

# **Data Privacy Policy & GDPR**

LT Education Abroad Limited. ("LT Education Abroad Limited.", "English Language Schools", "we", "us" or "our") provides users with the ability to investigate the process of becoming a student in certain schools around the world, including information about visa applications. and program information. We also provide the ability to apply for admission to certain programs of such institutions through our recruiting partners, counsellors, and our website and to access ancillary services and products related to the international student travel (collectively, the "Services").

To do this, LT Education Abroad Limited collects your personal data. This Privacy Policy sets out how LT Education Abroad Limited. collects, uses, discloses, and manages personal data. Changes made to this Privacy Policy will take effect on the date indicated above and your continued use of the services and / or the LT Education Abroad Limited website. after this date you will be subject to our updated Privacy Policy.

#### General

In this privacy and cookie policy, we describe:

- The information we collect and process about you (that you provide to us directly or are provided to us by third parties, such as our recruiting partners and consultants).
- The purposes for which we collect and process information about you.
- The basis on which we collect and process information about you, when you use this website located at https://elischools.com/ (our "Website") and the services available through this website, provided to our registered users (collectively, our "Services").

In this Policy, the term "personal data" or "personal information" means personal data or data that relates to an identified or identifiable person. We recommend that you read this Policy carefully to understand what LT Education Abroad Limited. and its affiliates and / or subsidiaries do with your personal data. Your use of our website and services, and any dispute over privacy, is subject to this Policy and any of our applicable Terms and Conditions for the use of our Services, including its applicable limitations on damages and dispute resolution. Our terms and conditions for our services are incorporated by reference into this policy. By visiting our website, you accept the practices described in this policy.

#### What we collect and how

## How does LT Education Abroad Limited my personal information?

We collect personal data directly from you, about you from third parties, such as our marketing affiliates and service providers that are used to verify your identity and prevent fraudulent activities, other users of LT Education Abroad Limited and other clients of LT Education Abroad Limited or clients for the purpose of providing you with LT Education Abroad Limited Services or as part of a client referral program, and automatically as you use our website and services. At this time, use of our Services is only available to users who register for our Services.

We receive personal data about you from third parties, such as bank references, credit reporting agencies, affiliates, other LT Education Abroad Limited users, event providers, and other third parties (for example, entities that help us validate your identity, for purposes of risk assessment, fraud prevention, etc.).

We may combine this information with other information that we collect about you. We, and our third-party service providers, automatically collect the following information about your use of our website and our Online Services through cookies, web beacons, log files, and other technologies (subject to your consent where required by the applicable law): your domain name, your browser type and operating system, the web pages you view, the links you click, your IP address, the amount of time you visit our website or use our services, your activities on our website and the referring URL or the web page that led you to our website. Please see the "Our use of cookies and other tracking mechanisms" section below for more information.

# What personal data does LT Education Abroad Limited collect?

The types of personal data we collect about you depend on your particular interaction with our website and our services, and generally include, where permitted by applicable law:

Categories of personal data collected	Specific personal data	Source of personal data
Identifiers	Name, email address, telephone number, postal or billing address, IP address, date of birth, national identification numbers, and documents that may include your photograph and / or government identification.	Directly from you, third parties on your behalf and at your instructions, other users and customers of LT Education Abroad Limited., Our service providers and affiliates.
Financial information	Bank and credit account information, credit history as applicable, details of any transactions made using any of the Services.	Directly from you, third parties on your behalf and at your direction, recruiting partners, counsellors, other users and clients of LT Education Abroad Limited., Our service providers and affiliates.
Internet or other similar network activity	Other information collected through cookies and other tracking technologies listed above and described in the section below titled "Our use of cookies and other tracking mechanisms"	From you directly and from our third-party analytics tools and use of cookies (see the section below titled "Our use of cookies and other tracking mechanisms").

Geolocation data	Geolocation	Directly from you and / or [through your use of the Mobile Application] and / or our third-party analytics tools and the use of cookies (see the section below titled "Our use of cookies and other tracking mechanisms").
Professional or employment information	Name and contact information, credentials and professional skills, educational and employment history, salary, evaluations, references, interviews, certifications, disciplinary matters, and other information of the type included in a resume, resume, or cover letter.	Directly from you or when provided to us by another party, such as a recruiter, advisor, or external website.
Other categories	Any other information that you choose to provide to us (for example, when you send us an email or contact us).	Directly from you, from third parties on your behalf and according to your instructions or permission.

