and job title.

The following is a full list of your rights under GDPR:

1. The right to access the personal data we hold on you.

2. The right to correct and update the personal data we hold on you.
3. The right to have your personal data erased.
4. The right to object to processing of your personal data.
5. The right to data portability.
6. The right to withdraw your consent to the processing at any time for any processing of personal data to which consent was sought.
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the ICO. For more information on the Information Commissioner, and how to make a complaint, please visit their website at [www.ico.org.uk](http://www.ico.org.uk).

### Data Collection

ITS need to know basic personal data in order to provide you with our services, and to claim our right to be paid in return for providing our services, under our standard terms of contract. If you do not provide this information then we will be unable to provide the services you have requested.

We will not collect any personal data from you that we do not need in order to provide and oversee the services we have agreed to provide you with.

This includes personal data you provide when you:

- apply for our products or services;
- make a general enquiry on our website; or
- subscribe to our service or publications or request marketing to be sent to you.

Please refer to our [Candidate Privacy Policy](#) for full details of how we hold and process personal information in relation to our candidates.

### Use of Data

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into – including, but not limited to, the following circumstances:
  - You may receive candidate CV alerts;
  - To match a client's details with a potential applicant;
  - To retain your details for the purposes of notifying you of candidates which may be suitable for you;
  - To answer any queries you may have; and/or
  - To fulfil contracts with our clients.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

All the personal data we hold about you will be processed by our staff and no third parties will have access to your personal data unless there is a legal or contractual obligation for us to provide them with this. We have set out below the legal basis for the business to process your data.

Some of our processing is necessary for compliance with a legal obligation. For example, ITS specialises in the recruitment of qualified, experienced Teacher and Senior Management for leading International Schools, and we will pass information to candidates about potential job roles. Please refer to our [Candidate Privacy Policy](#) for any information relating to candidates processing.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with providing you with recruitment or training services.

We will also communicate with you information about other services we can offer you and update you about our activities. Where your information is used other than in accordance with one of these uses, we will first obtain your consent to that use.

ITS take all reasonable steps to ensure that your personal data is processed securely and more information on this can be found on our website.

### **How long we keep it**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some cases, we may support candidates throughout their careers. We will conduct regular data-cleansing and updating exercises to ensure that any data we retain is accurate and necessary.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data or we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Sharing your personal data**

Your personal data will only be shared with third parties, including other data controllers where it is necessary for the performance of data controllers' tasks and where you first give us your prior consent. It is likely that we will need to share your data with;

- the Company's suppliers and contractors. For example, we may ask a supplier to maintain our database software, or to provide us with administration, IT and other related services; or
- our [Candidate Privacy Policy](#) also contains details of how we deal with the data provided by applicants; or

- another supplier for recruitment service where you have given prior consent.

### **Transferring information outside the EU**

We will transfer the personal information we collect about you across the world outside the EU (including but not limited, to the United Arab Emirates, Malaysia, New Zealand, Kenya, Singapore, Hong Kong, China or India) in order to perform our contract with you. There is not an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place appropriate measures. If you require further information about these measures, you can request it from [enquires@int-teachers.com](mailto:enquires@int-teachers.com).

## **SECTION 2**

At ITS, we are focused on implementing fair information practices that are designed to protect your privacy. If you have questions or wish to contact us about how your personal data will be processed please contact Amanda Gillam.

### **Data Collection**

We only collect personally identifiable information that is voluntarily provided by visitors to this Site (“Website Data”). The Website Data that ITS receives from site visitors includes name, title, address, email address, screen name and telephone and any other information provided by visitors in email messages or attachments.

Website Data will normally be collected in order to assist visitors to:

- register for areas of the site;
- request additional information;
- submit applications or a CV;
- enquire about services provided by ITS or the wider group; and
- register for events, courses and conferences.

It is ITS’s policy to limit the information collected to only the minimum information required to complete a Site visitor’s request.

ITS’s intention is not to seek any sensitive information through our site unless legally required for recruiting purposes, further details can be obtained in the candidate Privacy Notice. Sensitive information includes a number of types of data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, or criminal record.

### **Use of Website Data**

Website data obtained by the site is used for internal business purposes of ITS and in connection with a visitor’s request. This data is not shared with others for unrelated purposes unless stated in this Privacy Policy or otherwise communicated to the site visitor.

ITS makes every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the site has collected excessive information, we encourage the visitor to contact us at [enquiries@int-teachers.com](mailto:enquiries@int-teachers.com) to raise any concerns.

Except for instances where visitors explicitly choose to receive specific ITS marketing or other informational materials, ITS will not use personal data collected from our website to distribute marketing or informational materials.

### **Third Parties**

ITS's policy is to only disclose website data to third parties under the following circumstances;

- when explicitly requested by the visitor;
- when required to deliver materials requested by the visitor;
- when requested to facilitate events hosted by a third party; and
- when required to meet any other request of a visitor.

Categories of third parties that ITS may share personal identifiable information will include regulators, local government and other government, authorities or regulators in the country a customer operates and/or where the customer is located.

This site does not collect or compile personal identifiable information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

### **Third Party Links**

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.

### **Use of Cookies**

A cookie is a tiny element of data that a website can send to a visitor's computer's browser so that this computer will be recognised by the site on their return. Cookies allow our web server to recognise a computer on connection to the site, which in turn allows the server to make downloading of pages faster than on first viewing.

We only create two cookies and these cookies are absolutely necessary for the function of the website. These are "ASP.NET\_SessionId" and "JSESSIONID". "ASP.NET\_SessionId" stores a "Session ID" which is used by Microsoft .NET Framework to deliver the web pages to the visitor.

The New Relic JSESSIONID cookie is used to store a session identifier so that New Relic can monitor session counts for our applications. The cookie value is generated by Jetty. We use New Relic to help us track any potential server errors and review the performance of our hosting platforms.

These cookies expire at the end of sessions which is when you go to another website or close your window browser. Cookies used on the site are only active for the duration of the visit. Cookies used on this site are not stored on visitor's computer once you have closed your web browser. Information generated by the use of cookies may be compiled in an aggregate form so that no individual can be identified.

For more information about cookies, please see the ICO's website or contact enquiries@int-teachers.com.

### **Access**

Each visitor has the right of access to personal data they have submitted through this site. Any enquiries about the accuracy of information previously submitted, or requests to have information removed, should be directed to Amanda Maxwell.

### **Security**

All ITS directors and employees are instructed to follow the Company's security policy. Only authorised personnel are provided access to personally-identifiable information and these employees are required to agree to ensure confidentiality of this information.

ITS reserves the right to modify or amend this statement at any time. ITS will notify users of any material changes to the notice.

**Consent**

By continuing to use the site and by providing any personal data (including any sensitive personal data) to us via the site or email addresses provided on the site, visitors are consenting to our use of your personal data as set out in this Privacy Notice. Please do not send us any personal data if you do not want that information to be used by us in this manner.