

## COMBINATION LANGUAGES LLP – DATA PROTECTION POLICY

<b>Document Name:</b>	<b>Data Protection Policy</b>
Review Schedule	Every two years
Next review due	May 2026
Owner (Responsibility)	Suzanne Comben – Data Protection Officer

### Document Description

Here at Combination Languages LLP we understand the concerns about how data may be stored, sent and used by companies. We are committed to complying with all data protection laws and we want you to feel confident in the measures that we are taking to uphold your data privacy rights.

This privacy policy explains how we, Combination Languages LLP, collect and use your personal information. In it we explain the types of information we collect, how we collect it, what we use it for and who we may share your personal information with. We also let you know what rights you have over your information.

We adhere to The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) which came into place on 25 May 2018

The Regulations cover both written and computerised information and the individual's right to see such records.

It is important to note that the Regulations also cover records relating to staff and volunteers.

All Combination Languages LLP staff are required to follow this Data Protection Policy at all times.

The DPO has overall responsibility for data protection within Combination Languages LLP but each individual processing data is acting on the controller's behalf and therefore has a legal obligation to adhere to the Regulations.

### Quality Assurance

This Policy shall stay in force until any alterations are formally agreed.

The Policy will be reviewed every two years by the Members of the LLP and the DPO at that time in position, sooner if legislation, best practice or other circumstances indicate this is necessary.

All aspects of this Policy shall be open to review at any time.

# Data Protection Policy

## Definitions

**Processing of information** – how information is held and managed.

**Information Commissioner** - formerly known as the Data Protection Commissioner.

**Notification** – formerly known as Registration.

**Data Subject** – used to denote an individual about whom data is held.

**Data Controller** – used to denote the entity with overall responsibility for data collection and management. Combination Languages LLP is the Data Controller for the purposes of the Act.

**Data Processor** – an individual handling or processing data

**Personal data** – any information which enables a person to be identified

**Special categories of personal data** – information under the Regulations which requires the individual's explicit consent for it to be held by Combination Languages LLP.

## Data Protection Principles

As data controller, Combination Languages LLP is required to comply with the principles of good information handling.

**These principles require the Data Controller to:**

- Process personal data **fairly, lawfully and in a transparent manner.**
- Obtain personal data only for one or more **specified and lawful purposes** and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
- Ensure that personal data is **adequate, relevant and not excessive** for the purpose or purposes for which it is held.
- Ensure that personal data is **accurate** and, where necessary, **kept up-to-date.**
- Ensure that personal data is not kept for any longer than is necessary for the purpose for which it was obtained.
- Ensure that personal data is kept secure.
- Ensure that personal data is not transferred to a country outside the UK or the European Economic Area unless the country to which it is sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.

## Consent

Combination Languages LLP must record service users' explicit consent to storing certain information known as 'personal data' or 'special categories of personal data' on file.

For the purposes of the Regulations, personal and special categories of personal data cover information relating to:

- The racial or ethnic origin of the Data Subject (***this might be shared with us through a request for Halal meat as a dietary requirement***)
- His/her political opinions.



- His/her religious beliefs or other beliefs of a similar nature.
- Whether he/she is a member of a trade union.
- His/her physical or mental health or condition (***this might be shared with us through dietary requirements or details for Host Families***)
- His/her sexual life.
- The commission or alleged commission by him/her of any offence
- Online identifiers such as an IP address
- Name and contact details
- Genetic and/or biometric data which can be used to identify an individual

## What information might we collect about you?

We do our best to keep the information we collect about you to the minimum necessary. The information that we collect from you will depend on your role; Host Family, Student or Teacher from the Trip School (those leaving their country to visit a foreign destination) or Student or Teacher from the Host School (those staying in their own school and welcoming a foreign group of students into their school).

