



THE LANGUAGE TRAINING CO WEBSITE PRIVACY STATEMENT

The Language Training Co services, including (without limitation) our website and other interactive properties through which the services are delivered (collectively, the "Service") are owned, operated and distributed by The Language Training Co (referred to in this Privacy Statement as "The Language Training Co" or "we" and through similar words such as "us," "our," etc.).

The Language Training Co is committed to protecting your privacy and takes its responsibility regarding the security of customer information very seriously. Our website Privacy Statement sets out what information we collect, how we collect it, what we do with it and how we protect this information. Any personal information is collected and processed in accordance with the data protection laws in the jurisdictions in which we operate (e.g. United States ("US") and European Union ("EU")).

The Language Training Co encourages our customers, visitors, business associates, and other interested parties to read this Privacy Statement, which applies to all users of the Service. By using our Service or submitting personal information to The Language Training Co by any other means, you acknowledge that you understand and agree to be bound by this Privacy Statement, and agree that The Language Training Co may collect, process, transfer, use, and disclose your personal information as described in this Statement. Further, by accessing any part of the Service, you are agreeing to THE TERMS AND CONDITIONS OF OUR TERMS OF USE (the "Terms of Use"). IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY STATEMENT OR OUR TERMS OF USE, PLEASE DO NOT USE ANY OF THE SERVICES.

COLLECTION OF PERSONAL INFORMATION

Personal information (also commonly known as personally identifiable information (PII) or personal data) is information that can be used to identify you, or any other individual to whom the information may relate. The categories of personal information that The Language Training Co may collect in the course of our relationship with you is described below.

Information you provide to us: In order to facilitate the provision of education, we collect personal details from you together with information we learn about you from your use of our website. These details may include (where applicable)

- Name and contact information (e.g., address, telephone number, e-mail)
- Billing information (e.g. credit/debit card, other payment details, billing contact information)
- Account information (e.g. personal goals, account profile photos, ratings, webinar chat)
- Information contained in posts you may make on the public forums and interactive features of the Service;
- Other information that may be exchanged in the course of engaging with the Service. You will be aware of any subsequently collected information because it will come directly from you.



Information we collect automatically: We collect information about you and your use of our service, your interactions with us and our advertising, as well as information regarding your computer or other device used to access our service (such as smart TVs, gaming systems and mobile devices). This information includes:

- your activity on the Service, such as course selections and attendance/watch history
- your interactions with our email, webinar chat, push and text messaging
- details of your interactions with Customer Service, such as the date, time and reason for contacting us, transcripts of any chat conversations, and if you call us, your phone number and call/video recordings
- IP address, device IDs, or other unique identifiers
- advertising identifiers, such as those on mobile devices, tablets, and streaming media devices that include such identifiers (see the “Cookies and Internet Advertising” section below for more information)
- device and software characteristics (such as type and configuration), connection information, statistics on page views, referring source (for example, referral URLs), IP address (which may tell us your general location), browser and standard web server log information
- information collected via the use of cookies, web beacons and other technologies, including ad data (such as information on the availability and delivery of ads, the site URL, as well as the date and time).

To provide location-based services we may collect, use, and share precise location data, including the real-time geographic location of your computer or device through GPS, Bluetooth, and your IP address, along with crowd-sourced Wi-Fi hotspot and cell tower locations. This location data is collected anonymously unless you provide consent. You may withdraw consent to The Language Training Co and our partners’ collection, use, transmission, processing and maintenance of location and account data at any time by not using the location-based features and turning off the Location Services settings (as applicable) on your device and computer.

USE OF PERSONAL INFORMATION

Subject to the terms of this Privacy Statement, The Language Training Co uses the above described categories of personal information in several ways. Unless otherwise stated specifically, the above information may be used for any of the following purposes:

- to administer the Service to you
- to respond to your requests
- to distribute communications relevant to your use of the Service, such as system updates, customer surveys, or information about your use of the Service
- as may be necessary to support the operation of the Service, such as for billing, account maintenance, and record-keeping purposes



- to send to you The Language Training Co solicitations, product announcements, and the like that we feel may be of interest to you (you may “opt out” of receiving these marketing materials)
- to enhance and personalize our services and marketing efforts
- in other manners after subsequent notice is provided to you and/or your consent is obtained, if necessary.

SHARING INFORMATION ABOUT YOU

We follow strict security procedures in the storage and disclosure of student information.

We may disclose any of the described categories of personal information to The Language Training Co employees, consultants, affiliates or other businesses or persons for the purpose of processing such information on our behalf in order to provide the Service to you. These disclosures may include trusted contracted companies who act as “data processors” on our behalf for the purposes set out in this Privacy Statement. In such circumstances, we require that these parties agree to protect the confidentiality of such information consistent with the terms of this Privacy Statement by executing transfer agreements with all entities to which we transfer data for processing. The agreements provide for specific and limited processing of user data in service of The Language Training Co’s operations and have been prepared so as to meet the requirements of the jurisdictions in which we operate (including the US and EU).