# When we collect your information and how we use it

LT Education Abroad Limited. collects your personal data each time you perform any of the following actions and uses it as described:

You do not need to create an account to visit and explore certain features of our website, such as browsing various schools and programs, reading other parts of the website content, or determining your eligibility for certain programs. If you choose to use our website to discover programs for which you are eligible to apply, we collect personal data such as your nationality, country of education, higher education, grading scheme, grade point average, English test score (s) and the disciplines or programs that you are interested in pursuing. LT Education Abroad Limited uses this information to create a list of programs and schools to which you can apply.

Create a student profile and / or apply to an educational program: To apply to an educational program, you (or the recruiting partner or advisor who acts as your legal representative) must create a student profile on our website or application form. The personal data that we collect from your student profile helps us match you with the schools and programs that match your preferences and language level. This information may also be required by the school to process your request. This information may include your first and last name, email address, gender, date of birth, home address and postal address, passport details, marital status, emergency contact information, English language test score (s), educational preferences. (as preferred study destination and educational fields of interest), educational history, volunteer experience and other educational information. During the application process, you have the option of providing additional information, such as documentation of awards and school projects. This information is not required to process your application but is recommended to improve the success of your application. We may use your

profile information and other information about your use of the website (such as search queries or other links that you click) to provide you with personalized school recommendations through the website.

**Use an email account:** to facilitate your communications with certain schools of interest. Email accounts are only used to apply for educational programs through LT Education Abroad Limited. LT Education Abroad Limited.

**Use an email account:** to facilitate your communications with certain schools of interest. Email accounts are only used to apply for educational programs through LT Education Abroad Limited. LT Education Abroad Limited. Use DocuSign service for document verification - You may have the option to use is an online solution that enables efficient and secure document verification. The document validation platform is designed to help partners and institutions review documents from a single source for a variety of uses, from simplifying study requests to validating student feasibility for educational programs. If you use you are also subject to the applicable terms and conditions of the program as well as this Privacy Policy.

You have the ability to post information (for example, questions, comments and opinions) through the services of LT Education Abroad Limited or on social media platforms, such as Facebook, LinkedIn or Instagram, as well as send us direct messages through these platforms. Please note that any personal data that you voluntarily post in any public forum will be available to others and you should exercise caution when posting any personal data. Content that you post on sites owned by third parties (such as social media platforms) is subject to the privacy policies of those third parties.

**Contact Us:** When you contact us with a comment, question, or complaint, you may be asked for information that identifies you (such as your name, address, and a phone number) along with additional information that we need to help us respond quickly to your question or respond to your comment or complaint. We may also retain this information to assist you in the future and to improve our customer service, products, service offerings, events, and promotions.

**Payment Processing and Transaction Tracking:** LT Education Abroad Limited. uses, with your consent, external providers of PCI certified payment services, including but not limited to Western Union, Flywire or Stripe. When you make a payment directly using these payment service providers, you are subject to their privacy policies. They are independent of LT Education Abroad Limited. and LT Education Abroad Limited is not responsible for their privacy practices.

Our applications are designed to directly connect our users in a secure, transparent, and cryptographic way to the PCI certified payment processor. This helps to ensure that we maintain the privacy of your financial transactions. Payment processor provides LT Education Abroad Limited. a transaction number and a status.

This information is often required for visa applications as proof of program payment, as well as a demonstration of the student's commitment to the selected program. LT Education Abroad Limited. maintains a list of payment processors that we may use to process payments to independent service providers and / or third-party contractors in connection with the Services.

**Sign up for marketing emails and other communications:** We may offer you the ability to sign up to receive marketing and promotional communications from LT Education Abroad Limited. through the website, on third-party websites (including through social media sites) or educational events and information sessions. In these circumstances, we collect certain personal data (such as first and last name, email address or mobile phone number) that we use to send you emails and other communications containing updates from LT Education Abroad Limited, suggestions and other content that may be of your interest. You can opt out of receiving promotional emails from us by following the "opt-out" or "unsubscribe" instructions provided in your email or text message, or by contacting us as set out below. Please note that you may continue to

receive messages from us regarding your application or other transactional and account-related electronic messages.

