

2024/25

2024/25 Privacy Policy Cambridge Spanish Centre

Cambridge Spanish Centre is committed to protecting your privacy. We use the information we collect about you to process orders and to provide a personalised service to you when you visit our website.

At Cambridge Spanish Centre, we appreciate that you do not want the personal information you provide to us distributed indiscriminately and here we explain how we collect information, what we do with it and what controls you have.

This Privacy Policy is for the website hosted at <u>https://www.cambridgespanishcentre.com/af/</u> ("we", "us" and "our website"). The website is operated by or on behalf of Cambridge Spanish Centre.

This policy sets out:

- What information we collect and how it is used
- Our use of cookies
- Our promotional updates and communications
- When we share information with outside parties
- Where information is stored and how long it is stored for
- Payment processing Stripe Policy
- How we protect personal information
- Your rights regarding your personal information
- Changes to this policy
- Contacting us

Please read the following information carefully in order to understand our views and practices regarding your personal information and how we will treat it. By engaging with our website, you acknowledge you have read and understood this privacy policy.

For the purposes of European data protection law, ("Data Protection Law"), the data controller is: Cambridge Spanish Centre



23 Greenside Waterbeach – CB25 9HW T: +44 (0) 1223 561854 E: info.cam.spanishcentre@gmail.com

1. WHAT INFORMATION WE COLLECT AND HOW WE USE IT

When you order we need to know:

• Your name, e-mail address, postal address;

• Your telephone number which enables us to contact you if there is a problem with your order. We need this information for our service with you so that we can process and fulfil your order, notify you of your order status and assist you if there is a problem with your order. We also use this information to administer your account with us and verify and carry out financial transactions in relation to payments you make under our contract with you.

• We will automatically collect information from you each time you visit our website. This includes technical information, information about your visit and location data. We use this to ensure in our legitimate interests that content from our website is presented in the most effective manner for you and the device you use, and that we provide you with the information, products and services that you request from us.

• Except as indicated in this privacy policy, any other personal information that you provide to us in connection with your website order is used either for the purposes of complying with contracts that you enter into via the website or with your consent. To the extent that this additional information includes any sensitive categories of personal data relating to your health, disability, beliefs, or sexuality, we will only use this information with your consent to support the requirements of your order and the services provided as expressly specified by you.

2. OUR USE OF COOKIES

Cambridge Spanish Centre uses cookies, tiny text files stored on your computer or device, when you visit certain web pages. The types of cookies we use are the kind that we use in our legitimate interest to keep track of what you have added into your shopping basket and cookies used with your consent, both for analytical purposes to help us understand our website better and to give you an improved online experience and for advertising/marketing.

3. OUR PROMOTIONAL UPDATE AND COMMUNICATIONS



Where permitted in our legitimate interest or with your prior consent where required by law, we will use your personal information for marketing analysis and to provide you with promotional update communications by email or post about our products/services or those of business partners identified to you.

You can object to further marketing at any time by checking and updating your contact details within your account or by sending us an email to info.cam.spanishcentre@gmail.com.

4. WHEN WE SHARE INFORMATION WITH OUTSIDE PARTIES

We may disclose your personal information in the following circumstances to:

• Organisations who process your personal information on our behalf and in accordance with our instructions and the Data Protection Law. This includes the services we offer through the website, in particular those providing website and data hosting services, distributing any communications we send, supporting or updating marketing lists, and providing IT support services from time to time. These organisations, which may include third party suppliers, agents, sub-contractors, will only use your information subject to contractual safeguards and only to the extent necessary to perform their support functions.

• Payment processing providers who provide secure payment processing services (note your payment card details are not shared with us by the provider).

We may also disclose your personal information to third parties:

• In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.

• If Cambridge Spanish Centre or substantially all of its assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets.

• If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of supply terms and other agreements with you; or to protect the rights, property, or safety of Cambridge Spanish Centre, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.



