



### English Path

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# English Path Global Privacy Policy

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## Introduction

This Privacy Policy outlines how English Path collects, uses, stores, and protects personal data across all its global campuses. It reflects our commitment to safeguarding privacy in compliance with international data protection laws and accreditation standards. The policy applies to all students, staff, partners, and website users, and ensures transparency, accountability, and respect for individual rights.

*Translations available – please ask Student Services*



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## 1. Purpose

The purpose of this Privacy Policy is to outline how English Path (“EP”, “we”, “our”, or “us”) collects, uses, stores, shares, and protects personal data across all campuses and operational jurisdictions. This policy ensures transparency and accountability in our data processing activities in compliance with applicable international, national, and accreditation-based privacy requirements.

EP is committed to protecting the privacy of all data subjects—including students, employees, contractors, applicants, partners, website users, and other stakeholders. Our policy ensures that personal data is processed lawfully, fairly, and transparently, and in alignment with the principles of:

- The **General Data Protection Regulation (GDPR)** applicable in Ireland, Malta, Spain, and Germany
- The **UK GDPR and Data Protection Act 2018**
- The **Australian Privacy Act 1988** and **Australian Privacy Principles (APPs)**
- **PIPEDA** (Personal Information Protection and Electronic Documents Act) in Canada
- The **UAE Federal Decree Law No. 45 of 2021 on the Protection of Personal Data**
- The **Saudi Arabian Personal Data Protection Law (PDPL)** of 2021

This policy also reflects the standards required by educational accreditation bodies, including:

- **British Council Accreditation UK (Criteria 2024)**
- **Quality and Qualifications Ireland (QQI)**
- **ASQA and ELICOS standards**
- **Eaquals Quality Standards (v7.3)**

The purpose of this policy is to:

- Inform data subjects of the personal data EP collects and processes;
- Define EP’s obligations regarding data protection and compliance;
- Establish a governance framework to support continuous improvement and internal accountability; and
- Reassure stakeholders that personal data will be handled with integrity, security, and respect for privacy.

## 2. Scope

This Privacy Policy applies to all personal data collected, processed, stored, or shared by English Path (“EP”) in connection with its global operations. It applies to:

- All individuals who interact with EP, including:
  - Prospective, current, and former students, both adults and young learners
  - Parents and guardians of students where applicable
  - Job applicants, employees, contractors, and volunteers



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- Agents, partners, and service providers
  - Visitors to EP websites or physical campuses
- All EP locations in:
  - Ireland, United Kingdom, Australia, Malta, Spain, Germany, Canada, United Arab Emirates (UAE), and Saudi Arabia
- All forms of personal data processed by EP, including:
  - Identifiers (name, contact details, student ID, government-issued ID numbers)
  - Academic and enrolment information
  - Employment and application data
  - Health or disability disclosures (where relevant to student support or employment)
  - Financial information (e.g., tuition, payment processing)
  - Website usage data (via cookies, analytics, and session logs)
- All EP systems and processes that handle personal data, including:
  - Student information management systems
  - HR and payroll systems
  - Learning management platforms
  - Website and marketing technologies
  - Internal communication and data storage platforms

This policy covers personal data in any format, including digital, paper-based, and verbal communications, and governs how EP complies with applicable data protection laws and accreditation standards in each jurisdiction.

Where additional obligations exist at a specific EP campus due to local law (e.g., safeguarding laws in Ireland or the UAE), those obligations are met through site-specific adaptations or local procedures aligned with this policy.

### 3. Definitions

For the purposes of this Privacy Policy, the following terms shall have the meanings set out below. These definitions align with applicable laws in the jurisdictions in which English Path operates and are informed by the standards of the British Council, QQI, and ASQA.

**Consent:** Freely given, specific, informed, and unambiguous indication of a Data Subject's wishes by which they signify agreement to the processing of personal data. For under-18s, additional consent mechanisms apply in some jurisdictions.

**Cookies:** Small data files placed on a user's device when accessing EP websites. Cookies are used for analytics, personalisation, and tracking, in line with EP's Cookie Policy.

**Cross-border Data Transfer:** The movement of personal data to countries outside the originating jurisdiction. Such transfers must meet local adequacy, safeguard, and consent requirements.



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**Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

**Data Controller:** English Path (EP), referred to in this policy as “we,” “us,” or “our,” which determines the purposes and means of processing personal data.

