

PRIVACY POLICY

Edutuxia Limited

We take your privacy seriously. This Privacy Policy, including the contained website usage policy, explains how Edutuxia Limited ("we") collect, use and process your personal data, as well as ensure information about you is kept confidential. Any information you are asked to provide using this website will only be used in the ways described in this privacy policy.

Please read it carefully, as by using this website, or our services, you will be deemed to have read and accepted its terms.

This website privacy policy was last updated in June 2021.

INTRODUCTION

Edutuxia or eduinUK refers to Edutuxia Limited, a company incorporated and registered in England and Wales with company number 12558358 or any group subsidiaries.

Edutuxia respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how Edutuxia collects and processes your personal data through your use of this website, including any data you may provide through this website or contacting us through any other means.

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

It is important that you read this Privacy Policy together with any other Privacy Notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

WHO WE ARE

Edutuxia is the controller and responsible for your personal data. This means that we are responsible for, and control the processing of, your personal information.

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below.

CONTACT US

Edutuxia Limited, 20-22 Wenlock Road, London, England, N1 7GU

Telephone: (+44) (0)7547 223118

Email: edutuxia@gmail.com

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk), or another Data Protection Authority that may be competent in your case. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

INFORMING US OF CHANGES

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.

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 policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may process your data:

- to communicate with you regarding your applications or enquiries
- to enter into and perform a contract with you
- to contact you regarding our activities such as events and marketing our services
- to communicate with other organisations that may provide you with a service related to your intention and/or application of studying in the UK e.g. universities, student unions, financial institutions, airlines etc.
- based on our legitimate interest of fraud prevention, safety and security; error detection and rectification
- for analytics in terms of visitors' website use and their experience in order to improve the service.

Sometimes we may seek your consent or get in touch based on the contact email or contact number you left on our website, of which you can always opt-out by clicking a link in our correspondence or emailing us at edutuxia@gmail.com

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Information you give us.

This is information about you that you may give us by:

- a. filling in forms on any of our platforms;
- b. as part of using our services;
- c. by corresponding with us by phone, e-mail, online chat, at orientation sessions, educational fairs or otherwise;
- d. downloading an app and/or registering on one of our platforms;
- e. interacting with our platforms (for example, subscribing to any services, making an in-app purchase, searching for information or entering a competition);
- f. sharing information on social media from our platforms; or
- g. reporting a problem or concern with one of our platforms

The information you give us may include your name, address, telephone number(s), email addresses(s), date of birth, gender, country of birth, nationality, citizenship country, passport details, academic and English language attainments, disabilities, health information, including illnesses, allergies and dietary Information. Edutuxia may also collect information regarding payment of fees and your finances.

- Information we collect about you.

With regard to each of your visits to our site and/or any apps we provide we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information we receive from other sources: We may receive information about you if you use any of the other websites we operate or the other services we provide. We may also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them in relation to your expressed interest in our services and information required to enter into a contract with you such as creditworthiness.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

IF YOU FAIL TO PROVIDE PERSONAL DATA

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 perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel services you have with us but we will notify you if this is the case at the time.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. 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 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 a legal or regulatory obligation.
- To make applications to universities on your behalf or for matters related to your potential, ongoing or past applications
- To support your application to study in the UK by arranging for any services you may enquire or instruct us about e.g., educational loans, making domestic and international travel arrangements, etc.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Where your personal data will be used for marketing, you will be asked for your explicit consent.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us or on our behalf from other organisations if you have requested information from us or if you provided us with your details when you made an enquiry, entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside Edutuxia for marketing purposes.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. A cookie message will appear on our site before we store any cookie on your device.

Advertising and Remarketing Cookies – Edutuxia may use third party vendor re-marketing tracking cookies including the Google Adwords tracking cookie. These tell us when a user arrives on our site by clicking on one of our paid adverts. We may also use Google Adwords Remarketing to advertise our services across the internet. Remarketing will display relevant ads tailored to you based your prior use of our website, through cookies placed on your machine.

These cookies do not in any way identify you or give access to your computer or mobile device. These cookies allow us to tailor our marketing to better suit your needs and only display messages relevant to you.

