



Privacy Policy

Hilderstone College is committed to protecting and respecting the privacy of its partners, students, employees and stakeholders and take great care to protect their personal information.

Privacy and General Principles

Hilderstone's privacy policy governs any kind of processing (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons using the College's websites. The policy applies to the College's processing of data collected through any means, actively as well as passively, online from persons located anywhere in the world. If you have a question regarding our processing of personal data, please direct it to: info@hilderstone.ac.uk. Please read the following policy carefully to understand what information we may collect from you, how we may use it, and your rights in respect of our use.

The College applies the following principles when processing data:

- We only collect data for specific and specified purposes
- We do not collect data beyond what is necessary to accomplish those purposes
- We will not use data for purposes other than those for which the data was collected, except as stated herein, or with prior consent
- We will not transfer data to third parties, except as stated herein, or with prior consent
- We will seek to verify and/or update data periodically, and we will accept requests for amendments of personal data
- We will apply high technical standards to make our processing of data secure
- Except when stated herein, we will not store data in identifiable form longer than is necessary to accomplish its purpose, or as is required by law

The College collects information on you:

- When you use our websites (hilderstone.ac.uk and hilderstone.net)
- When you enquire about, apply for and book a course or programme at the school or any other related service (e.g. homestay, airport transfer, social programme, insurance to cover you during your stay, access to our online study portal hilderstone.net), or where you give us feedback
- When you contact us for information, via our website, by email, by phone, in person or via social media channels
- When you work with us in a commercial capacity (for example as an ETO or partner)
- When you enrol for lessons or subscribe to our newsletter or other services
- When you add information about your studies and experience through our websites, and when you give us feedback about your experience of Hilderstone
- When you apply to work at and when you are subsequently employed by Hilderstone College
- When you apply to be a homestay provider
- If you post on our social media channels or on our website or blog.

The College may send your data to our partners such as Educational Tour Operators (ETOs), Government Agencies or Schools. Where required by law to do so, we may also process your data under Legal Obligation.

How and why the information is collected

Hilderstone College collects the information that you provide on our online and offline enrolment and enquiry forms, from emails, telephone calls and other forms of direct communication with the College. This typically includes: full names, email address, physical address and any other contact details.

Website Privacy

We may use information held about you in the following ways:

- To process a booking for one of our courses or products.
- To manage an application to work for the school, or to be a homestay.

- To create a profile for you to help us provide a more personalised service which is suited to meet your preferences.
- To ensure that content from our site is presented in the most effective manner for you and your computer.
- To send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

Any processing of customer data not directly related to the fulfilment of a booking or related services, such as signing up for newsletters, or sending messages to you on behalf of third parties, is managed under Consent. From time to time, we may use elements of the data you supply to target the messages we send to you. For example, we may use your location to send you information about an event or opportunity happening in your area. During your stay at Hilderstone College, we may take photographs or videos of you, and the use and processing of these is also managed through Consent.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.

We will make it as easy as we can for you to opt out of unwanted processing under Consent, providing it does not restrict our ability to provide you with the primary service you have requested.

We collect data for a wide range of purposes. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or pseudonymised and/or minimised and retained.

We remain responsible for the data held, processed or sent via our systems. We are not responsible for the security and processing of data which is held, processed or sent via our partners' systems. However, we require all of our partners overseas to confirm that they will process data securely in line with the requirements of GDPR or the equivalent in their country. We do not sell your data at any time.

Special Category and Criminal Record Data

We may request health data from potential students and employees. This data has special protection under the GDPR under the specific conditions listed in Article 9 (2) of the GDPR that processing is necessary either to protect the vital interests of the data subject, (or of another natural person where the data subject is physically or legally incapable of giving consent), or where processing is necessary for the purposes of preventive or occupational medicine or the assessment of the working capacity of an employee.

The College has safeguarding responsibilities and carries out DBS checks on all staff and other people who are likely to be have direct supervisory responsibility for or unsupervised contact with young people under the age of 18. We may process and record securely risk assessments of these DBS checks where the disclosure is not clear. These risk assessments will be disposed of securely when that person no longer has supervisory responsibility or unsupervised contact with young people under the age of 18 on behalf of the College.

