



**English
Path**

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English Path Privacy Policy

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English Path is the trading name of Language Path Education Limited, part of the Global Education Group (GEDU from now on). As English Path operates under GEDU, English Path's Privacy Policy is aligned with the GEDU GDPR, related UK data protection legislation and the GEDU Privacy Policy.

1. Introduction

English Path gathers and processes your personal information in accordance with this privacy notice and in compliance with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

This notice provides you with information regarding your rights and our obligations, and explains how, why and when we process your personal data.

English Path or otherwise known as EP is the data controller and we are responsible for your personal data (referred to as 'EP', 'we', 'us' or 'our' in this privacy notice).

We have appointed a Data Protection Officer who oversees privacy related matters for the GEDU who can be contacted at compliance@globalbanking.ac.uk

2. Information that we collect

EP processes personal information to meet our legal, regulatory, statutory and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first. EP collects information from the following:

a. Visitors to our website which include:

- www.englishpath.com

b. Enquiries, visitors and survey respondents

- People who email English Path or filling in our forms
- People who call English Path
- People who contact English Path via social media
- People who respond to English Path Survey
- Visitors to our office

c. Current and former student

- details when students apply for a course at the English Path
- when students enrol at the English Path and progress through the course
- data received from external sources and external referees

d. Our colleagues

- Our staff, board members, contractors, volunteers and people who apply to work with us. You don't have to create an account or provide us with any personal information when you access the EP website. We may ask for some personal details if you access some of our services for example:
 - To order a prospectus
 - To make an enquiry

If you use one of our website forms or if you contact us by email we may collect and process personal information about you. This may include:

- Your contact details including your address and phone number
- Your email addresses
- Your name, title, date of birth and gender

- Education or professional details
- Attendance at English Path events

We may automatically collect certain data from you as you use our website by using cookies and similar technologies.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at compliance@globalbanking.ac.uk . In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

3. How we use your personal data

English Path takes privacy seriously and will never disclose, share or sell your data without your knowledge.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We only retain your data for as long as it necessary.

We will only use your data for the purposes for which we have collected for, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

During its activities, English Path will use student data to carry out its functions and to provide services to student as part of student journey. Due to the vast amount of activities English Path undertakes, it is not possible to state every instance where student data will be used, however English Path is committed to ensure student data is only used in carrying out English Path's business.

4. Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services, marketing and delivery services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.

Where your data is shared with third parties, we will seek to share the minimum amount necessary with your permission.

Where necessary, student personal information will be shared internally within and across other departments at English Path. Personal information is protected by English Path and may be shared with external parties, as required during studies.

5. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

6. Data Retention

We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as the law otherwise permits.

7. Your rights to the information we hold about you

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You have the right to see the personal data that we keep about you, by making a request in writing to us at compliance@globalbanking.ac.uk. You will not have to pay a fee to access your personal data (or to exercise any of other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made many requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

8. Student Responsibilities

Throughout the course of your studies, you have a responsibility to keep your personal details up to date. You can update your details by sending the email to compliance@globalbanking.ac.uk. During your time as a student, you may have access to other individuals' personal data and you are legally obliged to handle this in a confidential, professional and responsible manner in line with data protection legislation and any other codes of conduct or ethics.

If you are made aware of an individual's personal information then you are expected to keep this confidential and to not tell anyone without the individual's prior consent (unless there is an exceptional circumstance). You should also not seek to actively obtain another individual's personal information to which you are not entitled. In the instance where data protection legislation or a duty of confidence has been breached, disciplinary action will be considered.

9. Use of technology platform

The website uses Google Analytics technology which may collect non-personally-identifiable information relating to your use of the site. This may include: which pages you see; how long

you stay; what you click on our pages; if you visit the website again; which country and city you are browsing from; etc. This data is collected for monitoring and understanding the effectiveness of our websites. We also collect data relating to the demographics and interests of our users via Google Analytics and cookies set by Google advertising networks. This data is used in aggregated form to help improve the site and the University's marketing efforts. For further information on Google safeguards for personal data see: <https://policies.google.com/privacy>

10. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

11. 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.

12. Consent

By using our site, you consent to our websites privacy policy.

13. How to complain

English Path only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If, however if you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority. In the first instance, complaints should be directed to GBS Data Protection Office at compliance@globalbanking.ac.uk.

14. Contacting us

If there are any questions regarding this privacy policy please contact the Data Protection Officer by email at compliance@globalbanking.ac.uk or by post to Global Banking School, 153-159 Bow Road, London E3 2SE.

15. PHOTOGRAPHY & FILMING

All Courses & Online Courses

- We will not take photos or videos of you without your express permission. We will ask for this in advance and give due warning.
- Upon arrival you will be asked to give us consent to take photos and videos of you and use them for marketing purposes.

16. List of people with access to student records on CLASS and Sharepoint:

Admissions

Mike Summerfield
Roberta Cioffi
Kathleen Law
Nadia Aleo

Edgar Vallois
Lulu Chang
Sian Matos
Shadi Al Shomali
Hesna Düzgeç
Romina Borderas
Mary Wright
Tom Murphy
Holly Morgan
Dr. Amit Verma
Jamaica Estaura Cuizon
Syed Muhammad Asadullah
Ari Erdenetsogt

Finance

Nadia Klok