Personal information collected by Combination Languages LLP will, in the main, relate to:

1. Names of members of Host Families, Students from the Host School and Students from the Trip School who will be participating in the educational visit
2. Ages of Children in Host Families
3. Dates of Birth of Students from the Host School and Students from the Trip School who will be participating in the educational visit
4. Year group of the Students from the Host School and Students from the Trip School who will be participating in the educational visit
5. Home addresses of Host Families
6. Telephone numbers of Host Families, Students from the Host School and Students from the Trip School who will be participating in the educational visit
7. Email addresses of Host Families, Students from the Host School and Students from the Trip School who will be participating in the educational visit
8. Bank/building society details of the parents of the Host Family
9. Passport details (Advanced Passenger Information as required by airlines including Passport Number, Place of Issue, Expiry Date and Passenger's Nationality, Date of Birth and Gender) of Students and Accompanying Teachers from the Trip School
10. Dietary requirements and allergies of students and teachers from Trip School (NB this involves telling us about your health and / or religion if you need certain types of food to avoid an allergy or types of meat for religious reasons)
11. Details of students' likes, dislikes, hobbies and interests from the French / Spanish / German Trip School (to help place students with likeminded Host Families)
12. Details about your booking with us: Details such as where you are travelling from and to, your booking information (including anyone else on the booking), any onward travel details if relevant, details of experiences or excursions booked through us, baggage requirements, meal preferences or requirements, details of any special assistances required and any other relevant information so that we can provide you with the travel or other service you have arranged with us.
13. Job applications: If you apply for a job with us, your CV, work history, educational details and the role you are applying for.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to provide the goods or services that you have booked. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Consent is not required to store information that is not classed as special category of personal data as long as only accurate data that is necessary for a service to be provided is recorded.

As a general rule Combination Languages LLP will always seek consent where personal or special categories of personal information is to be held.

It should also be noted that where it is not reasonable to obtain consent at the time data is first recorded and the case remains open, retrospective consent will be sought at the earliest appropriate opportunity.

## How do we collect your data and why?

We collect data from you through direct interactions in order to provide the service that you have requested.

You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone and email or otherwise, this includes personal data you provide when you:

- book a Language Immersion Experience or request information about a Trip
- provide us with information about an accident, illness or incident that occurred or some other feedback
- apply for a job with us by email or via the site
- agree to host a foreign school group and allow a group of your students to participate
- apply to be a Host Family and take part in the introduction meeting at your home

## Obtaining Consent

Consent may be obtained in a number of ways and consent will be recorded on or maintained with the case records:

- **Face-to-face/written:** A pro-forma Host Family Details Form will be used. One of the parents/adults of the prospective host family will be asked to provide consent on behalf of all members of the and the scope of that consent.
- **Email/written:** For both Trip and Host Schools, forms will be emailed to the Lead Teacher to complete with students' and teachers' details.
- **Telephone:** Verbal consent will be sought and noted on the case record if necessary

In the case of existing or prior host families where a face-to-face interview is not required, consent can be sought by email. If no response received, the host family details will be deleted permanently within 3 months of the initial email request.

Consent obtained for one purpose cannot automatically be applied to all uses e.g. where consent has been obtained from a host family in relation to information needed for the purposes of offering to host students, separate consent would be required if, for example, direct marketing of future trips was to be undertaken.

Preliminary verbal consent (recorded immediately on a google form) will be sought at the initial Host Family interview meeting as personal and/or special categories of personal data will need to be recorded either in an email or on a computerised record. Verbal consent is to be recorded in the initial email response to the prospective host family. Although written consent is the optimum, verbal consent is the minimum requirement.

Combination Languages LLP will seek consent to retain host family contact details in order that they may be asked if they would like to host future visits. If that consent is not given, host family information will be permanently deleted within 3 months of the final day of the educational visit. Consent can be withdrawn by the host family at any time.

## Permission for photographs

Specific consent for use of any photographs and/or videos taken will be obtained in writing. Such media could be used for, but not limited to, publicity material, press releases, social media, and website. Consent should also indicate whether agreement has been given to their name being published in any associated publicity. If the subject is less than 18 years of age then parental/guardian consent will be sought.

Please note that it is also possible to just give permission for a student to be included in the photograph for end of visit Certificate and no others.