**Data Processing:** Any operation performed on personal data, including collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.

**Data Processor:** A third party that processes personal data on behalf of English Path under contractual obligations.

**Data Protection Officer (DPO):** The designated person at GEDU who oversees compliance with this policy and all applicable privacy legislation. Contact: [compliance@englishpath.com](mailto:compliance@englishpath.com)

**Data Subject:** The individual to whom the personal data relates, such as students, staff, applicants, and website users.

**Lawful Basis:** The justification required by law to process personal data. These may include consent, contractual necessity, legal obligation, vital interests, public task, or legitimate interests, as defined under GDPR and comparable laws.

**Minor/Young Learner:** An individual under the age of 18, in accordance with the definition used for safeguarding and consent purposes under local law and accreditation requirements.

**Personal Data / Personal Information:** Any information relating to an identified or identifiable natural person, including names, identification numbers, location data, online identifiers, and factors specific to an individual's physical, physiological, genetic, mental, economic, cultural, or social identity. This includes information protected under the GDPR (EU/UK), PIPEDA (Canada), Privacy Act (Australia), UAE Decree Law No. 45 of 2021, and the Saudi Arabian PDPL.

**Special Category Data / Sensitive Information:** A sub-category of personal data that includes details about racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic data, biometric data (where used for identification), health data, or sexual orientation. Processing of this data is subject to additional protections under applicable laws.

**Third Party:** Any natural or legal person, public authority, agency, or body other than the data subject, controller, processor, or persons authorised to process data under the controller's authority.

## 4. Responsibility

English Path is the data controller for all personal data it collects and processes across its global operations. We are responsible for ensuring that data is handled in compliance with applicable laws and accreditation requirements.



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We have appointed a **Data Protection Officer (DPO)** to oversee privacy compliance. The DPO can be contacted on [compliance@englishpath.com](mailto:compliance@englishpath.com).

Responsibilities include:

- Ensuring compliance with GDPR, UK DPA, PIPEDA, PDPL, and other data laws
- Responding to data subject rights requests and data breaches
- Advising on privacy risks and safeguards
- Maintaining records of processing and liaising with regulators

All EP staff and contractors are required to:

- Follow this policy
- Complete mandatory data protection training
- Report suspected data breaches or misuse of information promptly

Site-specific privacy obligations (e.g., safeguarding for minors, local legal constraints) are managed by each campus in line with this global policy.

## 5. Policy and Procedure

### 5.1 Lawful Basis for Processing

English Path processes personal data in accordance with applicable data protection laws, including the Irish and EU GDPR, UK GDPR, Australian Privacy Act, PIPEDA, UAE and Saudi Arabian privacy laws.

Where personal data relates to young learners, we obtain parental or guardian consent in line with jurisdictional requirements and apply enhanced safeguards

We only process personal data where we have a lawful basis to do so. These may include:

- **Consent:** For optional communications and marketing where you have explicitly consented.
- **Contractual necessity:** To manage student enrolments, provide education and support services, and to meet our obligations under student or employment contracts.
- **Legal obligation:** For compliance with immigration laws, taxation, and regulatory reporting (e.g. to QQI or other accreditation bodies).
- **Vital interests:** To protect the health and safety of students or staff in emergency situations.
- **Legitimate interests:** Where necessary to pursue our legitimate interests (e.g., improving services), unless those interests are overridden by your rights

Where consent is the legal basis, it is always freely given, informed, and can be withdrawn at any time. The legal basis for processing is recorded and reviewed in accordance with local and accreditation requirements.

Where we rely on *legitimate interests* as a lawful basis for processing personal data, our interests include:



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- Maintaining the security and integrity of our IT systems and premises
- Improving our educational and administrative services
- Monitoring and evaluating our programmes for quality assurance
- Contacting former students about alumni opportunities, unless they opt out

In all cases, we have balanced our interests against your rights and freedoms and determined that they are not overridden.

## 5.2 Data Collection and Use

English Path collects personal data to deliver educational services, support student wellbeing, manage employment relationships, meet legal obligations, and improve operations.

We only collect the minimum necessary personal data, which may include:

- Identity and contact details
- Academic, financial, and enrolment information
- Employment and application records
- Health or accessibility disclosures (where required)
- Website usage data through cookies and analytics tools

Personal data is collected from students, staff, applicants, visitors, partners, and digital platforms. It is used only for the purposes for which it was collected or for compatible, clearly communicated purposes.

