

IJ Tours Ltd t/a “International House Manchester or IH Manchester”

## Privacy Policy

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## 1. Introduction

This Privacy Policy governs the manner in which IJ Tours Ltd, trading as IH Manchester, collects, uses, maintains, and discloses information from or about you when you use our products and services, enrol and attend a programme or use the websites and newsletter sites. (“Sites”). This Privacy Policy applies to the Site and all products and services offered by IH Manchester. IJ Tours is a UK based company, working with individuals not only from the UK but from countries outside the UK. We aim to comply materially with applicable privacy laws and regulations in each of the countries in which we do business. IJ tours Ltd are a controller and processor of data.

Because protecting your privacy is important to us, IH Manchester has implemented this Privacy Policy, along with a number of additional notices specific to clients, staff and host families, so that you fully understand:

- What information is held by IH Manchester?
- How the information will be used.
- With whom the information will be shared (if anyone).
- How to opt out of e-mail updates.
- How to exercise your legal rights regarding your personally identifiable information (“PII”) (including how to update or correct inaccuracies).
- What safeguards are in place to protect your information?
- Other information about your privacy.

By using our Sites or any of the products or services offered by IH Manchester, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Sites, products or services. If you have questions regarding your privacy rights and data we hold or may hold on you if you are going to enter into a contract or use of sites or services, please contact us on [privacy@ihmanchester.com](mailto:privacy@ihmanchester.com) for more information.

## 2. What information is held by IH Manchester?

IH Manchester limits the collection of PII to that which is relevant for the intended business and legal purpose as described in Section 3 below and outlined in our policy notices. IH Manchester will not store, access, transmit, retain or otherwise use your PII in any way that is incompatible with the purposes for which it has been collected or stored as described in this Privacy Policy, unless you authorized such alternative use in writing.

### 2.1. Registration Information

If you are enrolling onto a programme at IH Manchester you will provide PII as requested in our booking form and outlined in our student data protection policy.

## 2.2. Online Surveys

IH Manchester values opinions and comments from students so we may conduct online surveys. These surveys are entirely optional for all students. Typically, the information is aggregated and used to make improvements to IH Manchester products and services and to develop appealing content, features and promotions for customers. Survey participants are anonymous unless otherwise stated in the survey.

## 2.3. IP Addresses

IH Manchester collects IP addresses to help diagnose problems with our servers and for system administration.

## 2.4. At School Collection

IH Manchester collects additional information on students on school registration and induction. This is normally for safety of our students and staff along with legal requirements in the UK. Please see privacy notice for students/staff/hosts for more information.

## 2.5. Server Logs

Like many other websites, our servers may automatically record information about your IP address, which ads you click on, the page that directed you to our Site, and the browser type used while accessing our Site. A server log stores the information collected so it can be analysed for the purposes set out in Section 4 below.

## 2.6. Other Sources of Personal Information

You may provide information to us when you telephone us, in messages you send to us, for example, via the “contact us” section of our website, when you log on as a member or by interacting with any of our social media platforms, for instance by liking and sharing our posts on Facebook or Twitter. Please ensure you read the privacy policies in relation to your social media accounts as we cannot be held responsible for their uses of your PII.

## 2.7. Non-Personally Identifiable Information

We may also collect aggregated and anonymous information that does not identify an individual, such as the date and time a given device/browser visited the Site, the web browser used, and the visited page that directed the user to our Site. This Non-Personally Identifiable Information (“Non-PII”) is collected and analysed to determine how a user may have been directed to our Site, their interests in our products and services, and how to improve our Site. We may also collect information about user activities on the Sites and other websites for the purpose of generating advertisements according to assumed or stated user interests and preferences. This may result in our ads being displayed on participating websites based on a user’s browsing activity. This is achieved by allowing third party advertising companies to access things like cookies, IP addresses, and server logs. Some Non-PII may be combined with a user’s PII to further

enhance that user's experience while on the Site. In such a case, or in cases where any of the information above is deemed to be PII under the laws of the particular jurisdiction that information becomes PII and will be handled in accordance with this Privacy Policy.

## 2.8. Credit Card/Payment Information

You may provide IH Manchester with credit-card or payment information through our online booking or PayPal. This information is not retained by IH Manchester after a payment has been made.

## 3. PII – Your rights

### 3.1. Requesting PII

As stated above, you have a right to access the personal data that we hold on you. To exercise this right, you should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge may be applied.

Further information on making a subject access request is contained in our Subject Access Request.