## What do we use your information for?

Under data protection laws we are allowed to use personal information only if we have a proper reason to do so such as:

- to fulfil a contract that we have with you
- when it is our legal duty
- when you consent to it

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- **To manage your reservation with us IF YOU BOOK A TRIP WITH US.** We will use your information to provide you with the Language Immersion Experience that you purchase. This entails booking your flights, accommodations, organising tours, transportation and providing you with your tickets (on the basis of performing our contract with you) and providing you with any special assistance you require (where you give us your consent).
- **To contact you with information about your bookings and support services IF YOU BOOK A TRIP WITH US:** We will use your contact details to send you communications which relate to your Language Immersion Experience. The types of information usually included would be: e-mails responding to enquiries, providing you with tickets, alerting you to changes in itineraries or responding to any questions that you have. We do these things in order to fulfil our contract with you and on the basis of our legitimate business interest of providing you with customer service.
- **To organise your students with Pen-Pals and into Teams IF YOU ARE A HOST SCHOOL:** We will use your Students' data to pair them up to a foreign Pen-Pal and to organise the mixed teams for the bilingual activities. We may request your students'

parents' email addresses so that they can support their children and so that we can follow up any issues without having to disturb the Lead Teacher. We do these things in order to fulfil our contract with you and on the basis of our legitimate business interest of providing you with customer service.

- **To let Students that you are hosting know a bit about you IF YOU ARE A HOST FAMILY:** We will pass on your Family Details, Address, Telephone Number and Email address to the foreign students who will be staying with you during an educational visit. Your information will also be shared with the Lead Teacher of the Trip School and possibly with the Lead Teacher of the Host School (upon request). We do this in order to fulfil our contract with the Host Students and on the basis of our legitimate business interest of providing both the Host Students and you with customer service as you will also receive personal information about the Host Students.
- **To let Host Families and Pen-Pals know a bit about you and how to get in touch with you IF YOU ARE A STUDENT FROM A FRENCH / SPANISH OR GERMAN TRIP SCHOOL:** We will share your Name, Age, Email address and Gender with your Pen-Pal in order to establish communication. We will share your Name, Age, Email address, Likes, Dislikes and details of your siblings with your Host Family so that they can begin to get to know you and also to get in touch with you before you arrive. We do these things in order to fulfil our contract with you and on the basis of our legitimate business interest of providing you with customer service.
- **To send you information about possible future trips or group visits IF YOU HAVE SHOWN INTEREST IN A TRIP WITH US OR IN HOSTING A FOREIGN SCHOOL GROUP.** We will use your information to contact you in order to keep you up to date with the latest possible group visits available to either book or host and promotions that we consider may be of interest or relevant to you. We will usually only do this when we have your consent to do so or on the basis of our legitimate interest to provide you with customer service. Please see the Marketing section below for more information. You can opt out of these types of communication at any time by contacting us.
- **To process your job applications IF YOU APPLY TO WORK WITH US.** We will use your information to process any job applications that you submit to us, whether directly or via an agent or recruiter (speculatively or in response to any ad) on the basis of our legitimate interest to recruit new employees or contractors.

## Marketing

We may occasionally contact teachers in schools to see if you might be interested in running a Language Immersion Experience for your students, to ask if you might like to host a foreign school group in your school or to let you know about something that we think might be of interest/relevance to you.

We may contact Host Families to see if they would like to host again.

We will only contact you in this way if:

- You have signed up to receive communications from us and have not later told us that you don't want to hear from us.



- You have made a booking with us or hosted a foreign school group and have not told us that you do not want to hear from us.

You can ask us to stop contacting you at any time by simply letting us know.

We do not pass your information to other parties for marketing purposes.

## Sharing your personal data

We will only share your personal data with suppliers that we work with in order to provide your Language Immersion Experience. These third parties include airlines, hotels, transport companies, visitor attractions, airport authorities, insurance companies, host schools and host families.

Your data will only be used in the UK or European Economic Area (“EEA”).

## Your personal data rights

We would like to reassure you that you have control of your personal information. Here are the rights that you have in relation to the personal information that we hold about you:

- The right to be advised of how we will use your personal information. This is set out in this data protection policy and we do our best to provide you with as much information as we can when you give us your data.
- The right to ask us to correct any information that you believe is incorrect.
- The right to ask us to not to use your information for marketing purposes.
- The right to receive a copy of the personal data that we hold about you. Data Subjects can ask, in writing to the DPO, to see all personal data held on them, including e-mails and computer or paper files. The Data Processor Officer must comply with such requests within 30 days of receipt of the written request.
- In certain circumstances, the right to ask us to stop using information about you.
- The right to ask us to limit or cease processing or erase information we hold about you in certain circumstances.
- The right to withdraw consent that you have provided to us to use your personal information.
- The right to restrict processing – where processing is restricted, Combination Languages LLP is permitted to store the personal data but not further process it. Combination Languages LLP can retain just enough information about the individual to ensure that the restriction is respected in the future.
- The right ‘to be forgotten’

If you wish to exercise any of these rights please contact us.

