

Guardians — UK —

Information Sharing and Data Protection Policy: Third Party Contractors

Guardians UK respects your privacy and is committed to protecting your personal data. This policy will explain how we look after your personal data and tell you about your privacy rights and how the law protects you.

We use third party contractors to help us in supplying our services to our customers (international students and their parents). These contractors include (but are not limited to) host families, drivers, DBS checking services and educational consultants.

We require our contractors to protect any personal data to which they have access and to share it only in accordance with our guidelines. We will train you in data protection compliance and give you written guidelines on information sharing and data protection procedures. We will then require you to sign an agreement that you will adhere to our guidelines. See **Guidelines for Contractors** at the end of this policy.

Summary of how we use your personal data

- Guardians UK uses your personal data:
 - where we need to perform the contract which we are about to enter into, or have entered into, with you;
 - 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 legal obligations;
 - where we have your consent.
- Personal data is shared with other companies for example to pay you for your services and with third parties such as:
 - other companies that assist us in performing our services;
 - our insurance providers;

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- accreditation organisations;
- companies carrying out DBS checks (where relevant and necessary).
- Where we rely on your consent, such as for marketing purposes, you can withdraw this consent at any time.
- This policy sets out more details of the processing, including details of your data protection rights, including your right to object to certain processing.

What information do we collect?

We collect and process personal data about you. This includes:

- your name, contact details, information for DBS checks, bank details
- communications that you may send to us.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract. This includes:
 - verifying your identity;
 - making payments;
 - communicating with you;
 - providing customer services by sharing your details when necessary with students, parents and schools;
 - we will use personal data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation), for example we may need to share personal data with an inspection authority to comply with our regulatory obligations.

Relying on our legitimate interests

We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this notice.

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Withdrawing consent

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your personal data for other purposes, such as those set out above.

Who will we share this personal data with, where and when?

Personal data will be shared with other individuals and organisations as set out above such as schools, students, parents, insurers and organisations which conduct background checks, where necessary.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of a Controller for the purposes identified above. In particular, we use third party providers of website hosting and maintenance, identity checking, educational consultancy providers and business development services.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**, and to ask us to **share (port) this personal data with another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the personal data to meet a contractual or other legal requirement, or where we are using the personal data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, or to obtain other information, such as a copy of a legitimate interests balancing test, you can get in touch with us via our Data Protection Controller using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection

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authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK.

How will you keep my personal data safe?

We will keep all personal data in a password protected electronic database which only our own staff can access. Any paper copies which may need to be made will be kept in a locked cupboard in the lockable Guardians UK office.

The transmission of information via the internet is not completely secure and such transmission from you to us is therefore at your own risk. Any password protection used relies upon you keeping the password confidential.

How long will you retain my personal data?

We only retain your personal data for as long as is required by law, or for as long as necessary for the purposes for which we process your personal data. This is ordinarily 6 years after you have ceased to be our contractor.

How do I get in touch with you?

We hope that we can satisfy queries you may have about the way we process your personal data. If you have any concerns about how we process your personal data, or would like to opt out of direct marketing, you can get in touch with our Data Protection Controller by email on info@guardiansuk.com

Which Controller entity is my data controller, and which affiliates might my personal data be shared with?

The data Controller for your information is the entity with which you have a relationship; in this case Guardians UK. It is likely that your personal data would only be shared within Guardians UK.

Guidelines for Contractors

We require our contractors to protect any personal data on Guardians UK students and parents to which they have access and to share it only in accordance with our guidelines. We will train you in data protection compliance, information sharing and data protection procedures. We will then require you to sign an agreement that you will adhere to our guidelines as follows:

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- All Guardians UK personal data is stored on a password encrypted database. The database must remain in an encrypted fashion at all times and not be stored unencrypted elsewhere.
- Any breach of this will be treated as gross misconduct.
- Where specific data needs to be transferred from the database e.g. in order for a host family or driver to complete a service, this data will comprise the minimum necessary for the service to be completed.
- The data, if sent electronically, will be password protected. If it is necessary for the data to be held on paper e.g. when meeting a student at an airport or transporting them to a school, the contractor must destroy the personal data that they hold once the service has been completed.
- Data must not be shared with any other party except Guardians UK personnel.
- If any breach of personal data occurs, the contractor must inform Guardians UK immediately.
- Failure to inform Guardians UK of such a breach will be treated as gross misconduct.