### 3.2. Updating PII

IH Manchester shall promptly correct or complete any PII found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted on your file. Requests to update, correct or augment PII can be made by contacting us at the [privacy@ihmanchester.com](mailto:privacy@ihmanchester.com)

### 3.3. Blocking or requesting erasure of your PII

If you no longer want to use IH Manchester services, you can ask us to delete and/ or block your PII from being used again. Whether and the extent to which we can honour such requests will depend upon the nature of our relationship with you and may vary in accordance with applicable law. Requests to block your PII from being used again or to delete PII can be made by contacting us as set forth in Section 12 below. However, please note that we may need to retain certain information, for example for legal or administrative purposes, such as record keeping, maintenance of opt-out requirements, processing claims or detecting fraudulent activities. We will retain information in accordance with the provisions of Section 4.2 below.

### 3.4. Special offers and promotions

As customers of IH Manchester we would like to provide you with updates about discounted availability, special offers, new services and products of ours which may be of interest to you and to provide you with details of third parties whose products, services and special offers you might also be interested in.

Depending on your location (reflecting applicable law), you may have been asked to indicate preferences regarding the receipt of such information from us, including consent as to the means by which you would like to such receive it.

Wherever you are located (and reflecting any preferences you may have expressed) you may receive such information by letter, e-mail, telephone or any other reasonable means of communication. If you do not want to receive these updates and to understand more about other unsubscribe options, you may contact us as set forth in Section 12 below.

Alternatively, for email communications you can opt-out by clicking the unsubscribe button at the bottom of our newsletters.

## 4. How will the information be used?

### 4.1. Use of the information

We may use the information we collect from or about you in the following ways:

- To verify your credentials and/ or identity you
- To carry out our obligations to you.
- To allow you to complete bookings, be employed and make payments.
- To manage your time with us, service your requests and administer our relationship with you.
- To allow us to contact you including for customer service and to confirm requests, payment and other transactions with us.
- To provide you with assistance in the event you need our help via telephone, email or in person.
- To enable us to perform our legal and regulatory obligations as a responsible educational provider and employer.
- To personalise your experience and to allow us to deliver the type of service you require.
- To improve our Sites in order to better serve you.
- To allow us to provide you with better service in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- For marketing purposes – for more information on this please see [Section 3.5](#).

- To quickly process your transactions and bookings.
- To ask for ratings and reviews of services or products.
- To follow up with you after correspondence (live chat, email or phone inquiries).
- To notify you of important information
- To develop promotions and product improvements.
- For our reasonable business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from various authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; or (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## 4.2. Retention of your PII

We will retain your PII for as long as necessary in order to fulfil the purposes set forth in this Privacy Policy. We will retain and use this PII only as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and then delete it.

Even if you request to close your account, keep in mind that deletion by third parties to whom the information had been provided may not be immediate and that the deleted information may persist in backup copies for a reasonable period of time (but will not be available to others).

Our retention periods are set out in our privacy notices for relevant subjects.

## 5. Who will the information be shared with, if anyone?

### 5.1. Agents

We may share some of your PII with your agent, with consent from you. This will be done in relation to providing you and the agent with the services booked with us and us fulfilling our contract with you.

### 5.2. Accreditation Bodies

As an accredited school IH Manchester undergoes various external inspections from accreditation bodies. These such bodies at the time of policy writing are NCFE, Accreditation UK and IH world. During these external inspections details may be shared for the purpose of accreditation of the school to demonstrate compliance.

### 5.3. Other Companies

IH Manchester does not share PII with any other companies unless it is in direct relationship with your employment, programme or interaction with us. Please see additional data protection policy for specific subjects.

### 5.4. Customs and Immigration Authorities

Please also be advised that we may need to give cross border control agencies access to customer data. Accordingly, any information held about you and your travel arrangements may be disclosed if required by law to the customs and immigration authorities of any country in your itinerary.

### 5.5. Other Third Parties

We do not sell customer names or other PPII to other third parties for their marketing purposes and have no intention of doing so in the future.

### 5.6. Authorities Permitted By Law

We may disclose your information to law enforcement and other governmental authorities insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud. IH Manchester may also disclose information, if, in good faith, we believe that disclosure is necessary or advisable including, without limitation, to protect the rights or properties of IH Manchester or in order to identify, contact or bring legal action against someone who may be causing interference with our rights or business, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

### 5.7. Corporate Transactions

We may disclose your information to a third party who acquires any part of IH Manchester itself, whether such acquisition is by way of merger, bankruptcy, consolidation or purchase of all or a substantial portion of IH Manchester's assets.