**Participate in our customer surveys and research:** From time to time, we may offer you the opportunity to participate in one of our surveys or other customer research. The information obtained through our surveys and customer research is used in an aggregated, non-personally identifiable format. We use this information to help us understand our customers and improve our product and service offers, promotions and events.

**Register for Contests and Promotions:** When you enter a contest or promotion, we may collect your name, address, phone number, email address, and other information that you provide. We use this information to manage your participation in the contest or promotion. If non-identifiable data is used for research purposes, then the limitation of liability and compensation clauses, if any of those contained in the Terms and Conditions, are waived with respect to damages suffered or liabilities incurred as a result of any activity research.

**Apply for a job at LT Education Abroad Limited:** In connection with a job application or inquiry regarding possible employment with LT Education Abroad Limited, you may provide us with certain personal data about yourself (such as that contained in a resume, a cover letter or similar job related to education). materials). We use this information in order to process and respond to your request for current and future career opportunities.

**Apply to become a recruiting partner of LT Education Abroad Limited:** In connection with the application to become a potential recruitment partner of LT Education Abroad Limited., you may provide us with certain personal data such as your first name, last name, address, email address, personal data about your education and employment. background and bank details. We use this information for the purpose of processing and responding to your request to become a Recruitment Partner of LT Education Abroad Limited. and to pay you as needed using third party payment processors.

**Apply to become a LT Education Abroad Limited advisor:** In connection with applying to become a potential LT Education Abroad Limited advisor, you may provide us with certain personal information such as your first name, last name, address name, email address, personal information about your education and employment history and bank details. We use this information for the purpose of processing and responding to your application to become an LT Education Abroad Limited Advisor. and to pay you as needed using third party payment processors.

You are responsible for providing accurate and up-to-date information.

#### When do we share your information?

We share your personal data with third parties, including service providers, regulated institutions (for example, Government agencies or financial institutions), affiliated entities, and business partners as set out in the table below.

In the next section, we also list the reasons we share information.

Who we share your personal data with	Reason
Government Agencies and Regulatory Bodies	We may share your personal information with Government agencies, regulatory bodies, and industry organisations for the purpose of meeting regulatory guidelines and requirements and the monitoring of the service delivery of LT Education Abroad Limited. These institutions will only use your data for the purpose of assessing LT Education Aboard Limited and do not have permission to share your data with any third party or to disclose your date for marketing or other purposes.
Partners	From time to time, we may partner with third parties to provide benefits to registered members of the website. We may provide certain personal data to third parties so that they can contact you with benefit information and / or we may share non-identifiable aggregated profile and usage data with external partners for marketing and analytics purposes. Audiences to deliver ads to our subscribers on Facebook. Your personal information is not shared with Facebook; Your email address becomes a unique number that is combined with another unique number to identify you within Facebook. You can opt out of receiving Facebook audience ads.
Service Providers	We may transfer (or make available) your personal data to third parties who provide services on our behalf. For example, we may use service providers as cloud providers to send our emails, host the website and data (including cloud providers), and operate some of their functions. Other service providers can assist us with the provision of services, help us verify your identity, prevent, detect, and protect against fraudulent activities or abuse of our services, conduct internal investigations and analytical evaluations, process your transactions, maintain your account (s). (s) and provide you with customer service. These service providers include Internet service providers, cyber and data security services, banks, financial institutions, payment processors, financial service providers, remote access services, service providers that help us verify your identity, and we help meet our legal and regulatory obligations, and our business, legal, tax, financial and other advisers, confidentially. Your personal data may be held and processed by third-party service providers in the US or other jurisdictions. Our service providers receive the information they need to perform their designated functions, and we do not authorize them to use or disclose personal data for their own marketing or other purposes.
Parties and persons involved in a business transaction with LT Education Abroad Limited.	We may transfer any information we hold about you as an asset in connection with a proposed or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of LT Education Abroad Limited. or as part of a corporate reorganization or other change. in corporate control.
Researchers	With your consent, LT Education Abroad Limited. uses your data internally for research and development to improve our existing products and services and / or create new features to better serve you. LT Education Abroad Limited. also uses non-personal data ("Metadata") for the same purpose. With your consent, we may share your personal data with third parties involved in research and development to improve our existing

products and services and / or create new features to better serve you. Such third parties may include educational, academic, and other institutions in similar fields.

