

## LSI Independent College, LSI Education, and HLI Data Protection Policy

### 1. Purpose and Scope

The policy is designed to ensure LSI complies with the General Data Protection Regulation. It is a dynamic document which is to be regularly reviewed and updated. This is to be done annually. LSI is required to process personal information regarding:

- employees, volunteers, and applicants.
- host families, when applicable.
- students/clients.
- parents of students/clients aged under 18.
- Educational Tour Operators (ETOs), when applicable

In doing so, LSI shall at all times comply with the Data Protection Act 1998 and the General Data and Protection Regulation (GDPR) EU/2016/679. The GDPR is considered to be the gold standard of Data Protection Regulation and shall therefore be applied to all LSI schools and offices. In addition, any individual living in the EU using LSI services and having their personal data processed by LSI, regardless of the location of those services and processing, is protected by the GDPR. In all cases, when National or State laws, including Visa and Immigration regulations differ from the GDPR, the former shall take precedence.

### 2. Data Protection Officer

LSI Deputy Managing Director Roy Immanuel has been appointed as LSI's Data Protection Officer (DPO). It is his responsibility to ensure that this policy and attendant procedures are adhered to at all times. At every LSI school, including LSI Independent College, the "data champion" is the school director or principal, unless otherwise stated.

### 3. Definitions:

#### a. Personal Data

The definition of Personal Data is broad. Illustrative examples include:

- Names
- Addresses
- Passport and visa information
- Telephone numbers
- Medical information
- Opinions about other people
- Financial information

#### b. Data Processing

The definition of data processing is broad. Illustrative examples include:

- Obtaining, recording, viewing, holding or carrying out any operation on Personal Data.
- Organising, altering, drawing reports from Personal Data.
- Searching, retrieving, and disclosing Personal Data

c. Data Subject

The data subject is the individual whose personal data is being processed by LSI

4. General Principles of Personal Data Processing

As far as is reasonably practicable, LSI will comply with the General Data Principles by ensuring that all personal data will be:

a. Lawful, transparent and fair Data must only be processed for legal and fair purposes and the processing must be necessary to achieve the purpose for which it has been collected.

Examples include:

- Exam entries
- Enrolment on courses
- Having emergency contact information available to staff
- Safer Recruitment

LSI must be transparent in detailing the full extent and processing purposes of Personal Data. Details must be provided in an intelligible, accessible way and use clear and plain language which can be understood by the Data Subject. This should be provided in a Privacy Statement which must include:

- The identity and contact details of LSI.
- The purpose and legal basis for the data processing
- Who will receive the data and with whom it may be shared.
- The subject's right to access, correct, erase, move or update erroneous data.
- The right to object to the processing of the data.
- Details of safeguards and control applied in transmitting data, in particular when moving to other countries.

b. Restricted to a specific purpose

LSI can only process data for the specific, legitimate purposes for which it was originally collected. Should the processing purpose change from the original intent, LSI will seek the explicit, active consent from the Data Subject.

c. Relevant and Limited

Before processing can begin, it must be confirmed that it is necessary in order to achieve the purpose. This is to be checked on an ongoing basis and annually as a minimum as part of a comprehensive Data Processing review.

d. Accurate and up-to-date

LSI shall take all reasonable steps to ensure that incorrect details are corrected or erased and replaced as soon as is practicable, and within one month of notification.

e. Kept for no longer than necessary

Personal Data which can identify individuals will only be kept as long as is necessary for the completion of the original purpose for which it was collected. This would not necessarily coincide with the end of the course, as academic, attendance, proficiency records et cetera may be required by either LSI or the Data Subject after the end of the course.

f. Kept secure and confidential.

All personal data will be protected against illegal and unauthorised processing, sharing or accidental loss, damage and destruction using technical and physical security measures as appropriate. It should not be passed on or shared with third parties without good reason and within the parameters of the Privacy Notice as outlined in 4b.

