

## Privacy Policy

This privacy policy applies between you, the User of this Website and Tellus Education Group Ltd, the owner and provider of this Website. We take the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website. That said, we hope you will get all needed details to be assured your personal data is safe with us.

This Privacy Policy applies to your use of our “Website”. It tells you what to expect when we collect personally identifiable information about you, and what your rights are concerning the collection of your information in accordance with our obligations under the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

Before you give us your consent on the processing of your personal data or provide us with your personal data within any form on our website, we kindly ask you to read carefully this Privacy Policy, so we can be sure that you completely understand the conditions under which we would cooperate. It should also be read alongside our Terms and Conditions and our Cookie Policies.

We offer you options concerning data we process, use and share as described in this Privacy Policy and our Cookies Policy.

This is the general privacy policy for International House Trust and for the range of products and services that we provide.

### Our principles

- To comply with our obligations under the General Data Protection Act and any other relevant legislation.
- To keep your personal information and the business you do with us in strict confidence.
- To obtain your personal information lawfully and fairly.
- To maintain appropriate procedures to ensure that personal information in our possession is accurate and, where necessary, kept up-to-date.
- Where we choose to have certain services, such as data processing, provided by third parties we do so in accordance with applicable law and take all reasonable precautions regarding the practices employed by the service provider to protect personal information.

Meridian School of English is a trading name of Tellus Education Group Ltd.

TEG Ltd Ocean Studios | Royal William Yard | Plymouth | PL1 3RP | UK

Registered Office: TEG Ltd C/O Francis Clark LLP | North Quay House | Sutton Harbour | Plymouth | PL4 0RA | UK

E: [info@meridianenglish.com](mailto:info@meridianenglish.com)

[www.meridianenglish.com](http://www.meridianenglish.com)

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- To maintain appropriate technical and organisational safeguards to protect personal information against loss, theft, unauthorised access, disclosure, copying, use or modification.
- Not to sell your personal information.

### Who we are:

Meridian School of English and Tellus College are trading names of Tellus Education Group Ltd. Hereafter Tellus Education Group Ltd will therefore be referred to as 'we', 'us' and 'our'.

Tellus Education Group Ltd is, registered in England and Wales with company number 03029969, whose registered office is C/O Francis Clark Llp, North Quay House, Sutton Harbour, Plymouth, PL4 0RA, UK.

When you join us, use our websites and social media pages or when registering for any of our services, you are consenting to this privacy policy and the ways in which we use your personal data as outlined in this policy.

If you do not agree with this policy we would kindly like to ask you to refrain from providing us with your information. We value your feedback, which we will consider as we update this policy, so if you have any comments about our privacy policy and please contact: [info@tellusgroup.co.uk](mailto:info@tellusgroup.co.uk)

### What is personal data?

Personal data is defined by the General Data Protection Regulations as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

### Information we collect

Anyone can access our Website without the necessity to register an account. Therefore, limited use of the Services is always possible without the provision of your personal details (for example, browse the Website, check how we work (e.g. look through the list of our teachers, review the variety of services etc.). However, whenever you access the Website we collect log information and put cookies, by which we track your activity on the Website, including pages you have visited, the specific URLs that brought you to our Website, and links embedded on our Website that you have accessed. This information may include IP addresses, and any information collected by cookies. You can always opt out from cookies except from those, without which the Website cannot work.

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When you purchase one of our online courses and register with us as a user, we will collect the following information:

- first name, last name
- email address
- home address,
- telephone number
- credit/debit card information
- Data relating to your use of our Website and enrolment on Online Courses
- Information provided by you when you correspond with us (including via surveys)
- Information provided from third party sources, such as our Partners who may invite you to a certain course.

### Personal data we collect, why we collect it and who we share it with

We collect personal data as set out below in order to promote and provide our services.

#### Students

We collect student data in order to facilitate our teaching activities including monitoring, achievement, progression and feedback.

When collecting data for students, we may occasionally collect personal data for children. This information is normally provided to us by the parents, or by agents.

For children younger than 16 years old, the use of any of our services is only allowed with the valid consent of a parent or a guardian. If we become aware that we process information of a child under 16 years old without the valid consent of a parent or guardian, we reserve the right to delete it.