# Lawyers, Courts, and Law Enforcement

LT Education Abroad Limited and our service providers in Ireland, Canada, USA and others may provide your personal data in response to a search warrant or other legally valid inquiry or order, or to an organization in the event of a breach of an agreement or violation of the law, in another way, required or permitted by Irish, Canadian, US or other applicable laws. We may also disclose personal data when necessary for the establishment, exercise or defense of legal claims, to detect, suppress or prevent fraud, and to investigate or prevent actual or suspected loss or damage to persons or property. When you have engaged a recruiting partner or advisor to submit your application to LT Education Abroad Limited., We may be required, for legal, regulatory and / or compliance purposes, to contact you directly to confirm certain information. provided in connection with your application process.

If you do not want us to use your personal data to market it to you and / or pass it on to third parties for marketing purposes, please contact us through the various communication channels available below. You may also unsubscribe from any marketing emails sent to you by LT Education Abroad Limited using a link provided in such emails. We do not sell your personal data.

#### Where we store your data

All information you provide is stored on our secure servers. All transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password that allows you to access certain parts of our site, you are responsible for maintaining the confidentiality of this password. We ask that you do not share a password with anyone.

Our servers are located mainly in Spain. Many of our service providers are also located outside of Spain. While we use appropriate security measures to keep your information safe, laws elsewhere may differ from those in Spain and authorities in those jurisdictions may access your information in accordance with their local laws.

#### **Safeguards**

LT Education Abroad Limited. takes the protection of your information very seriously. We have implemented reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of personal data in our custody and control, including limiting access to our database to legitimate users and employment. device encryption and version tracking.

Unfortunately, the transmission of information over the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

#### Your rights

You have the following rights:

- Access
- Correction (right to rectification)
- The right to withdraw your consent / be forgotten
- The right to report or complain.

You can access, update and correct inaccuracies in your personal data in our custody or control at any time, subject to limited exceptions prescribed by law. Simply log into your account, go to your account profile, and make any necessary changes.

You can also request access, corrections, or updates to other personal data in our records by contacting us as set out below. We may request certain personal data in order to verify the identity of the person seeking to access your personal data records.

You can request that your data be withdrawn (forgotten); this type of request can be made assuming LT Education Abroad Limited. you are in a legal position to comply with such request. You should not have an active study request where financial or billing records are or may be in process in the event that a request is contracted for a third-party service. Yes, LT Education Abroad Limited. can fulfil your request, only the personal data you provided will be forgotten. Non-personal data ("Metadata") will be maintained independently.

If you would like to raise a concern or complaint with LT Education Abroad Limited, please contact us as indicated below. We will respond to your concerns in a reasonable amount of time, usually within 15 business days.

## Third party analysis

LT Education Abroad Limited. uses the web analytics services of Google Analytics, Hubspot, Walkme, Hellobar, Amplitude, Mixpanel, Facebook Pixel and Freshpaint to collect standard information from Internet logs. Tools like these may use cookies to help us analyze how visitors use the website. For example, with Google Analytics, the information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by a Google server. Google uses this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing website operators with other services related to website activity and use of Internet. You can prevent the storage of data related to your use of the website and created through the cookie (including your IP address) by Google, https://tools.google.com/dlpage/gaoptout?hl=en.

You can also obtain additional information on Google Analytics data collection and processing and data privacy and security at the following links: https://policies.google.com/technologies/partner-sites and https://support.google.com/analytics/topic/2919631.

#### **Data retention**

LT Education Abroad Limited. will only retain your personal data for as long as it is necessary to fulfill the purpose for which it was collected or as permitted or required by law or contract (which may extend beyond the termination of our relationship with you).

Generally, personal data is kept for as long as you participate in the institutional program for which you applied or up to one year after we last contacted you. We may retain certain data as necessary to:

- Legitimate business purposes, such as audits, account recovery;
- If required by federal, state, provincial or other laws;
- To prevent future fraud or abuse, or
- By contract with a partner and / or institution.

All personal data withheld is treated in accordance with this Privacy Policy.

If you request that your personal data be removed from our databases and / or systems, it may not be possible to completely remove all of your personal data due to technological and legal limitations. However, we will take reasonable steps to securely destroy the information or to ensure that the information is anonymous and / or anonymous as necessary.