Where legally required or reasonably expected, we inform individuals about the purpose of collection, the legal basis, and their rights at the point of data capture.

In some cases, the provision of personal data is required by law (e.g., immigration compliance) or under the terms of a contract (e.g., enrolment agreements). If you do not provide the requested information, we may be unable to:

- Process your application
- Enrol you on a course
- Comply with visa and legal obligations
- Fulfil our contractual obligations to you as a student or employee



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### 5.3 Data Sharing and Disclosures

English Path shares personal data only where necessary and lawful, and in line with applicable privacy legislation.

Data may be shared with:

- Government bodies and regulators such as visa and immigration authorities
- Accreditation agencies (QQI, British council and other regulators for inspection purposes)
- Service providers (e.g., IT, payment, learning platforms)
- Academic agents or representatives (with student consent)
- Professional advisers (e.g., legal, insurance, auditors)
- Institutions or third parties in the event of a business change or merger

All third parties are required to handle data securely and in accordance with contractual and legal obligations. Where possible, only the minimum necessary information is shared.

Information may also be shared internally across departments to support the student journey or manage staff and services, in line with data protection principles.

### 5.4 Cross-border Data Transfers

As a global education provider, English Path may transfer personal data between countries where we operate, including the UK, EU/EEA, Australia, Canada, UAE, and Saudi Arabia.

Such transfers are made in compliance with local data protection laws and subject to appropriate safeguards. These may include:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Data transfer agreements
- Other legally approved mechanisms

We ensure that personal data remains protected to the same standard, regardless of the country in which it is processed.

### 5.5 Data Security

English Path uses secure, access-controlled data management systems to store and manage personal data, including student information systems, HR platforms, and learning management systems. These systems are protected by role-based, password-protected access, with all activity logged for traceability. Personal data is





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retained or securely deleted in line with documented retention schedules and applicable legal and accreditation requirements.

To safeguard personal data against unauthorised access, loss, misuse, or disclosure, English Path implements robust technical and organisational security measures. These include:

- Role-based access controls, ensuring only authorised individuals with a legitimate need can access data
- Encrypted storage and secure communication protocols
- Regular staff training on data protection and responsibilities
- Periodic security audits and risk assessments
- Secure backup held on Microsoft SharePoint and password protected.

In the event of a suspected data breach, English Path follows established procedures that include immediate containment, internal reporting, and, where required, notification to affected individuals and regulatory bodies, in compliance with applicable legal obligations.

## 5.6 Data Retention

English Path retains personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by law, regulation, or accreditation standards. Please see our Data Retention Policy for full details (available [here](#)).

Retention periods are determined based on:

- Legal and regulatory obligations
- Accreditation and audit requirements
- Operational needs
- Contractual commitments

When data is no longer required, it is securely deleted or anonymised in line with our data retention schedule.

## 5.7 Data Subject Rights

Under data protection laws, individuals have rights over their personal data. These may include the right to:

- Access their data
- Correct inaccurate or incomplete data
- Request deletion (where legally permitted)
- Restrict or object to processing
- Withdraw consent at any time (where consent is the lawful basis)



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- Request data portability (in applicable cases)
- Lodge a complaint with a data protection authority

Requests concerning the personal data of young learners may be made by their legal guardians, subject to verification and applicable legal permissions.

Requests can be made by contacting our Data Protection Officer at: [compliance@englishpath.com](mailto:compliance@englishpath.com) . We respond to all valid requests within the legally required timeframe, unless a longer period is permitted due to complexity or volume.

## 5.8 Student and Staff Responsibilities

All English Path students and staff are responsible for handling personal data in a lawful and respectful manner. All new employees at English Path receive data protection and privacy training as part of their onboarding process.

Staff are reminded that the handling of young learner data must be done with particular care and in accordance with our Safeguarding Policy.

Individuals must:

- Keep their own contact and personal details up to date
- Treat any personal data they access as confidential
- Avoid sharing or accessing data without proper authorisation
- Report any data breaches or concerns to the Data Protection Officer

Misuse of personal data or failure to follow data protection rules may lead to disciplinary action.

## 5.9 Use of Technology and Cookies

English Path uses digital tools and platforms to deliver services and enhance the user experience. These may collect data such as device type, location, browser activity, and user behaviour through analytics services.