#### Agents

We collect limited personal data from our agents to enable us to keep in contact about opportunities for their clients to use our services. We also provide agents with data about their clients' participation of our programme.

#### Course Applicants (including in person/telephone enquiries)

We collect Course Applicant data in order to ensure smooth conversion of this data once the application has been processed. We collect limited personal data from enquirers to enable us to provide our prospective clients with accurate and useful information regarding our services.

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## Website visitors

We use cookies on our websites for two reasons:

- **Statistical:** anonymous information about how many users we have, how often they visit, which pages are visited most frequently, and by what types of users, in what countries.
- **Technical:** personal information to remember a visitor within the same browsing session and to ensure that the interface is adapted to their device (e.g. when you click 'remember me')

You can turn off cookies, but if you do, you may not be able to use all the features on our websites and we may not be able to store your preferences (such as whether you have accepted cookies). This will not prevent other cookies being placed on your device unless you adjust your settings.

For more information about the cookies we use and how to manage them, including how to turn them off, please view our cookie policy.

By using our websites, you are agreeing to the use of cookies as described.

## How we collect this information about you:

We collect the information listed through different channels:

- Digital/online forms e.g. for class participation
- Phone calls and correspondence
- Visiting our websites and/or social media pages

## How we use your information

We process your personal data in accordance with our obligations under applicable data protection laws and regulations, for the following reasons:

### Contract

- To provide you with details of services that you have requested or that are strongly related to services that you have used
- To provide you with a service.
- For internal administrative purposes, e.g. updating records or implementing credit control.
- To manage your Learner account;
- To provide technical support to you;

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## Legitimate interest

- To provide you with details of events and services that we think may be of interest to you.
- To notify you of changes to our services.
- To send you email notifications and updates about Courses you are enrolled on;
- where you are invited by an agent to enrol on a Course, to allow the that entity to enrol you on the Course, and to monitor and track your progress on the Course;
- To contact you occasionally in order to invite you to share your opinions of and experiences with us, and to publish customer reviews and ratings of our Courses on our Website or on other media channels;
- For marketing purposes, where you provide us with your consent to receive marketing communications, which may include email and/or telephone communications with information, news, and offers of Courses on our Website and third party offers;
- For creating prospective customer databases by matching demographic data from your depersonalised information with members of the general public;
- To use your information in an aggregated format to identify trends on our website and trends in our customer database. We may use this information in an aggregated and anonymous format and may share this information with third parties;
- We use cookies to collect information relating to your use of the Website to enable, maintain and improve the functioning of our Website and the quality of our products and services. For more information, please see our Cookies Policy

## Vital Interest

- To meet our safeguarding obligations

## Whom we may share your information with

For the above purposes, we may share your information with the following third parties. Please note that any third parties' use of your personal data will be governed by their own privacy policies and give rise to separate obligations under applicable data protection laws. We suggest that you carefully review any third party privacy policies that may apply to you.

Third parties that may receive your information include:

- Our payment services providers Stripe, PayPal, AliPay and WeChatPay
- Customer relationship management service providers (which allows us, for example, to send personalised email communications to you);
- Our file storage and management service providers;
- Any Tellus Education Group Ltd. company (in a pseudonymised format for analytical purposes only);

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- If we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets, provided that they continue to use your information in accordance with the terms of this Privacy Policy;
- If all, or substantially all of our assets, are acquired by a third party provided that they continue to use your information in accordance with the terms of this Privacy Policy, in which case information held by us will be one of the transferred assets; and
- Any entity to which we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other legal requirements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### How long we keep your personal data

We only keep your information for as long as we need it to provide you with the services or information you have requested, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with those that have asked us not to.

Our general retention period is five years after a record has ceased to be active.

### Access to your information

We allow our staff to access and use your information for the purposes for which you have provided it to us.

Any third-party agencies engaged by us to carry out our services are carefully selected and required to demonstrate compliance to UK data protection legislation.

We will only share your personal information with third parties where it is directly relevant to the services you have requested. We require third parties to treat your data with the same level of care as if we were handling it directly.