5. WHERE IS THE INFORMATION STORED, AND HOW LONG IS IT STORED FOR?

Information which you submit via the website platform Oncord is sent to a computer located in Australia. This is necessary to process the information and to send you the information you have requested. Oncord does not store cardholder information. It is all sent to a payment gateway and 'tokenised' for use. Oncord stores all data in physically secure data centres (swipe card, cctv, key, biometrics are used). Oncord is still going to set up EU infrastructure in the coming months.

Where your information is transferred outside the EEA, we will take all steps necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy.

We retain personal data for as long as you have an account with us or in order to meet our contractual obligations to you for six years after that to identify any issues and resolve any legal proceedings.

We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

Transfers outside of EEA

We may transfer your personal information outside the EEA:

- To enable us to provide goods or services to you and fulfil our contract with you. This includes order fulfilment, processing of payment details, and the provision of support services.
- Where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Google is certified under the EU-US Privacy Shield. The EU-US Privacy Shield requires Google Analytics and other certified US service providers to provide a similar level of protection of your personal data as would be required in the EU.



6. HOW DO WE PROTECT CUSTOMER INFORMATION

To prevent unauthorised access as required by Data Protection Law, we follow strict security procedures in the storage and disclosure of information which you have given us. Our security procedures mean that we may request proof of identity before we are able to disclose personal data to you following a request from you to do so. We use a secure server by which you may place your order or access your account information.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via 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 unauthorised access.

This website may, from time to time, contain links to other sites. We are not responsible for the privacy policies or the content of such sites.

7. PAYMENT PROCESSING

Stripe: We provide financial infrastructure for the internet. People use our services to enable their purchases and businesses of all sizes use our technology and services to accept payments, send payouts, and manage their businesses online. Stripe wants to be clear about our use of the Personal Data that is entrusted to us.

This Privacy Policy ("Policy") describes the "Personal Data" that we collect about you, how we use it, how we share it, your rights and choices, and how you can contact us about our privacy practices. This Policy also outlines your data subject rights, including the right to object to some uses of your Personal Data by us. Please visit the <u>Stripe Privacy Center</u> for more information about our privacy practices.

Metro Bank: Metro Bank PLC, ("**Metro Bank**", "we" or "us"), registered in England and Wales. Company number: 6419578. Email: DataProtectionOfficer@metrobank.plc.uk

We are a controller for the processing activities specified in this privacy notice that relate to your personal data.

5 Cambridge Spanish Centre **Tel. : +44 (0) 1223 561854 23 Greenside Waterbeach- CB25 9HW - Cambridge - England** <u>www.cambridgespanishcentre.com</u> Non-profit organisation 11266958 Business/ Spanish centre/ policies/ policies2024-25



This privacy notice also explains how other parties, including companies belonging to the Metro Bank group, may use your personal data. Some of our products, applications or services have separate privacy notices which do not incorporate this privacy notice.

Our Privacy Notice gives you all the details you need to know about how we use your personal information and your privacy rights. Personal information includes what you tell us about yourself, what we learn about you as a customer, and the ways you've told us we can get in touch.

You can read the full Privacy Notice on Metro Bank's website: <u>https://www.metrobankonline.co.uk/about-us/privacy/</u>.

8. YOUR RIGHTS REGARDING YOUR PERSONALLY IDENTIFIABLE INFORMATION

You have the right under certain circumstances:

- to be provided with a copy of your personal data held by us;
- to request the rectification or erasure of your personal data held by us;

• to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);

- to object to the further processing of your personal data, including the right to object to marketing (as mentioned in 'Our promotional updates and communications');
- to request that your provided personal data be moved to a third party.

Your right to withdraw consent:

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time You can also change your marketing preferences at any time as described in 'Our promotional updates and communications' section;

You can also exercise the rights listed above at any time by sending an email to info.cam.spanishcentre@gmail.com or by contacting us using details below.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, <u>https://ico.org.uk</u>. The Information Commissioner ("ICO") is the supervisory authority in the UK.



9. CHANGES TO THIS POLICY

Any changes we make to our privacy policy in future will be posted on this page and, in relation to substantive changes, may be notified to you by email. This policy was last updated on 11/10/24.

10. CONTACT DETAILS

Cambridge Spanish Centre

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