## 5. Lawful processing

Collecting and processing of data by LSI is only permitted when it satisfies one of the legal conditions as set out below:

a. To carry out a contract such as but not limited to:

- i. Course registrations
- ii. Exam entries, both internal and with third parties
- iii. UCAS applications
- iv. Employment
- v. Accommodation provision.

b. Consent

i. For data to be processed the Data Subject must provide their express consent. This must be:

1. Freely and actively given
  2. Specific, clear and an informed decision, based on information given in the Privacy Statement. It must be distinguishable from other terms and conditions and consents.
- ii. Consent may be withdrawn at any time when requested in writing.
- iii. A record of when and how consent was given must be kept.

c. Legal obligation

i. Personal data may be processed as part of a national or state statutory requirement, including for visa and immigration purposes.

d. Sensitive data

i. Where LSI has a duty or care or in order to comply with its equality policy, it may need to process Sensitive Personal Data

## 6. The Rights of the Data Subject

a. Access to information

The subject has the right to request whether their personal information is being processed by LSI and if so, to request the details of that processing and a copy of all information in an accessible and understandable format.

b. Correct information.

The subject has the right to have any erroneous data corrected or removed as soon as is practicable and within one month. In order for a request to be processed, the data subject must provide identification in line with the Safer Recruitment Policy.

c. Right to be forgotten

The subject has the right to request that all personal data relating to them is deleted where it is no longer needed for the purposes for which it was originally needed. d. Right to prevent processing The subject can request that LSI stop processing personal data where the data subjects' interests override those of LSI. This does not apply when LSI has legitimate reasons to process the data, such as National and State regulations, or for Visa and Immigration purposes.

7. Under 18s

a. Consent

Where client/students are aged under 18, LSI shall only process data when express consent has been given by the Parent/Guardian\*

\*This applies by default to LSI Independent College. For other LSI schools, 16-17 yr old students may have their data processed without communication from any other persons if the student has booked independently – this is subject to local and national guidelines.

b. LSI shall process Personal Data of the Parent/Guardians of students/clients aged U18 in order to carry out its Safeguarding duties as per the Safeguarding Policy.

8. Right of refusal

a. LSI may refuse to provide services to clients/students/ETOs where the refusal of data processing consent may lead to LSI being unable to enforce its Safeguarding, Attendance, Behaviour and Disciplinary Policies or to provide the client/student with the product or service they wish to book.

9. Transfer of data between LSI companies

LSI language schools, LSI Independent College, and HLI have the same ownership and shared marketing/administrative channels. Therefore, all data gathered by one school or division may be shared freely within the group, subject to the terms outlined above.

10. Duration of data storage

As stated in the LSI Privacy Policy (see link below) all data collected by LSI schools will be deleted after seven years. This includes all information stored on our databases in digital and print format, as well as email logs. There may be financial information that is required to be kept for longer, in which case this data will be anonymised. Email correspondence of LSI senior managers may also be archived for longer than seven years, as required.

## 11. Newsletters and correspondence

We will endeavour to correspond only with people who still actively want to be contacted. As well as offering in every mail for students/partners to unsubscribe, we will regularly sweep our correspondence lists for those addresses that serially decline to open our mail.

## 12. Other LSI data policies:

LSI Privacy Policy: <https://www.lsi.edu/privacy>  
[https://www.lsi.edu/documents/LSI\\_Student\\_Privacy\\_Statement.pdf](https://www.lsi.edu/documents/LSI_Student_Privacy_Statement.pdf)  
LSI Cookie Policy: <https://www.lsi.edu/en/cookies.php>

## 13. Jurisdiction

This policy is based on UK & EU GDPR laws. However, LSI schools will always abide by the local and federal laws of the countries in which they operate. In any regions where the local data protection laws contradict this policy document, LSI schools will defer to local guidelines.

## 14. Updates

This policy has been updated by Roy Immanuel as of March 2024

To be reviewed in March 2025