If you request additional services from LT Education Abroad Limited. that are subject to this Privacy Policy, you will be authorizing the extent of data collection and / or the purpose of processing as a result.

Documents from https://crm.elischools.com/ will be kept for as long as they are necessary for their intended purpose, or as required by law or contract (which may extend beyond the termination of our relationship with you).

The entity, student or institutional partner who has uploaded the document (s) for verification may request the premature deletion of the uploaded files. This is more likely to occur in the event that a content correction or update is required.

#### Changes to our privacy policy

This policy may change from time to time. Any future changes will be posted on our website and, where applicable, we will notify you by email or via our website.

We strongly recommend that you check back frequently for any updates or changes to our Policy. We will not materially reduce your rights under this Policy without taking steps to bring such changes to your attention.

#### Contact us, questions, update your information, opt-out.

If you are a client of LT Education Abroad Limited. Services and you want to update your personal data, please contact us through the contact information below. If you are not a customer of LT Education Abroad Limited. Services, but you have provided us with personal data or if your personal data was provided to us by third parties and you want to update your personal data, you can contact us via phone number or email address. listed below. From time to time, we may email you or send you special offers; You can opt out of receiving those offers by using a link provided in the email or by contacting us as indicated below.

#### Contact our Data Privacy Officer if:

- You have any questions or comments about this Privacy Policy.
- You want to access, update and / or correct inaccuracies in your personal data and you cannot do it yourself, or
- Otherwise, you have a question or complaint about the way we or our service providers treat your personal data.

You can contact our Data Privacy Officer by email at hello@elischools.com or by mail at the following address:

LT Education Abroad Limited.
7 Herbert Place, Grand Canal Dock, Dublin Dublin, Dublin D02 EH93, Ireland Ireland

Phone: (01) 559 8717

#### **Appendix 1: Additional Terms for EEA and UK Customers**

The following information is required in accordance with EEA law regarding privacy and data protection. The terms below apply to our EEA and UK customers and website visitors, in addition to the terms of the rest of the Policy.

For the purposes of the General Data Protection Regulation ("GDPR"), the data controller is LT Education Abroad Limited, 7 Herbert Place, Grand Canal Docks Dublin 2, Dublin D02 EH93 Ireland. If you have any questions about this Policy, please contact our Data Protection Officer (DPO) at hello@elischools.com

If you are not satisfied with the way we process your data or how we have responded to a request or complaint, you have the right to lodge a complaint with the local supervisory authority.

#### When Do We Share Your Personal Data?

The table titled "How and why we share your information" in the main part of the Policy under the heading "WHEN WE SHARE YOUR INFORMATION" lists with whom we may share your information, including transfers for legal compliance reasons and need in order to provide you, our services.

You should be aware that when you share your information, it may be transferred to and stored at a destination outside of the EEA or the UK, as appropriate.

Please note that when data is transferred outside of the EEA, non-EEA countries may not offer the same level of protection for personal data as is available in the EEA. LT Education Abroad Limited. will take several steps to ensure that your data is treated securely, which may include, but is not limited to:

- Evaluate the security measures taken anywhere your personal data is transferred.
- Have adequate contractual terms that oblige the data processor to process only in accordance with our instructions.
- Have monitoring, notification, and resolution procedures with respect to ongoing security; and
- Transferring your data only through adequate protection as described in article 46 of the RGPD, including the standard contractual clauses adopted by the European Commission (article 46.2)

Please contact us hello@elischools.com. if you need more detailed information on international transfers of your personal data and the particular guarantees used.

# Legal Bases for The Processing of Your Personal Data

We process your personal data based on the following legal, recognized bases and in accordance with the applicable data protection laws:

