Privacy Policy of Bayswater Education Limited

Bayswater Education Limited collects some Personal Data from its Users.

Owner and Data Controller

Bayswater Education Limited, 167 Queensway, London, W2 4SB, UK

Owner contact email: privacy@bayswater.ac

Types of Data collected

Among the types of Personal Data that Bayswater Education Limited collects, by itself or through third parties, there are: Cookies; Usage Data; first name; last name; gender; date of birth; phone number; profession; address; country; email address; various types of Data; city.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.
Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Bayswater Education Limited.
Unless specified otherwise, all Data requested by Bayswater Education Limited is mandatory and failure to provide this Data may make it impossible for Bayswater Education Limited to provide its services. In cases where Bayswater Education Limited specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.
Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.
Any use of Cookies – or of other tracking tools — by Bayswater Education Limited or by the owners of third-party services used by Bayswater Education Limited serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Bayswater Education Limited.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.
The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Bayswater Education Limited (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users’ consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent

activity, as well as the following: Interaction with external social networks and platforms, Contacting the User, Analytics, Advertising, SPAM protection, Heat mapping and session recording, Managing landing and invitation pages and Managing contacts and sending messages.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Bayswater Education Limited, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.
Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User’s interests and behavior, including those detected outside Bayswater Education Limited. For more information, please check the privacy policies of the relevant services.
Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC. This service uses the “DoubleClick” Cookie, which tracks use of Bayswater Education Limited and User behavior concerning ads, products and services offered.
Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Universal Analytics) (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of Bayswater Education Limited, to prepare reports on its activities and share them with other Google services.
Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Google Analytics (Universal Analytics) with anonymized IP (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of Bayswater Education Limited, to prepare reports on its activities and share them with other Google services.
Google may use the Data collected to contextualize and personalize the ads of its own advertising network.
This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Contacting the User

Contact form (Bayswater Education Limited)

By filling in the contact form with their Data, the User authorizes Bayswater Education Limited to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: address; city; country; date of birth; email address; first name; gender; last name; phone number; profession; various types of Data.

Heat mapping and session recording

Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.
Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.
Hotjar honors generic „Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.

Personal Data processed: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – Privacy Policy – Opt Out.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of Bayswater Education Limited.
The interaction and information obtained through Bayswater Education Limited are always subject to the User's privacy settings for each social network.
This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.
It is recommended to log out from the respective services in order to make sure that the processed data on Bayswater Education Limited isn't being connected back to the User's profile.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

YouTube button and social widgets (Google Inc.)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Inc.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.
These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Mailchimp (The Rocket Science Group LLC)

Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.

Personal Data processed: email address; first name; last name.

Place of processing: United States – Privacy Policy.

Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.
Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

Instapage (Instapage, Inc.)

Instapage is a landing page management service provided by Instapage, Inc., that allows Bayswater Education Limited to collect the email addresses of Users interested in its service.
Instapage allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data processed: Cookies; email address; Usage Data.

Place of processing: United States – Privacy Policy.

SPAM protection

This type of service analyzes the traffic of Bayswater Education Limited, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC.
The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

Application Form

The information you give us may include your name, address, telephone number(s), email addresses(s), date of birth, gender, country of birth, nationality, citizenship country, passport details, academic and English language attainments, disabilities, health information, including illnesses, allergies and dietary Information, contact details of your next of kin, your reasons for studying English, your profession . We may also collect information regarding payment of fees and your ability to meet the requirements of obtaining clearance to enter the UK, Canada, France, South Africa and Cyprus, such as previous refusals, ability to fund studies and historic visits to these countries.

During your studies

During your course we collect information on the progress you make during your course including your test results, results of any public exams, the dates you attend class and the dates on which you are absent from class and your attendance percentage. We will also track your progress via a Student Learning Plan.

About Bayswater Education

Bayswater Education Limited is a registered company with offices in London located at 167 Queensway, London W2 4SB.

Data Security

When you give your personal data to Bayswater Group, we will process that data in accordance with our responsibilities under the Data Protection Act 1998, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other relevant legislation.

We will keep your data safe and secure. To prevent unauthorized access, maintain data accuracy and ensure the correct usage of information, we monitor and adjust our physical, electronic and managerial procedures to safeguard and secure your personal data while in our care, or in the care of any outside suppliers with whom we may contract to process your data on our behalf. Any outside suppliers are under strict contractual terms to mirror the security policies that we currently have in place.

We strive to ensure the security, integrity and privacy of personal information submitted to our sites, and we review and update our security measures in light of current technologies. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. However, we will endeavor to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems. In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for events arising from unauthorized access to your personal information.

We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

Management of your Data

If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Manager, Bayswater College, 167 Queensway, London W2 4SB or email us at bookings@bayswater.ac.

