



## **Equinox Education Services Ltd Privacy Policy 2022 \_ 2023**



### **Know your rights under GDPR!**

#### **Introduction**

This Privacy Policy explains in general terms how Equinox Education Services Ltd (EES) collects, holds, uses and discloses your personal information under the GDPR regulations. A separate 'Privacy Statement' pertaining to how we apply data protection principals to the data processed on [www.equinoxlearnabroad.com](http://www.equinoxlearnabroad.com) can be found at [www.equinoxlearnabroad.com/privacy](http://www.equinoxlearnabroad.com/privacy).

We may amend this Privacy Policy as our business requirements or the law changes. Any changes to this Privacy Policy will be updated on our web site [www.equinoxlearnabroad.com](http://www.equinoxlearnabroad.com). We may also issue specific privacy collection notices from time-to-time relating to particular products or services.

## **Information We Collect**

The types of personal information that we collect about you will depend on our relationship with you. The personal information may include:-

### **Host Families**

Your name, gender, kids' gender and age if applicable, contact details, rooms available, Pet details, Smoking/Non-Smoking, If Wi-Fi is available, financial details to allow payment processing.

### **Students**

Name, Age, Gender, your dietary requirements and health issues which you provide to us in connection with placing you in appropriate host family and to offer support and assistance as required. Flight details to facilitate airport transfers.

If you are a group leader traveling with students we will request your name, contact details and any dietary or health issues that will assist EES make your stay with us more comfortable.

## **How We Collect Information**

We collect your information via the phone for the most part especially for host families. With regards to students we receive your details from the organising agent in your host country. In relation to individual students coming independently we receive your details from our application form which is completed by parents or guardians if under 18 years old.

These third parties may include:-

## **How We Use Your Personal Information**

We may use your personal information for the following purposes:

- To match students with suitable host families taking into account allergies and dietary requirements;
- To facilitate payment for hosting students;
- To apply for Garda vetting as outlined in Equinox Child Protection and Safeguarding Policy;
- To inform parents of under 18 students where their son/ daughter will be staying for the duration of their stay with EES.

## **Disclosure of Personal Information**

We may disclose your personal information to others in connection with the core work carried out by EES i.e. to facilitate the hosting of short and long term academic and cultural programs which involves a stay with an Irish family.

We may also disclose your personal information to the organisation agent who are sending the group. This is required and only done after the host family have agreed to host the student.

We may also disclose your personal information to comply with our legal obligations, including to various law enforcement agencies, regulatory authorities and governments.

### **How We Hold Information and Keep it Secure**

We hold your personal information in a combination of hard copy and electronic files. We use third party information system providers who may store or have access to your personal information.

All Hard Copies are locked away and all EES computers and devices have anti-virus software and are encrypted.

### **Disclosure of Information Overseas**

In the course of providing our services, we may disclose your personal information within EES and authorised partners located overseas who assist us in providing our programs.

While most of our partners are located in Europe we also work with partners in Japan and Malaysia . Service and privacy contracts are in place with all our partners in relation to protecting the rights of the individual.

### **Access & Correction of Information 'About You'**

If you would like to request access to, or correction of, your personal information we hold about you, please contact us using the contact details in the section titled '[Our Contact Details](#)'.

We will provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception which applies under GDPR.

This information is available from EES free of charge and is readily available as long as it does not impede on the rights of another individual.

Your request to provide access to this information will be dealt with within a reasonable time.

You will also have the right to ask for your data to be erased from our database at anytime.

In the very rare case if we refuse to provide you with access to, or correct, the information, we will notify you of our reasons for refusal to the extent required and how you may complain about the refusal.

## The rights of the Subject in relation to individuals and EES

Under GDPR which EES is fully compliant the rights of the individual is greatly enhanced. Below is an outline of your rights.

- A) **The right to be informed:** As mentioned in Article 13 individuals have the right to know who the Controller is, The method of processing their data, details of any 3<sup>rd</sup> parties involved and assurances that safeguards are in place to comply with Article 46, How long EES holds the information.
- B) **The Right of Access:** As outlined in Article 15 The individual shall have the right to receive from the Controller details of any Personal data concerning him/her and also have access to, the reason EES has their information, the type of information, how long EES keeps their information. The individual has the right to obtain a copy of any information that EES holds, free of charge as long as it does not affect the rights and freedom of others. The maximum period is 1 month to process a request for information from an individual.
- C) **The right to be Forgotten:** As covered in Article 17 the EES has an obligation to delete personal data without due delay if one of the following are the case, Data no longer necessary, when requested to do so by the individual in question, when data was unlawfully obtained i.e. in breach of GDPR.
- D) **The right to Rectification:** As covered in article 19 the data subject has the right to request rectification of data stored. EES has an obligation to complete any incomplete personal data or make corrections if instructed by Data subject without due delay.
- E) **Right to Object:** As covered in Article 21 the Data subject has the right to object on grounds on their personal circumstances. EES MUST stop processing the Personal Data unless he/she can demonstrate strong legitimate grounds for processing that override the rights of the individual or is required for a legal reason. In easy terms the EES must stop processing unless EES can prove without doubt it is essential i.e. legal reason. There must be an easy to understand method of objecting available to all individuals whose personal data EES is controlling or processing.
- F) **Data Portability:** This is a new requirement under GDPR; it is covered in Article 20. This only applies in the following circumstances: -
  - 1) To personal information that an individual has provided to a controller.
  - 2) Where the process is based on individuals consent or for the performance of a contract.
  - 3) When processing is carried out by automated means.

## Privacy Complaints and Further Information

If you have a concern about your privacy or you have any query on how your personal information is collected or used please contact us using the details below. We will respond to your query or complaint within a reasonable time. If you are not satisfied with our response, you may also contact the Data Protection Commission.

## Our Contact Details

### Equinox Education Services Ltd

Carlow Gateway Business Centre  
Athy Road  
Carlow  
IRELAND

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