- The processing is necessary to perform our contract with you (that is, the Terms and Conditions that apply
  with respect to the Services of LT Education Abroad Limited., For the provision of our Services), or to take
  the steps requested by you before to enter into said contract;
- You are obliged to provide us with personal data as it is necessary to enter into and execute our
  contractual agreements. In the event that you do not wish to provide us with your personal data for the
  purposes described above in the section "How and why we use your information", we will not be able to
  fulfill our contractual agreement with you;
- Processing is in the legitimate interests of LT Education Abroad Limited. or of another person, and these
  interests are not overridden by your interests or rights in the protection of your personal data. This may
  include the processing of your data for the prevention of fraudulent activities, internal investigations and
  analytical evaluations, in order to communicate with you and inform you about new products and services
  that we offer or to promote new products and services from other parties that we believe that. may be of
  interest to you, etc.;
- Before processing your personal data to pursue our legitimate interests for the purposes described
  above in the "How and why we use your information" section, we determine whether such processing is
  necessary and carefully consider the impact of our processing activities on your fundamental rights. and
  freedoms. In summary, we have determined that such processing is necessary for our legitimate interests
  and that the processing we carry out does not have an adverse impact on these rights and freedoms.
- You have given your consent for the processing of your data;
- The processing is necessary to comply with a legal obligation that applies to LT Education Abroad Limited.

Sometimes we process data about you that the law considers to fall into special categories (see the section "What data do we process about you?" For more details), in which case we use one of the following reasons:

- The processing is necessary for the establishment, exercise or defense of legal claims;
- You have freely given your informed and specific consent for processing; or
- Processing is necessary for reasons of substantial public interest, in accordance with applicable law.

If you would like more information on the legal grounds used to process your information, or on the legitimate interests mentioned above, please contact us.

In cases where we have requested and you have given your consent for us to process your personal data, you have the right to withdraw such consent at any time. You can do so by contacting our DPO at hello@elischools.com

#### Do You Have to Give Us Your Personal Information?

In most cases, providing us with your personal data is optional; however, if you do not provide them, you will not be able to use our Services. For example, we need details such as your name, address, and bank account details so that we can make payments to you and receive payments from you. In other cases, you can choose whether we collect your personal data, for example, you can disable cookies in your browser and we will not

place any cookies on your device or computer (although in this case you may not be able to do so). use all parts of our website).

# **Profiling And Automated Decision Making**

We use automated decision making as part of the LT Education Abroad Limited Services. We use these tools as a fraud prevention measure and for the purpose of assessing the security and risks related to the performance of the LT Education Abroad Services. Limited.:

- 1. Automated tools built into our application approval process Based on the information you provided; the tool may advise if additional information is required to approve your application.
- 2. Automated tools built into our approval process for certain schools or programs: Such tools can inform if additional information is required for eligibility purposes or to determine eligibility.

#### How Long Do We Keep Your Personal Data?

LT Education Abroad Limited. will only retain your personal data for as long as it is necessary to fulfill the purpose for which it was collected or as permitted or required by law or contract (which may extend beyond the termination of our relationship with you).

Generally, personal data is kept for as long as you participate in the institutional program for which you applied or up to one year after we last contacted you. We may retain certain data as necessary to:

- Legitimate business purposes, such as audits, account recovery;
- If required by federal, state, provincial or other laws;
- To prevent future fraud or abuse, or
- By contract with a partner and / or institution.

All personal data withheld is treated in accordance with this Privacy Policy.

If you request that your personal data, be removed from our databases and / or systems, it may not be possible to completely remove all of your personal data due to technological and legal limitations. However, we will take reasonable steps to securely destroy the information or to ensure that the information is anonymous and / or anonymous as necessary.

If you request additional services from LT Education Abroad Limited. that are subject to this Privacy Policy, you will be authorizing the extent of data collection and / or the purpose of processing as a result.

Documents from http://cmr.elischools.com will be retained for as long as they are necessary for their intended purpose, or as required by law or contract (which may extend beyond the termination of our relationship with you).

The entity, student or institutional partner who has uploaded the document (s) for verification may request the premature deletion of the uploaded files. This is more likely to occur in the event that a content correction or update is required.

# Policy on your rights in relation to your data

You have various rights in relation to your personal data which are described in more detail below. You can exercise your rights at any time by contacting us at hello@elischools.com

#### Accessing your data

You can ask us to:

- Please confirm if we are processing your personal data.
- Give you a copy of that personal data.
- Provide you with other information about your personal data, such as what data we hold, what we use
  it for, to whom we disclose it, whether we transfer it outside the EEA and how we protect it, how long
  we keep it, what rights you have, how you can make a complaint, where we obtained your data and if
  we carry out any automated decision-making or profiling. Our goal is to provide you with all this
  information in this Policy, although if

Something is unclear, please contact our Data Protection Officer at hello@elischools.com You do not have to pay a fee for a copy of your personal data unless your request is unfounded, repetitive or excessive, in which case we will charge you a fee. reasonable amount in the circumstances. We will inform you of any charges before completing your application.