Where permitted by law, we may also pass your information (including relating to the stages of your training) to third parties with whom we have a contractual or other close relationship and where we believe they offer products or services that may enhance the training we provide to you, your ability to practice or gain additional skills or their offering may otherwise be of interest to you.

In addition, we may release personal information

- to the extent we have a good-faith belief that such action is necessary to comply with any applicable law
- to enforce any provision of the [Terms of Use](#), protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare
- when disclosure is required to maintain the security and integrity of the Service, or to protect any user’s security or the security of other persons, consistent with applicable laws
- to respond to a court order, government inquiry, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or
- in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

Finally, you may be able to access third party social media services through our website or before coming to our website. When you are registered with your social service account, we will obtain the personal information you choose to share with us through these social media services pursuant to their privacy settings in order to improve and personalize your use of our



website. This may include a list of friends and reviews of other users in your network. We may also use social media plugins on our website. As a result, your information will be shared with your social media provider and possibly presented on your social media profile to be shared with others in your network. Please refer to the privacy policy of these third-party social media providers to find out more about these practices.

THE LANGUAGE TRAINING CO STUDENT/MEMBERS AREA/VIRTUAL CLASSROOM

All data collected upon registration in The Language Training Co will be processed in line with this Privacy Statement. In your personal The Language Training Co student area we store all your course information, so that you can access it whenever you wish.

We understand the importance of taking extra precautions to protect the privacy and safety of children. Accordingly, children under 16 will not be permitted to open a The Language Training Co account. We will take reasonable steps to delete any The Language Training Co account or information created by a child under 16, as soon as we learn about it.

All payment details are transmitted over a secure connection (Secure Socket Layer-SSL) across dedicated network infrastructure (Multiprotocol Label Switching-MPLS) and stored in compliance with Payment Card Industry Data Security Standards (PCI DSS).

You may delete your The Language Training Co account by contacting The Language Training Co support [here](#) (Please see your Rights Section for more details).

Finally, we may invite you to post content on the Service, including your comments and any other information that you would like to be available on the Service, which may become public ("User Generated Content"). If you post User Generated Content, all of the information that you post will be available to authorized personnel of The Language Training Co and may be made publicly available. You expressly acknowledge and agree that we may access in real-time, record and store archives of any User Generated Content on our servers to make use of them in connection with the Service. If you submit a review, recommendation, endorsement, or other User Generated Content through the Service, or through other websites including Facebook, Instagram, Google, Yelp, and other similar channels, we may share that review, recommendation, endorsement or content publicly on the Service.

DIRECT MARKETING MATERIAL

From time to time we or our selected partners may contact you with information regarding course promotions and ancillary products via channels including but not limited to email, voice, text, push notifications, internet-based ads and otherwise as the company sees fit. However, you will be given the opportunity on every e-communication that we or our trusted partners send you to indicate that you no longer wish to receive our or their direct marketing material.

YOUR CHOICES REGARDING DIRECT MARKETING



Email and Text Messages: If you no longer want to receive certain communications from us via email or text message, simply click the “unsubscribe” link in the email or reply STOP (or as otherwise instructed) to the text message. Please note that you cannot unsubscribe from service-related correspondence from us, such as messages relating to your student account transactions or course lesson reminders or information directly relating to your course.

Push Notifications: You can choose to receive mobile push notifications from The Language Training Co. If you subsequently decide you no longer wish to receive these notifications, you can use your mobile device’s settings functionality to turn them off.

Interest-Based Ads: Interest-based ads are online ads that are tailored to your likely interests based on your use of various apps and websites across the Internet. If you are using a browser, then cookies and web beacons can be used to collect information to help determine your likely interests. If you are using a mobile device, tablet, or streaming media device that includes an advertising identifier, then that identifier can be used to help determine your likely interests. For your choices about interest-based ads from The Language Training Co, please see the “Cookies” section (below).

SITE TRACKING AND COOKIES

We use tracking software to monitor customer traffic patterns and site usage to help us develop the design and layout of the websites. This software does not enable us to capture any personal passenger information.

We and our Service Providers use cookies and other technologies (such as web beacons), as well as advertising identifiers, for various reasons. For example, we use these technologies to make it easy to access our services by remembering you when you return, to provide and analyze our services. We also use cookies, as well as advertising identifiers, to learn more about our users and their likely interests, and to deliver and tailor marketing or advertising. We want you to be informed about our use of these technologies, so this section explains the types of technologies we use, what they do and your choices regarding their use.

