



Data Protection Notice

PACE Language Institute Effective from 25th May 2018

PACE Language Institute takes privacy and the protection of our student, host family and staff data very seriously.

In this notice, we explain how we collect your personal information, how we use it and how you can interact with us about it. We try to keep this notice as concise as possible, but if you are unfamiliar with our terms, or would like more detail on any of the information here, please see our Data Protection Policy.

Who are we?

When we talk about “PACE”, or “us” or “we” in this notice, we are talking about PACE Language Institute.

Data Protection Officer

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled. You may contact our Data Protection Officer at dataprotection@paceinstitute.ie or by writing to: Data Protection Officer, PACE Language Institute, 29/30 Dublin Road. Bray, Co. Wicklow.

How we collect information about you

We collect personal information from you when for example you: register for an English language programme; apply for information on our products and services; apply to be a host family; apply to become a staff member or express an interest in one of our programmes. We also collect information through our website and social media. Our websites use ‘cookie’ technology. A cookie is a little piece of text that our server places on your device when you visit our website. They help us make the site work better for you. When you apply to us for products and services and during the time you avail of these, we may verify your identity. We may do this by sending and receiving information about you, to and from third parties including an educational agency.

How we keep your information safe

We use technical and organisational measures to protect your personal information from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal information. These security measures include encryption of your personal information, firewalls, intrusion detection systems, 24/7 physical protection of facilities where your personal information is stored and background checks for personnel that access physical facilities. When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

How long we keep your information for

How long we hold your information depends on the nature of the information and the purposes for which it is processed. We determine appropriate retention periods which meet our academic, legal and regulatory obligations. We hold your information while you are a student, staff member or host family and for a period of time after that. We do not hold it for longer than necessary. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the personal data will be deleted or anonymised (i.e. all identifying characteristics are removed).

Meeting our academic, legal and regulatory obligations

To meet our academic, regulatory and legal obligations, we collect some of your personal information, verify it, keep it up-to-date through regular checks, and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up-to-date, we may not be able to provide you with our products and services. To use your information lawfully, we rely on one or more of the following legal bases:

- your consent;
- performance of a contract;
- legal obligation;
- protecting the vital interests of you or others;
- public interest; and
- our legitimate interests or the legitimate interests of a third party (e.g. educational agent).

Consent

Sometimes we need your explicit consent to use your personal information. When we use sensitive personal information about you, such as health data, for example when you provide a medical certificate, we ask for your consent. Before you give your consent, we tell you what

information we collect and what we use it for. You can withdraw your consent at any time by contacting us by email at dataprotection@paceinstitute.ie.

How we use your information

We use information about you to:

- process and administer your academic programme registrations, provide end of course certification and host family placements to you;
- organise excursions and other events;
- collect your fees;
- process any payments to you;
- provide other operational supports;
- safeguard and promote the welfare of students, staff and host families;
- carry out surveys and statistical analysis;
- respond to your enquiries or complaints;
- provide reference requests subject to your consent;
- prevent unauthorised access to your information;
- meet our legal and regulatory obligations;
- establishing, exercising or defending legal claims; and
- ensure we provide you with the best service possible;
- identify ways we can improve our products and services to you.

To provide our products and services under the terms and conditions we agree between us, we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our products and services.

Your information and third parties

Sometimes we share your information with trusted third parties. For example with:

- educational agents;
- host families;
- service providers (e.g. transport partners, auditors, legal advisors and other professional advisors);

- educational partners (e.g. exam centres; QQI/ACELS; MEI);
- other legal and regulatory bodies (e.g. IALC);
- Information and Communications Technology (ICT) and information security providers.

We may also share information with third parties to meet any applicable law, regulation or lawful request, including with law enforcement agencies, which may be either in or outside Ireland or to deal with any claim or dispute that may arise. We expect these third parties to have the same levels of information protection that we have.

Your personal information rights

When your personal information is handled by PACE in relation to a product or service, you are entitled to rely on a number of rights. These rights allow you to exercise control over the way in which your personal information is processed.

For example, we may help you in:

Accessing your personal information: You can ask us for a copy of the personal information we hold about you.

Correcting and updating your personal information: If you believe that any personal information we hold about you is inaccurate or out of date, you can look for the information to be corrected at any time.

Withdrawing consent: You can change your mind wherever you give us your consent, such as for direct marketing, or using your sensitive information, such as medical or biometric data.

Restricting and objecting: You may have the right to restrict or object to us using your personal information or using automated decision making.

Deleting your information (your right to be forgotten). You may ask us to delete your personal information. This may be refused in certain cases if the information is still required for the provision of products or services or completion of a contract.

Moving your information in electronic form (your right to Portability). You may request (in certain cases) that your personal information is transferred to you or another organisation in digital form.

How to exercise your rights

You may execute any of these rights free of charge. You may do so by contacting us:

Phone: + 353 1 2760922 Email: dataprotection@paceinstitute.ie

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information. Once we are satisfied that we have effectively verified your

identity, we will respond to the majority of requests without undue delay and within a one month period (i.e. 30 calendar days) of receipt of the request. We will action your request to have your personal information corrected within 10 calendar days. These periods may be extended in exceptional circumstances and we will inform you where the extended period applies to you along with an explanation of the reasons for the extension.

International transfers of data

We sometimes need to share your information with organisations which are located or who undertake processing outside the European Economic Area (EEA) to help us provide you with our products and services. Some educational programmes/partners, for example, are provided/located outside the EEA. This may mean that some personal information may be processed in countries such as Brazil, Japan or the United States. We expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected and we will only transfer in line with industry best practice.

Making a complaint

If you have a complaint about the use of your personal information, please let a member of staff know, giving them the opportunity to correct things as quickly as possible. If you wish to make a complaint you may do so in writing and by email at dataprotection@paceinstitute.ie

Please be assured that all complaints received will be fully investigated. We ask that you supply as much information as possible to help our staff resolve your complaint quickly. You may also contact the Data Protection Commission in Ireland to lodge a complaint (details below).

Data Protection Commission

Canal House, Station Road,

Portarlinton, Co. Laois, R32 AP23

Phone: + 353 57 868 4800 / + 353 761 104 800 **Fax:** + 353 57 868 4757

Web: www.dataprotection.ie **Email:** info@dataprotection.ie

Updates to this notice

We keep this notice under regular review and will make changes from time-to-time, particularly when we change how we use your information, and change our technology and products or services. We will inform you of material changes to the contents of this Data Protection Notice, through a notification posted on our website or through other communication channels. You may find an up-to-date version of this notice on our website.