

## ATLANTIC COLLEGE ENTERPRISES LIMITED (ACEL) PRIVACY NOTICE

Owner: Vice Principal (Operations and Administration)

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### ABOUT US

Atlantic College Enterprises Limited (company number 07734369) is a company registered in England and Wales and is a wholly owned-subsiary of the United World College of the Atlantic Limited. Atlantic College Enterprises Limited is referred to as "ACEL", "we", "our" or "us" in this privacy notice.

### IMPORTANT INFORMATION

This Privacy Notice aims to give you information on how we collect and process your personal data and is intended to ensure that your personal information is dealt with in accordance with the General Data Protection Regulation (GDPR). This notice includes any data you may provide through our website, over the telephone, when you visit, or otherwise interact with us.

This privacy notice covers:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

### HOW WE USE YOUR DATA

#### General

ACEL uses your personal data:

- to provide goods and services to you;
- with your agreement, to contact you electronically about promotional offers and products or services which we think may interest you;
- for market research purposes - to better understand your needs;
- to enable ACEL to manage customer service interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

#### Promotional communications

You have the right to opt out of receiving promotional communications from Atlantic College Enterprises Limited at any time, by contacting [bookings@atlanticcollege.org](mailto:bookings@atlanticcollege.org).

#### Sharing data with third parties

ACEL will not disclose your personal data to any third party, except as an essential part of being able to provide our services to you, for example:

- with carefully selected partners where we have your consent to do so;
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so;
- to comply with our legal obligations or exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our employees and other customers.

## WHAT PERSONAL DATA WE COLLECT

### Information that you give to us

ACEL may collect the following information about you:

- your name, age/date of birth and gender;
- your contact details: postal addresses, telephone numbers (including mobile numbers) and e-mail address;
- purchases and orders made by you;
- when you make a purchase or place an order with us, your payment card details;
- your communication and marketing preferences; and
- your correspondence and communications with ACEL.

We will only collect information about children where we have the express consent from the child's parent or guardian. We will only use the information that you provide about children to fulfil our specific agreement with you.

On occasion we may need to collect additional data for example, when you make a new purchase or contact our box-office team.

### Information that we collect automatically

We may use cookies to monitor and analyse visits to our website and to collect information about your activity. If you prefer, you can remove or reject browser cookies through the settings on your browser or device. However, rejecting or removing cookies could affect the availability and functionality of our services.

### Sensitive personal data

Data protection law recognises that certain categories of personal information are more sensitive than others. We do not usually collect this type of information, unless there is a clear reason for doing so, such as to ensure participants safety and wellbeing during an event.

## HOW WE PROTECT YOUR DATA

ACEL is committed to keeping your personal data safe and secure. This includes using a range of IT security measures, access controls, and internal policies setting out our data protection approach and associated training for employees.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## HOW LONG WE KEEP YOUR DATA

Your personal data will only be kept for as long as necessary in accordance with our data retention policy.

## YOUR RIGHTS UNDER THE GDPR

In addition to providing a legal basis for processing data, the GDPR provides the following rights for individuals:

### 1. The right to be informed

ACEL will provide concise, transparent, intelligible and easily accessible information about the processing of personal data to individuals using this Privacy Notice.

### 2. The right of access

Where requested, ACEL will provide individuals with access to their personal data held. This will be processed as a Subject Access Request, and ACEL will provide a copy of the

information free of charge (unless a request is clearly excessive or unfounded), within one month of the request.

### **3. The right to rectification**

ACEL is committed to rectifying personal data if inaccurate and will respond to a request for rectification within one month of receiving the request.

### **4. The right to erasure**

ACEL will consider individual requests for deletion or removal of personal data where there is no compelling reason for its continued processing, in line with the conditions set out in the regulation. ACEL will inform relevant third parties of erasure of personal data; unless it is impossible, or involves disproportionate effort to do so.

### **5. The right to restrict processing**

ACEL will ensure that data processing is restricted in any of the following circumstances:

- Where an individual contests the accuracy of personal data until the accuracy is verified
- Where an individual has objected to the processing
- When processing is unlawful

If data processing is restricted, ACEL will notify any relevant third parties.

### **6. The right to data portability**

ACEL will comply with individual requests to allow an individual to obtain and reuse their personal data for their own purposes across different services.

### **7. The right to object**

ACEL will comply with an individual's right to object to processing of their personal data based on legitimate interests (to 'opt out') or the performance of a task in the public interest/exercise of official authority. ACEL will inform individuals of their right to object using this Privacy Notice.

### **8. Rights in relation to automated decision making and profiling**

ACEL will adhere to GDPR requirements which specify that automated decision making or automated processing of personal data (without any human involvement), including profiling, can only be carried out where this type of decision making is necessary for a legal contract or based on the individual's consent.

## **CONTACTS**

The Vice Principal (Operations and Administration) is appointed as the Data Controller. If you have any enquires in relation to this policy, please contact the Data Controller, Paul Robinson, via email [paul.robinson@atlanticcollege.org](mailto:paul.robinson@atlanticcollege.org).

The Data Controller will also act as the contact point for any requests for personal data, or any complaints in relation to the processing of personal data.

Further advice and information is available from the Information Commissioner's Office:

[www.ico.org.uk](http://www.ico.org.uk)

Telephone: +44 (0)303 123 1113

## **CHANGES TO THIS PRIVACY NOTICE**

This privacy notice was published on 23<sup>rd</sup> May 2018 and last updated on 23<sup>rd</sup> May 2018. Any changes we make to this notice will be posted on this page.