LINKS TO THIRD PARTY WEBSITES

This privacy statement only covers websites that we own and control. It does not cover links to other websites and accordingly any information collected by those parties that own and control those websites or their use of cookies set from their domains when you visit their websites. Please be aware that individual third-party organizations operate their own policies regarding the use and sale of personal information and the use of cookies. If you have a concern regarding the way your personal information will be used on other sites or on the type of cookies used and how they are being used then you are advised to read the relevant privacy statement and cookie policy or in the absence of such a statement and policy on the site, contact the company concerned. Any data stored by third party websites are stored completely separately by third party.

You hereby acknowledge and agree that The Language Training Co is not responsible for the privacy practices, data collection policies and procedures, or the content of such third-party



sites, and you hereby release The Language Training Co from any and all claims arising out of or related to the privacy practices, data collection policies and procedures, and/or the content of such third-party sites.

THIRD PARTY ADVERTISERS

We may allow other companies, called third-party ad servers or ad networks, to serve advertisements within the Service. These third-party ad servers or ad networks use technology to send, directly to your device, the advertisements and links that appear on the Service. They automatically receive your device ID and IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content you see. You should consult the respective privacy policies of these third-party ad servers or ad networks for more information on their practices and for instructions on how to opt-out of certain practices. This Privacy Statement does not apply to them, and we cannot control their activities.

INFORMATION SECURITY AND USER RESPONSIBILITY

We take great care to ensure the security of our website. The data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet. However, the security of information transmitted through the internet or via a mobile device can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data.

Users of the Service are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Service. In order to protect you and your information, we may suspend your use of any of the Service, without notice, pending an investigation, if any breach of security is suspected.

INTERNATIONAL DATA TRANSFER

If you are located outside the UK, in particular if you are located in Switzerland, the United States, or the European Economic Area ("EEA"), please note that The Language Training Co is an international organization, and any information that you provide to us may be transferred to and processed in the UK or other countries around the world where we do business. Although this may include recipients of information located in countries where there may be a lower level of legal protection for your personal data than in your country, we will protect your information in accordance with requirements applicable to the law in your particular jurisdiction and take steps to only share with third parties that offer similar



protection. By using our Service, you unambiguously consent to your information being collected, processed, used, and transferred as disclosed herein.

EUROPEAN UNION DATA PRIVACY RIGHTS

If you are located in EEA, the General Data Protection Regulation ("GDPR") may grant you certain rights under the law. In particular, the right to access, correct, and delete the personal information we hold about you. The Language Training Co will retain your personal information for the length of time you engage with our services as described in the retention section of this Statement, unless you request deletion of such personal data.

In certain circumstances, you have the following data protection rights:

- The right to access, update or delete the personal information we have on you.
- The right of rectification. You have the right to have your personal information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your personal information.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the personal information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information.

You can most easily exercise your privacy right do this by visiting the "account" section within your Members Area, where you have the ability to access and update your contact information. You must be signed in to access the "account" section. You may also request that we delete personal information that we hold about you.

To make requests, or if you have any other question regarding our privacy practices, please contact our data protection officer/privacy office at info@thelanguagetrainingco.co.uk We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Please also see the "your choices" section of this privacy statement for additional choices regarding your information.

If you have a comment, question, or complaint about how we are handling your personal information, we hope that you contact us as described in this Statement in order to allow us to resolve the matter.

LEGAL BASIS FOR PROCESSING UNDER GDPR

Our legal basis for collecting and using the personal information described in this Privacy Statement will depend on the personal information concerned and the specific context in which we collect and use it. We will normally collect personal information from you where



- we need the personal information to perform a contract with you (for example, to provide our services to you)
- where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for example, our direct marketing activities in accordance with your preferences)
- where we have your consent to do so (for example, for you to participate in certain consumer insights activities like specific surveys and focus groups) or
- where we have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example, to prevent payment fraud or confirm your identity)

Where personal information is processed based on consent, EU residents have the right to withdraw such consent at any time. To do so, please contact us as described in this Statement. If there is a different legal basis that would permit us to continue processing your personal information after withdrawing consent, we will notify you of that legal basis at the time of your request. For questions about our use of your personal information (including legal bases and transfer mechanisms we rely on), cookies or similar technologies, please contact our Data Protection Officer/Privacy Office by email at info@thelanguagetrainingco.co.uk

RETENTION OF DATA

The Language Training Co will retain your personal information only for as long as is necessary for the purposes set out in this Statement. We will retain and use personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Language Training Co will also retain usage data for internal analysis purposes as described in the this Statement. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the Service, or we are legally obligated to retain this data for longer periods.

CHILDREN'S PRIVACY

The Service is not intended for children under the age of 16, and The Language Training Co does not knowingly collect the personal information of children under the age of 16.

OUR REGISTERED ADDRESS IS:

The Language Training Co Ltd
44-46 St Peters Road



Bournemouth
Dorset
BH1 2LT
United Kingdom

CHANGES TO PRIVACY STATEMENT

Our Privacy Statement may change from time to time and any changes to the statement will be posted on this page.