# Ensuring the Security of Personal Information

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we ensure that details about your personal data are only communicated on a strict need to know basis. Care is taken that conversations containing personal or special categories of personal information may not be overheard by people who should not have access to such information. Those given access will only process your personal data on our instructions and they are subject to a duty of confidentiality.

It is an offence to disclose personal information 'knowingly and recklessly' to third parties.

## Use of Files, Books and Paper Records

In order to prevent unauthorised access or accidental loss or damage to personal information, it is important that care is taken to protect personal data. Paper records are kept in locked cabinets/drawers overnight and care will be taken that personal and special categories of personal information is not left unattended and in clear view during the working day.

## Disposal of Scrap Paper, Printing or Photocopying Overruns

Names/addresses/phone numbers and other information written on scrap paper are also considered to be confidential. Any scrap paper that contains personal information will be shredded or burned.

## Computers

Computers are not networked and access to personal and special categories of personal information is restricted by password to authorised personnel only.

Firewalls and virus protection are employed at all times to reduce the possibility of hackers accessing our PCs and thereby obtaining access to confidential records.

Documents will be stored on individual computers.

Where computers or other mobile devices are taken for use off the premises the device will be pin number or password protected.

Documents used to collect Personal Data (such as API and Dietary Requirements) are password protected.

The following statement is to be included on any forms used to obtain personal data:

We promise never to share or sell your information to other organisations or businesses and you can opt out of our communications at any time by telephoning 07974 563137, writing to Combination Languages LLP at 18A Hollingdean Terrace, Brighton, BN1 7HA or by sending an email to [info@combinationlanguages.com](mailto:info@combinationlanguages.com) or [suziecomben@gmail.com](mailto:suziecomben@gmail.com)



## Privacy Statements

Any documentation which gathers personal and/or special categories of personal data should contain the following Privacy Statement information:

- Explain who we are
- What we will do with their data
- Who we will share it with
- How long we will keep it for
- That their data will be treated securely
- How to opt out

## Personnel Records

The Regulations apply equally to volunteer and staff records. Combination Languages LLP may at times record special categories of personal data with the volunteer's consent or as part of a staff member's contract of employment.

For staff and volunteers who are regularly involved with children, Combination Languages LLP applies to the Disclosure & Barring Service to request a disclosure of spent and unspent convictions, as well as cautions, reprimands and final warnings held on the police national computer. Any information obtained will be dealt with under the strict terms of the DBS Code. Access to the disclosure reports is limited to the Members and the DPO

## Retention of Records

Records will be retained for the following periods at the end of which they are shredded or permanently deleted:

Passenger Passport Details – directly after trip

Host family records – 6 years after ceasing to be a host family

Staff records – 6 years after ceasing to be a member of staff

Volunteer records – 6 years after ceasing to be a volunteer

Pen-Pal records – 7 years after application made

Financial documents – 7 years

Employer's liability insurance – 40 years

## What to Do If There Is a Breach

If a data protection breach is discovered or suspected, it will be reported to the Members of the LLP and/or DPO who will review our systems to prevent a reoccurrence. A determination of whether it needs to be reported to the Information Commissioner will be carried out and, if deemed necessary, any breach must be reported within 72 hours of its occurrence.

# The Information Commissioner

The Information Commissioner's office is at:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Switchboard: 01625 545 700

Email: [mail@ico.gsi.gov.uk](mailto:mail@ico.gsi.gov.uk)

**Data Protection Help Line:** 01625 545 745

**Notification Line:** 01625 545 740

The following are criminal offences, which could give rise to a fine and/or prison sentence:

- The unlawful obtaining of personal data
- The unlawful selling of personal data
- The unlawful disclosure of personal data to unauthorised persons

## Final Word

We want you to feel secure when working with us so if you have any concerns or queries please contact us immediately by telephoning 07974 563137, writing to Combination Languages LLP at 18A Hollingdean Terrace, Brighton, BN1 7HA or by sending an email to [info@combinationlanguages.com](mailto:info@combinationlanguages.com) or [suziecomben@gmail.com](mailto:suziecomben@gmail.com)

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

