

DATA PROTECTION POLICY AND PRIVACY STATEMENT FOR AGENTS AND VISITORS TO OUR WEBSITE

The Carfax Education Group is committed to protecting and respecting your personal data. The data that we gather and hold is managed in accordance with the General Data Protection Regulations (GDPR) 2018. This privacy policy explains how we use any personal information that we collect about you when you engage with any of our activities or services, with effect from 25 May 2018:

1. Who We Are

- 1.1 The Carfax Education Group (the 'Group') operates in the United Kingdom and elsewhere in Europe through the following business units:
 - a. Carfax Tutors (operated by Carfax Private Tutors Limited with company number 07424011 and registered office address at 25 Beaumont Street, Oxford, Oxfordshire, OX1 2NP);
 - b. Carfax Guardians (operated by Carfax Educational Guardians Limited with company number 07424012 and registered office address at 25 Beaumont Street, Oxford, Oxfordshire, OX1 2NP);
 - c. Carfax Consultants (operated by Carfax Consultants Limited with company number 10306817 and registered office address at 25 Beaumont Street, Oxford, Oxfordshire, OX1 2NP);
 - Carfax Recruitment (operated by Carfax Education Services Limited with company number 10306013 and registered office address at 25 Beaumont Street, Oxford, Oxfordshire, OX1 2NP);
 - e. Summer Guide (operated by Summer Guide Limited with company number 10563485 and registered office address at 25 Beaumont Street, Oxford, Oxfordshire, OX1 2NP); and
 - f. Carfax College (operated by Carfax Tutorial Establishment Limited with company number 07424018 and registered office address at 39-42 Hythe Bridge Street, Oxford, Oxfordshire, OX1 2EP).
- 1.2 The Group comprises a number of educational enterprises and institutions, each focused on bringing the best of British, American, and Swiss education to private and corporate clients around the world.

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Carfax Education Ltd is part of the Carfax Education Group. Company Registered in England no. 07423781. Registered address: 25 Beaumont Street, Oxford, OX1 2NP. The group, founded in the United Kingdom, has established a strong international presence with a growing network of offices in London, Oxford, Monaco, Dubai, Abu Dhabi, Moscow, St Petersburg, and Baku. From engaging private tutors for the world's most demanding families to advising and operating prestigious schools, from university admissions counselling and school entry guidance for ambitious applicants to delivering education projects for governments and NGOs, sometimes in the world's most challenging places, everything that Carfax Group does is based on the 'Carfax Approach' that accepts no compromise on academic excellence.

2. How You Can Contact Us

- 2.1 All general enquiries can be sent to <u>enquiries.ce@carfax-education.com</u> or by calling one of the office telephone numbers on our website: <u>www.carfax-education.com</u>.
- 2.2 The Group's Data Protection Officer, responsible for data protection across the Group and the overall organisation, is Matthew Goldie-Scot, who can be contacted at the following e-mail address: m.goldie-scot@carfax-education.com.

3. The Data We Collect and How We Use It

Below are outlined the different ways in which we collect and process data from people engaging across our activities and services. Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights.

3.1 Our agents:

- 3.1.1 We collect information that you provide when you apply to work as an agent for the Group, such as your name, postal address and e-mail address. We will only process your data in the following ways where you have given us explicit consent to do so by agreeing to the terms of this privacy notice. The information that you provide forms a 'person record' that is stored securely on our computer system.
- 3.1.2 We use this information to:
 - 3.1.2.1 Manage the services provided by you to the Group and/or the Group's clients;
 - 3.1.2.2 Contact you using the e-mail address you provided; and
 - 3.1.2.3 Process commissions payable to you pursuant to agreements signed with one or several of the Group's entities.
- 3.2 Recipients of our newsletters and other circulars:
 - 3.2.1 We collect your name and e-mail address for the following purposes:

- 3.2.1.1 To provide you with information about the Group's activities (e.g., a newsletter); and
- 3.2.1.2 To contact you about other relevant activities.
- 3.2.2 We use a third-party provider, Mailchimp, to deliver our newsletters. We gather statistics around e-mail opening and clicks using industry standard technologies, to help us monitor and improve our newsletter. For more information, please see <u>Mailchimp's privacy notice</u>.
- 3.3 Visitors to our websites:
 - 3.3.1 Those who visit any of our websites are, in so doing, agreeing to be bound by the terms of this privacy notice.
 - 3.3.2 We collect log data about you whenever you visit our websites. We will only use this data in order to troubleshoot problems with your use of the websites (for example, if a form will not load) and never to do any individual profiling of you for marketing purposes. The information that we may collect includes: originating IP addresses, internet service providers, the files viewed on our site (*e.g.*, HTML pages, graphics, *etc.*), operating system versions, device type and timestamps.
 - 3.3.3 We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this in order to:
 - 3.3.3.1 Find out things such as the number of visitors to the various parts of our websites; and
 - 3.3.3.2 Make improvements to the ways in which we market our opportunities and how people interact with our websites.

This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

- 3.4 Cookies:
 - 3.4.1 We use third-party tracking services that employ cookies and page tags (also known as web beacons) to collect data about visitors to our websites. This data includes usage and user statistics.
- 3.5 People who email us (including new client enquiries and tutor applications):
 - 3.5.1 To encrypt and protect e-mail traffic, we use Transport Layer Security (TLS) by default, but when a secure connection isn't available (both sender and recipient need to use TLS to create a secure connection), messages will be delivered over non-secure connections. If your e-mail service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

3.5.2 We will also monitor any e-mails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any e-mail you send is within the bounds of the law.

4. How We Share and Transfer Your Personal Data to Other Organisations

- 4.1 We will never sell, rent, or trade your personal data. We may disclose your data to service providers who render services to us or on your behalf (*e.g.*, Mailchimp, Google and TutorCruncher, amongst others), all of which are obliged to operate in accordance with applicable laws, including GDPR.
- 4.2 Some business units may also share specific data with the Group's affiliated overseas offices (*e.g.*, Carfax Moscow, Carfax Dubai, Carfax Baku, and others).
- 4.3 We also may disclose your information if required by law or to enforce our legal rights.
- 4.4 Some of our service providers lie outside of the EEA (*e.g.*, Mailchimp and Google.) Therefore, sometimes we transfer your data outside of the EEA. If we do, we ensure your data is processed only in countries that provide an adequate level of protection for your data or where the recipient provides appropriate safeguards, such as mechanisms like the EU-US Privacy Shield Framework.
- 4.5 You can read more about how our service providers comply with GDPR here: <u>Mailchimp</u>, <u>Google</u> and <u>TutorCruncher</u>.

5. What Your Rights Are

- 5.1 You are not required to provide any personal data to us. However, your failure to do so may affect our ability to provide you with the services, engagement or employment, as applicable, that you request. For example, we are unable to contact you with information about an activity if you do not provide your e-mail address.
- 5.2 We respect your privacy rights and provide you with reasonable access to the personal data that you may have provided us. If you wish to access or amend any personal data we hold about you, or to request that we delete any information about you, you may contact us at: <u>enquiries.ce@carfax-education.com</u>.
- 5.3 Please note that while any changes you request will be reflected in our databases immediately or within a reasonable time period, we may retain all information you submit for back-ups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.
- 5.4 At any time, you may object to the processing of your personal data by contacting the above e-mail address, on legitimate grounds, except if otherwise permitted by applicable law.

5.5 If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact Matthew Goldie-Scot, the Group's Data Protection Officer, at <u>m.goldie-scot@carfax-education.com</u>. You also have a right to lodge a complaint with data protection authorities.

6. How We Retain Your Personal Data and Keep It Secure

- 6.1 Internally, your data is shared with staff members responsible for managing the services you have requested and/or the activities with which you are involved. Your data may also be shared with individuals who have been selected as interns on temporary work placements who have signed non-disclosure agreements. Data is only shared with individuals who require access in order to provide the services or activities to which you have signed up.
- 6.2 We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity. Please see section 3 above for more information on how long we hold your information for.
- 6.3 We use reasonable organisational, technical and administrative measures to keep any information collected and/or transmitted to us secure. This includes the use of HTTPS with TLS (Transport Layer Security), which encrypts transmitted data, however, no data transmission or storage system can be guaranteed to be 100% secure.

7. How Often This Policy Is Reviewed and Updated

7.1 We keep our data protection policy under regular review and we will place any updates on our websites, as applicable. This privacy policy was last updated on 26/04/2018.