You can opt out of Google's use of cookies via Google's Ads Settings: <http://www.google.com/settings/ads>

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

OUR LEGAL BASIS FOR PROCESSING DATA

Organisations that collect and use personal data must have a lawful basis for doing so under data protection law and we are required to let you know the lawful basis on which we rely to process your personal data. We rely upon the following lawful bases:

- Your consent to use your data for a particular purpose (for example to send you direct marketing by e-mail or to collect sensitive personal data);
- Where the use of the data is in our "legitimate interests" (see below for more information);
- Where we need to process your data in order to perform our obligations under a contract that we have entered into with you (for example to enrol you in an event or provide you with access to resources); and
- To process data where we are under a legal obligation to do so.

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and does not adversely impact the rights of the individual concerned. When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Our legitimate interests include:

- Promotion of our purposes, including to develop new offers and services (both independently and with our partners)
- Administration and operational management, including responding to solicited enquires, providing information that you have requested, research, events management, the administration of our resources and tools.
- Liaising with third parties, including working with partner organisations to develop new programmes and resources which further our purposes.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please get in touch with us using the details in the "Contact us" section above.

WHERE YOUR PERSONAL DATA IS STORED

Your personal data and documents are stored in electronic or paper form.

Your personal data in electronic form is stored in a password protected clients database application and/or the Edutuxia Limited's own computers, only accessible by Edutuxia staff.

Paper copies of contracts, invoices, receipts, hand written application forms etc are stored in a location accessible only by Edutuxia staff.

SHARING YOUR INFORMATION

We may share your personal information with any member of Edutuxia.

We may share your information with selected third parties including:

- a. business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- b. we may (with your consent, where appropriate) pass your details onto third parties including our partners to provide you with information and offers which may be of interest to you;
- c. advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience; and

- d. analytics and search engine providers that assist us in the improvement and optimisation of our platforms.

We may disclose your personal information to third parties:

- a. in the event that we transfer, sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and/or
- b. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or our safety and/or, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may allow our staff, consultants and/or external providers (data processors) acting on our behalf to access and use your information for the purposes for which you have provided to us (e.g. to analyse data and to process payments). We only provide them with the information they need to deliver the relevant service, and ensure that we take steps to ensure that they process personal data in a secure manner.

TRANSFERRING INFORMATION OUTSIDE YOUR COUNTRY

In addition to within the UK, we may transfer the personal information we collect about you to India.

To ensure that your personal information does receive an adequate level of protection wherever it is transferred within Edutuxia, we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with data protection regulations in the applicable jurisdiction.

DATA SECURITY

We have put 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 limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

INTELLECTUAL PROPERTY RIGHTS

We are the owner or the licensee of all intellectual property rights in our site, and in the material published on it. Those works are protected by copyright laws and treaties around the world. All such rights are reserved.

You may print off one copy, and may download extracts, of any page(s) from our site for your personal use and you may draw the attention of others within your organisation to content posted on our site.

You must not modify the paper or digital copies of any materials you have printed off or downloaded in any way, and you must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text.

Our status (and that of any identified contributors) as the authors of content on our site must always be acknowledged.

You must not use any part of the content on our site for commercial purposes without obtaining a licence to do so from us or our licensors.

If you print off, copy or download any part of our site in breach of these terms of use, your right to use our site will cease immediately and you must, at our option, return or destroy any copies of the materials you have made.

VIRUSES

We do not guarantee that our site will be secure or free from bugs or viruses.

You are responsible for configuring your information technology, computer programmes and platform in order to access our site. You should use your own virus protection software.

You must not misuse our site by knowingly introducing viruses, trojans, worms, logic bombs or other material which is malicious or technologically harmful. You must not attempt to gain unauthorised access to our site, the server on which our site is stored or any server, computer or database connected to our site. You must not attack our site via a denial-of-service attack or a distributed denial-of service attack.

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at edutuxia@gmail.com

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

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 a number of requests. In this case, we will notify you and keep you updated.

CHANGES TO THIS POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

CONTACT AND COMPLAINTS

Please contact us at edutuxia@gmail.com where you have a query about how we process your data or where you wish to exercise your rights listed in this policy.