We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.

You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by emailing us at bookings@bayswater.ac. This Privacy Policy applies to Personal Data we hold about individuals. It does not apply to information we hold about companies and other organisations.

If you would like access to the Personal Data that we hold about you, you can do this by writing to us at address Bayswater College, 167 Queensway, London W2 4SB or email us at bookings@bayswater.ac.

We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it promptly. Please write to us at address Bayswater College, 167 Queensway, London W2 4SB or email us at bookings@bayswater.ac.

At any time, you can request from us the usage of your personal data by sending an email to bookings@bayswater.ac.

At any time you can request from us to stop receiving emails from us using the following email bookings@bayswater.ac.

Mode and place of processing the data

Methods of processing:

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration)

or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

Place:

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

Retention Time:

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

Use of the Data:

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Re marketing and behavioral targeting, traffic optimization and distribution, Contacting the User, Content commenting, Interaction with external social networks and platforms, Analytics, Displaying content from external platforms, SPAM protection, Hosting and back end infrastructure, Managing contacts and sending messages, Managing landing and invitation pages, Infrastructure monitoring and Interaction with live chat platforms.

We use the information collected primarily to process the task for which you visited the website. All reasonable precautions are taken to prevent unauthorized access to this information.

Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfill these purposes:

1.To help us to identify you when you contact us.
2.To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the Personal Data you have provided and/or any information we hold about you and Personal Data from third party agencies (including credit reference agencies).
3.To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future.
4.To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information.
5.To help to prevent and detect fraud or loss.
6.To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners unless you have previously asked us not to do so.
7.We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
8.We may check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this.
9.We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.
10.We may allow other people and organisations to use Personal Data we hold about you in the following circumstances:
11.If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.
12.If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
13.Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and that they have not objected to such use of their Personal Data.

In connection with any transaction which we enter into with you:

1.We, and other companies in our group, may carry out credit and fraud prevention checks with one or more licensed credit reference and fraud prevention agencies. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.
2.If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.
3.If you need details of those credit agencies and fraud prevention agencies from which we obtain and with which we record information about you, please write to our Director at 167 Queensway, London W2 4SB.

Types of Communications

By submitting your email address you are consenting to receive the particular piece of information you requested, as well as allowing us to send you appropriate and useful communications. This includes, but is not limited to; invitations to our events and webinars, our latest assets (blog posts, whitepapers, guides, reports, info graphics, videos and case studies) and promotional offers on software and services. We would also like to keep you abreast of the charity events and initiatives we partake in.If you are a customer of Bayswater College, you will also receive regular updates. These updates will highlight information relevant to the services we deliver.

Types of data collected

We may collect any or all of the information that you give us depending on the type of transaction you enter into, including your name, address, telephone number and email address, together with data about your use of the website. Other information that may be needed from time to time to process a request may also be collected as indicated on the website.

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage data, first name, last name, phone number and email address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

The Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

All Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without any consequences on the availability or the functioning of the service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

We may collect Personal Data about you from a number of sources, including the following:

1.From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.
2.From you when you contact us with an inquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.
3.From documents that are available to the public, such as the electoral register.
4.From landing pages, chat platforms, emails and online forms.

Automated decision-making

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. Bayswater Education Limited may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. Bayswater Education Limited adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User’s explicit consent, where such consent is required by the law. Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.
The rationale behind the automated decision making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- to reduce the risk of User's failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within Bayswater Education Limited, Users can check the relevant sections in this document.

Consequences of automated decision-making processes for Users and rights of Users subjected to it

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.
In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;

- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing.

To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

Cookie Policy

Bayswater Education Limited uses Trackers. To learn more, Users may consult the Cookie Policy.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another

controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running Bayswater Education Limited and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").
This section applies to all Users in Brazil (Users are referred to below, simply as "you", "your", "yours"), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.
This part of the document uses the term "personal information" as it is defined in the **LGPD**.

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.
In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.
You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.
In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Bayswater Education Limited or the related Services.
The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Bayswater Education Limited may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Bayswater Education Limited and any third-party services may collect files that record interaction with Bayswater Education Limited (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Bayswater Education Limited and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Bayswater Education Limited (or third-party services employed in Bayswater Education Limited), which can include: the IP addresses or domain names of the computers utilized by the Users who use Bayswater Education Limited, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Bayswater Education Limited who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Bayswater Education Limited. The Data Controller, unless otherwise specified, is the Owner of Bayswater Education Limited.

Bayswater Education Limited (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Bayswater Education Limited as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User’s device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to Bayswater Education Limited, if not stated otherwise within this document.

Latest update: October 24, 2022