

RODO in E-Kaliteri

From 25th May 2018 come into force the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (referred to hereinafter as “the Regulation”). The Regulation introduces a number of amendments to obligations of entities processing personal data. Its aim is to extend and harmonize the rights to the protection of personal data of citizens of the European Union.

WHO IS THE ADMINISTRATOR OF DATA?

The administrator of your personal data is E-caliteri LTD, based in the United Kingdom, Unit 4e, Enterprise Court, Farfield Park, Manvers, Rotherham, South Yorkshire, England, S63 5DB registered at 09399287, e-mail address info@e-polyglots.com hereinafter referred to as the School.

WE PROCESS YOUR DATA FOR THE FOLLOWING PURPOSES:

- a. related to the performance of the contract that binds us, or in connection with the activities undertaken by You in connection with the conclusion of the contract (Article 6 paragraph 1 point b of the Regulation),
- b. to fulfill all legal obligations imposed on us in connection with the cooperation undertaken (Article 6 paragraph 1 point c of the Regulation), this aim is related to legal obligations to store specific documents for the time specified in the legal provisions,
- c. for archival purposes (evidence) to secure information in the event of a legal need to prove facts, which is our legitimate interest (Article 6 paragraph 1 point f of the Regulation);
- d. in order to possible arrangement, investigation or defense against claims, which is our legitimate interest (Article 6 paragraph 1 point f of the Regulation);
- e. for a specific purpose based on your consent to processing Your personal data in one or more purposes (Article 6 paragraph 1 point a of the Regulation) – if You consent to the use of your personal data, the content of this consent will specify in which specific purpose we will process this data.

Please be advised that in the above-mentioned purposes we will not perform profiling, ie automated analysis of Your data and prepare predictions about preferences or future behaviors (profiling means, for example in the case of marketing profiling, which offer may be the most interested based on your choices earlier). In case of a change of decision regarding profiling You will be informed about this by completing this information and sending it to the e-mail address provided by You.

WHAT DATA SHOULD BE PROVIDED TO US?:

To conclude a contract, we require to provide the data on the contract form (if You do not provide them, we will not conclude the contract). In addition, we can request optional data that does not affect the conclusion of the contract (if we do not receive it, we will not be able to, for example, call the contact number). During the contract period, when we providing services, we enter into Your other data. The appearance of Your personal data with us is a consequence of our services that You use. When concluding a contract, You can additionally for example, order services not previously covered by the contract. If it will require the use of Your data in a manner other than described in this document, we will complete the missing information and

provide it, if possible, before obtaining the data. In the remaining scope, the information on data processing contained in this document will remain valid

WHO CAN WE MAKE YOUR DATA AVAILABLE TO:

- a. Public authorities, to the extent that they do not receive data as part of a specific legal proceeding (depending on the competence basic);
- b. Entities that process your personal data on behalf of the School based on the contract for entrusting the processing of personal data concluded with the School (the so-called data processor). These will be trusted partners - the list of trusted partners can be found at <https://e-polyglots.com/pdf/dokumenty/list-of-trusted-partners.pdf>.
- c. External data controllers (the so-called Parallel Administrator, to whom the data are made available, eg. attorneys-in-law and solicitors, entities conducting courier or postal activities, entities purchasing receivables - if You do not pay our invoices on time);
- d. Recipient in the third country or international organization, if we make a decision, about such transfer

FOR WHAT DURATION WE WILL STORE YOUR PERSONAL DATA?

Your personal data will be processed for the period necessary to implement the purposes of processing indicated in point 1 and :

- a) within the scope of the contract concluded by You with the School for a period until its completion, and after that: for a period required by law, e.g. for storing certain accounting records and specific data in accordance with tax regulations; for a period resulting from the legitimate interests of the School (i.e. a limitation period to secure any claims);
- b) in the scope of fulfilling the legal obligations incumbent on the School in connection with conducting legal activities and the implementation of concluded contracts, for a limited period of time until the School fulfills these obligations;
- c) in the internal administrative purposes, for a period of time before the legitimate interests of the School forming the basis of this processing have been fulfilled or until You object to such processing;
- d) in the scope of marketing and promotion of services offered by the Administrator - for a period of objection to data processing;
- e) within the scope of expressed consent - until its withdrawal.