#### **Correction of your personal data**

You can ask us to correct any personal data that is inaccurate or incomplete (in most cases, you can make these changes yourself by logging into your account). This is free.

If we have shared the personal data with another person, we will inform you of the correction whenever possible.

If we are unable to process a request to correct your personal data, we will let you know and explain why.

#### Delete your personal data:

This right is sometimes called the "right to be forgotten". This is not an absolute right, but you have the right to have your data erased, free of charge, under certain circumstances.

You can request that your personal data be erased when:

- It is no longer necessary for the purpose for which it was originally collected or processed;
- We are processing your personal data based on your consent and you withdraw that consent;
- You object to the processing of your personal data and we have no overriding legitimate interest to continue;
- You have been illegally prosecuted;
- It must be deleted to comply with a legal obligation;
- He was prosecuted for offering information society services to a child.

There are some exceptions to this right. If any of these apply, we do not need to delete the personal data.

If we have shared your personal data with third parties, we will inform them of the erasure of your data unless this is impossible or involves a disproportionate effort.

Please note, in relation to such requests, that personal data may be deleted or retained in an aggregate manner without being linked to any identifier or personal data, depending on commercial technical capacity.

#### Restrict the processing of your personal data:

You can ask us to restrict the processing of your personal data in some circumstances, free of charge. This is not an absolute right. If the processing is restricted, we may store the personal data and retain enough information to ensure that the restriction is respected unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or for reasons of important public interest. , but we cannot continue to process your personal data.

You can restrict the processing of your personal data in the following cases:

- If you dispute the accuracy of your personal data, we will restrict the processing until we have ensured that the personal data is accurate.
- If you object to our processing pending verification of whether our legitimate interests prevail over your interests, rights, and freedoms or in connection with legal proceedings.
- If the processing is illegal but you do not want us to erase your personal data.
- If we no longer need personal data but you need it to establish, exercise or defend a legal claim.

If we have disclosed the data to a third party, we will inform you of the restriction unless it is impossible or requires disproportionate effort. We will inform you if we decide to lift a restriction on the processing of your personal data.

#### Oppose the processing of your personal data:

You have the right to object to the processing of your personal data at any time. This application will be free. It is not an absolute right, but you can object to us processing your personal data when:

- Based on the reason for legitimate interest; or
- For scientific / historical statistical and research purposes.

We will stop processing your personal data unless we have compelling legitimate reasons for the processing that override your interests and rights, or unless we are processing personal data for the establishment, exercise, or defense of legal claims.

You can ask us to stop using your personal data for direct marketing purposes. We will stop as soon as we receive your request, however we may not be able to implement this for any direct marketing campaigns that are already in progress. There are no exemptions or reasons for us to refuse.

## **Data portability**

This allows you to obtain and reuse your personal data for your own purposes across different services. Applies when the following conditions are met:

- You provided us with the personal data yourself.
- We are processing personal data based on your consent or because it is necessary for the performance of a contract; and
- The treatment it is done by automated means.

We will provide you with your personal data free of charge in a structured, commonly used, and machinereadable format.

## Automated decision making and profiling.

You have the right not to be subject to a decision that is based solely on automated processing and that has a legal (or equally significant) effect on you.

We will inform you of any automated decision making that affects you. You have the right to:

- Request human intervention;
- Express your point of view;
- Ask for an explanation of the decision; and
- Challenge the decision.

These rights are not absolute. We may not be able to comply with this request if the processing of personal data is:

- Necessary for us to enter into or perform a contract with you;
- Authorized by law (for example, for the prevention of fraud) and which also establishes the appropriate measures to safeguard your rights, freedoms, and legitimate interests; or
- Based on your explicit consent.

## Respond to requests to exercise your rights

We will respond to your request without undue delay no later than within one (1) month after receiving your request, unless it is particularly complicated or you have made multiple requests, in which case we can extend this for two (2) months. We will inform you if we are going to take more than one (1) month to attend to your request. If we have a lot of information about you, we may ask if you can tell us exactly what you want to receive. This will help us process your request more quickly.

In order to comply with your requests to exercise the rights listed above, we will carry out the necessary internal processes to identify you.