Our websites use cookies to:

- Monitor website performance and usage
- Improve functionality and personalisation
- Support digital marketing

Users can control cookie settings through their browser and access our full Cookie Policy on the website. Some site functions may not work properly if cookies are disabled.



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### 5.10 Automated Decision-Making and Profiling.

English Path does **not** use personal data for automated decision-making, including profiling, that produces legal effects or significantly affects individuals. Should this change in the future, we will update this Privacy Policy and notify affected individuals as required by law.

### 5.11 Breach Notification and Complaints

English Path has procedures in place to detect, investigate, and respond to personal data breaches.

If a breach occurs that may pose a risk to individuals' rights, we will notify affected individuals and the relevant data protection authority as required by law.

Individuals can raise concerns or lodge complaints by contacting the Data Protection Officer at [compliance@englishpath.com](mailto:compliance@englishpath.com).

We encourage individuals to contact us first before escalating concerns to their local data protection authority.

## 6. References and related policies

This policy is informed by the following legal frameworks and international standards:

### Legal References

- **General Data Protection Regulation (EU) 2016/679 (GDPR)** – Ireland, Malta, Spain, Germany
- **UK GDPR and Data Protection Act 2018** – United Kingdom
- **Privacy Act 1988 and Australian Privacy Principles (APPs)** – Australia
- **PIPEDA (Personal Information Protection and Electronic Documents Act)** – Canada
- **Federal Decree Law No. 45 of 2021 on the Protection of Personal Data** – UAE
- **Personal Data Protection Law (2021)** – Saudi Arabia

### Accreditation Standards

- **British Council Accreditation UK – Criteria 2024 (M4, M5)**
- **QQI Code of Practice for Provision of Programmes of English Language Education (Section 6.1)**
- **QQI Statutory QA Guidelines for ELE Providers (QP13/IEM 04)**
- **Eaquals Quality Standards Version 7.3 (2025)**
- **ASQA Standards for RTOs and CRICOS Providers (Australia)**
- **ELICOS Standards 2018**



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## Related [Policies](#)

- Safeguarding Policy (location-specific)
- Student Code of Conduct
- Student Disciplinary Policy and Procedures
- Statement of Student Rights and Responsibilities
- Data Retention Policy
- GDPR Policy

## 7. Forms

- Data Rights Request form.

## 8. Policy review

This Privacy Policy is reviewed annually, or more frequently if required by changes in law, regulatory guidance, or operational practice.

The review process includes:

- Legal and jurisdictional revalidation
- Accreditation standards alignment
- Feedback from key stakeholders (students, staff, DPO)
- Approval by the Managing Director

Version control is maintained, and the most current version is made available on the English Path website and at all campus locations.

**Next review due:** November 2026

**Policy owner:** Data Protection Officer

**Contact:** [compliance@englishpath.com](mailto:compliance@englishpath.com)

## 9 – Appendices

Appendix A: Learner Privacy Summary for Students (in Plain English)

Appendix B: Data Rights Request Form

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## **Appendix A: Learner Privacy Summary (Plain English)**

### **Your Data and Your Rights – Quick Guide**

At English Path, we take your privacy seriously. This is a short summary of how we use your personal information.

#### **We collect your data to:**

- Register you on a course
- Support your learning and welfare
- Meet legal or visa requirements

#### **We may share it with:**

- Education authorities
- Immigration or offices
- Trusted service providers (e.g., for IT or payments)

#### **You have rights:**

- See your data
- Fix mistakes in it
- Ask us to delete it
- Say no to marketing

**To use your rights or ask questions**, email: [info@englishpath.com](mailto:info@englishpath.com)

**Need more help?** You can contact your local data protection authority for advice or to make a complaint.

*Translations available – please ask Student Services.*



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## Appendix B: Data Rights Request Form

### Data Rights Request Form

Use this form to request:

- A copy of your personal data
- A correction to incorrect data
- Deletion of your data
- A restriction on processing
- Data transfer to another provider
- Objection to data use

Your name: \_\_\_\_\_

Student/staff ID (if known): \_\_\_\_\_

Email address: \_\_\_\_\_

Type of request: ☐ Access ☐ Rectification ☐ Erasure ☐ Restriction ☐ Objection ☐ Portability

Details of your request: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please return this form to info@englishpath.com or Reception. We will respond within **30 days**. We may need to verify your identity.