We may also disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation, or in order to enforce or apply any agreements, or to protect the rights, property or safety of Tellus Education Group Ltd.

### Your consent

While we will seek consent at the point of collecting your data, in some cases we may process data without consent when we are legally allowed to do so and where it is in our legitimate interests.

You can withdraw your consent at any time.

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If you request not to receive any further contact from us, we will keep a record, so we know not to contact you in the future. This will include your name, organisation and preference not to be contacted.

## Your rights

We understand that privacy and data are sensitive and important. You have a number of rights in relation to your data. These are:

- The right to be informed: this privacy policy details how and why we collect, store and use your personal data
- The right of access: you have the right to access the data and information we hold about you.
- The right to rectification: we want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by contacting us using the contact details below
- The right to erasure: you can request that we delete the information we hold on you by contacting us using the contact details below.
- The right to restrict processing: you can let us know how you want us to use your data by getting in touch with us using the contact details below.
- The right to data portability: you have the right to request your data be provided in an easy to use format to another supplier.
- The right to object: you can opt out of hearing from us at any point by contacting us using the contact details below.

In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the 'Legal information and how to contact us' heading below.

You may unsubscribe from certain email communications by following the Unsubscribe link in the email communication itself. You may also email us at [info@meridianenglish.com](mailto:info@meridianenglish.com) in order to access, correct, or update your personal information on our systems. We will answer every email as promptly as possible. You have the right to delete your account. To do so, please contact [support@meridianenglish.com](mailto:support@meridianenglish.com)

Similarly, if we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it

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affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have any privacy-related questions or unresolved problems, you may contact us using the information provided below.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

### Legal information and how to contact us

The controller of personal data is the company that determines the purpose and means of processing your personal data. The controller of your personal data for marketing purposes is Tellus Education Group Ltd.

You have a right to access the personal information we hold about you and in certain circumstances to be provided with a copy of that information. You can request this by using the contact details below.

If at any time you do not wish to receive further information about us and our services, or you wish to change your contact details or preferences, please contact us using the details below. Please note that we will keep some basic contact information to ensure we don't contact you again in the future. If we completely erased your records, then we wouldn't be able to ensure we don't contact you again in the future.

Data Protection Officer, Tellus Education Group Ltd, Ocean Studios, Royal William Yard, Plymouth, PL1 3RP, UK.

Requests will be dealt with and responded to within 30 days.

If you are unhappy with the way in which your personal data has been handled you are entitled to make a complaint to [info@tellusgroup.co.uk](mailto:info@tellusgroup.co.uk)

### Storage and Security of your personal data

We store your data on two different platforms:

- on-premises server
- public cloud-based storage

We use appropriate business systems and procedures to protect and safeguard the personal data you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorised personnel are permitted to access personal data in the course of their work.

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Any payment transactions will be encrypted using SSL technology (SSL stands for 'Secure Sockets Layer' and creates encrypted connections).

Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the safety of your data during transmission, but once we receive your data it will be used and stored securely.

When you register, we will ask you to choose a password which enables you to access the Online Courses and Content. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.

In addition, we (or third parties acting on our behalf) may also store or process information that we collect about you in countries outside the United Kingdom or outside the European Economic Area, which may have different standards of data protection than in the UK. We have put in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information. However, whilst we have used our best efforts to ensure the security of your data, it is your responsibility to make an informed decision to avail yourself of our services and products or if your concerns about the handling of data require you to refrain from using our Website.

### Data Retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### Children

We take seriously our legal obligation to protect the privacy of children, please see our [Children Safety and Safeguarding Policy](#) and our [Children's Privacy Policy](#).

### Cookies

The Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website or Online Courses may no longer be available to you.

For more information about cookies, including further details as to what they are and how to refuse them, please see our [Cookies Policy](#).

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## Updating this Privacy Policy

We may change or update this Privacy Policy from time to time, to comply with the law, in accordance with best practice, or to meet our changing business requirements, so please check this page regularly to ensure that you are happy with any changes. By continuing to access the Website, use the Online Courses and Content, and/or provide content in connection with the Online Courses and Content, you will be deemed to have accepted the Privacy Policy as amended at the time of your access and use.

This page was last updated on 21 April 2022

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