ENTRUSTING THE PROCESSING OF PERSONAL DATA TO THIRD COUNTRIES

We do not transfer full data outside Poland, the European Union and the European Economic Area (including the European Union, Norway, Liechtenstein and Iceland). However, it may turn out that during the term of the agreement we will decide to transfer data outside the EEA - only to the extent permitted by law. Such a transfer will only occur if a third country provides adequate protection for your personal data in accordance with the Privacy Shield standards maintained by the U.S. Department of Commerce. You will be notified of this by email.

YOU ARE ENTITLED TO THE FOLLOWING RIGHTS:

- a. the right to access to your personal data processed by us on the basis of Article 15 of the Regulation;
- b. the right to refute the entrusted personal data, including its correction (Article 16 of the Regulation);

- c. the right to remove your personal data from our systems, also known as 'the right to be forgotten' - if you think that there is no basis for us to process of your personal data, you are entitled to demand its removal on the basis of the Article 17 of the Regulation;
- d. the right to limit the processing of the personal data – you can request us to limit the range of processing your personal data to storing or accomplishing agreed activities. If you think that we process your incorrect data or process them unjustifiably or you don't want us to remove them because of the need to establish, investigate or defend your claims or in time of your objection to personal data processing (Article 18 of the Regulation);
- e. the right to data transfer – you have the right to receive from us your personal data, based on a contract or your consent, applicable in a structured, commonly used readable format (eg. 'CSV' format). The basis of this right is to have your personal data in electric form. Otherwise (e.g. in case we operate on your data consolidated in the paper form) , you won't be entitled use the right mentioned above. You are entitled to demand sending your personal data directly to other entities (Article 20 of the Regulation);
- f. the right to withdraw your consent to processing your personal data (at any time you are entitled to withdraw your consent to processing your personal data processed on the basis of your approval) – Article 7 paragraph 3 of the Regulation.

To exercise these rights, please send a request to info@e-polyglots.com or E-Kaliteri address or submit it in person to Unit 4e, Enterprise Court, Farfield Park, Manvers, Rotherham, South Yorkshire, England, S63 5DB.

THE RIGHT TO VOICE THE OBJECTION

Notwithstanding the above-mentioned rights, at any time you are entitled to voice the objection to the processing of your personal data (including the profiling if provided) for the direct marketing purposes – Article 21 of the Regulation. After receiving the proper application on this matter, we are obliged to stop processing of your personal data for such a purpose. In specific circumstances, at any time you are entitled to voice the objection to the processing of your personal data (including the profiling, if provided), if the basis for the processing of your personal data is our legitimate interest or public interest - Article 21 of the Regulation. In that case, after considering your application, we will not be entitled to process your personal data within the scope covered by the objection, unless we prove that they exist: Important legally justified basis for the processing of personal data that are legally superior to your interests and rights; or Legal basis for establishing, investigating or defending claims.

INFORMATION ABOUT THE VOLUNTARY ENTRUSTMENT OF THE DATA

As far as data processing is needed to conclude and implement a contract with the School, the entrustment of your personal data is obligatory for its conclusion. The entrustment of your personal data shall be treated as voluntary, but the failure of providing such data will cause a lack of possibility to conclude and implement the contract.

INFORMATION ABOUT CHANGING THE DATA PROCESSING PURPOSES BY THE ADMINISTRATOR

If the School decided to process your personal data for a different purpose than the previous ones in which your data has been collected before, we will inform you about the new purpose, as well as provide other relevant information about your data processing.

THE CONSENT

If the use of your data is not necessary for the execution of the contract, fulfillment of any legal obligation or does not constitute our legitimate interest, we can ask you for your permission to specific purposes of using your data. Such consent can enable, for example, providing data to other entities for the purpose of their promotional campaigns or automatic decision-making based on your data and on your request or telephone / e-mail contact to provide information about the execution of the contract. You are entitled to withdraw your consent at any time (this will not affect the legality of using your personal data before your withdrawal of such a consent). Withdrawal of consent shall be effected by appropriate information sent to the e-mail address info@e-polyglots.com. If you consent to the use of your data, the content of this consent will specify the purpose for which we will process your data. Your consent to the processing of your data will only be used for purposes for which the other processing conditions set out in points (a) to (e) above do not apply.

THE RIGHT TO COMPLAIN

If in your opinion the processing of personal data by E-Kaliteri LTD violates the Regulation, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) United Kingdom. If you have any questions, please contact info@e-polyglots.com