Children Under 18

We collect or store personal information about children under the age of 18 in the context of managing bookings and directly related products, and for safeguarding purposes. Permission is obtained directly from a legal adult guardian to collect this information through our Parental Consent Form. As part of this process, we request special category data relating to the health of the child, which we manage through Vital Interest.

We also gain consent from parents/guardians for the use of photos or video taken during their child's stay at Hilderstone College through the Parent/Guardian's Consent to Study and Travel to and from the UK for students under the age of 18 form.

Links from our website

Our website contains links to and from websites operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies and that we do not accept any responsibility or liability for these policies. We advise you to check these policies before you submit any personal data to these websites.



IP Addresses and Cookies

From any point after you have entered our website we may collect information about your computer, including where available your IP address, operating system and browser type, for user analysis. This is statistical data about our users' browsing actions and patterns, and does not identify any individual, unless if information has been given by a user.

We may obtain information about your general Internet usage by using a cookie file, which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and to deliver a better and more personalised service.

The following cookies are used on Hilderstone's websites:

- **__cfduid** – From Cloudflare. The **__cfduid** cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. If a visitor's machine is trusted, the cookie allows Cloudflare to identify the client and not challenge them again. It does not correspond to any user ID in Hilderstone's web application, and does not store any personally identifiable information.
- **_ga, _gat and _gid** – These cookies are part of Google Analytics. See [Google Analytics Cookie Usage on Websites](#) for more information.
- **Local storage** – a temporary session file used when booking a course – the information held is the course name the booking is being made for and is used to fill in a field on the online enrolment form.

General Information about Cookies

Most browsers automatically accept cookies. You can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. Some browsers provide a mode where cookies are always deleted after a visit. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your computer or device at any time. If you choose not to accept cookies at all, you can still visit our website, however we cannot guarantee an optimum experience without cookies. Please view Google's [ads preferences manager](#) for details of how you can opt of providing information used for advertisement targeting.

Google Analytics

Our website uses [Google Analytics](#) to collect aggregated statistical information. These external sites set their own cookies. Please see Google's [privacy centre](#).

Personal Information and Your Rights

You have the right to rectify, erase or restrict the processing of your data subject to the exceptions outlined in this policy. You also have the right to withdraw consent to the processing of information for which you have previously given consent. You can contact us at any time to have these details removed from our database or to update this information, subject to satisfactory proof of your identity.

You may also request access to the data we hold on you. Provision of such information will be subject to:

- a) The payment of a fee (currently fixed at £10)
- b) The supply of appropriate evidence of your identity.

We may withhold personal information that you request to the extent permitted by the law.

[To make any of these requests relating to your personal data, please contact us at: info@hilderstone.ac.uk or contact the Head of Administration \(Tel: +44 1843 869171\)](mailto:info@hilderstone.ac.uk)

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on our website in this document. Please check from time to time to ensure that you are aware of any changes to our Privacy Policy. If we are required to by law, we will obtain your consent to make these changes. Your continued relationship with us will be deemed to signify your acceptance to any changes to our Privacy Policy.



Staff and Privacy

Any wilful breach of this policy by staff will be regarded as a disciplinary offence and will be dealt with under the school's formal disciplinary procedures.

Contact Information

Any request for information (personal information, requesting a correction, or to make a complaint) should be addressed in the first place to our Data Manager, who is our Head of Administration. He can be contacted at info@hilderstone.ac.uk, or on +44 1843 869171.

Hilderstone College
14-16 St Peter's Road,
Broadstairs,
Kent CT10 2JW, United Kingdom

Tel: +44 1843 869171

Email: info@hilderstone.ac.uk

Principal: Ian Johnson

If you are not satisfied with the way your request is handled, you have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office. Details are available from info@hilderstone.ac.uk on request.

Related policies

Hilderstone College will have regard to this Privacy Policy when developing other policies, in particular:

- Data Protection policy and procedure
- Safeguarding and Student Welfare Policy (*available on College website*)
- College internet usage and e-safety policy (*available on College website*)

Privacy Policy last updated 23 May 2018

Accredited by the
 **BRITISH COUNCIL**
for the teaching
of English in the UK

ENGLISHUK
member

 **International Association of Language Centres**

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CENTRE OF EXCELLENCE
2017