## 6. Cross-border Data Transfers

In connection with these transfers of PII, your PII may be subject to privacy laws that may not provide the same protection as your country of residence. For example, government entities in the United States and other countries may have certain rights to access your PII. IH Manchester limit any PII that is transferred outside of the UK, however with consent may need to do so at times for purpose of contract and safety to students and customers.



Following the UK's exit from the EEA/EU IHM have appointed a GDPR representative within the EU to work with on data requests. IHM's GDPR representative in the EEA/EU and contact details are: -

<b>EEA / EU Representative Office</b> Attention: Data Protection Officer Telephone: +39 064 520 0328	<b>Italy Office</b> Gallery Teachers Via costa smeralda, 33 07021 - Arzachena-SS Italy	<b>Spain Office</b> Gallery Teachers Av. Arquitecto Gómez Cuesta, 16, piso 9-3, 38650 Arona, Santa Cruz de Tenerife Spain
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## 7. Browser Data, Cookies and other Web Technologies

### 7.1. Cookies

Like many websites, our Sites uses automatic data collection tools, such as cookies, to improve your user experience. Cookies are elements of data sent to your browser which can then be stored on your computer. We use cookies to:

- Understand and save your preferences for future visits.
- Keep track of advertisements.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

Although you may disable cookies in your browser and still access and use this Site, disabling cookies may prevent you from taking advantage of certain features on the Site.

### 7.2. Google Analytics

This Site uses Google Analytics ("GA") to collect data activity. GA may be used for Display Advertising.

Visitors can control the information provided to Google and opt out of certain ads provided by Google by using one of the methods set forth in <https://policies.google.com/privacy/partners> or use the Google Analytics opt out browser add-on at <http://tools.google.com/dlpage/gaoptout>. Visitors can also opt-out of GA for Display Advertising and customize Google Display Network ads by changing the ad settings at the following link: <http://www.google.com/policies/technologies/ads>.

This Site also uses Remarketing with GA to advertise online. Third-Party vendors, including Google, may show ads on websites across the internet. This Site and third-party vendors, including Google, use first-party cookies (such as the GA cookie) and third-party cookies (such as the DoubleClick cookie) together

to inform, optimize, and serve ads based on someone's past visits to our Site; report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to this Site.

## 7.4. Choices regarding your information

You may opt-out from receiving e-mail marketing communications from us by using the unsubscribe function present in all e-mail communication. To opt-out from receiving all marketing communications from us, please contact us as set forth in [Section 12](#) below.

You can understand which third parties have currently enabled cookies for your browser or mobile device and how to opt-out of some of those cookies by accessing the Network Advertising Initiative's website at <http://optout.networkadvertising.org> or the Digital Advertising Alliance's website at <http://optout.aboutads.info> or, if you're located in the European Union, at [www.youronlinechoices.eu](http://www.youronlinechoices.eu) from your browser. For more information on mobile specific opt-out choices, please visit [www.networkadvertising.org/mobile-choices](http://www.networkadvertising.org/mobile-choices).

See also [Section 7.2](#) for specific opt out options for Google services.

These opt-out mechanisms rely on cookies to remember your choices with respect to ad-serving on websites. If you delete your cookies, use another computer or device, or change browsers, you will need to repeat this process. In addition, opting out of interest-based ads will not opt you out of all ads, but rather only those ads that are personalized to your interests based on activities observed on our Site and/or web sites or mobile apps not owned and operated by IH Manchester.

## 7.5. Do Not Track Requests

Some web browsers may let you enable a "Do Not Track" feature that sends signals to the website you visit, indicating you do not want your online activities to be tracked or engage in other types of data collection. These are segments of computer code that communicate with a website similarly to cookies. However, this is different than blocking or deleting cookies, as browsers with a "do not track" feature enabled may still accept cookies. This Site does not currently honour "Do Not Track" requests. If we do so in the future, we will describe how in this Privacy Policy.

# 8. Security

## 8.1. Security Measures

IH Manchester will take reasonable measures to: (i) protect your PII from unauthorized access, disclosure, alteration or destruction, and (ii) keep PII accurate and up-to-date as appropriate. We also seek to require whom we share PII to exercise reasonable efforts to maintain the confidentiality of PII about you. For online transactions, we use reasonable technology to protect PII that you transmit to us via our Sites. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

## 8.2. Disclaimer

The transmission of PII via the internet is never completely secure. While we endeavour to protect and maintain the confidentiality of the PII you submit to us we cannot accept, and hereby expressly disclaim any liability from losses relating to the unauthorized disclosure or interception via the Internet of any information that you submit. Furthermore, our Sites may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties.

For your own privacy protection, we encourage you to limit the PII and other sensitive personal information you send to us by email. In particular, please do not send credit card numbers to us by email.

## 9. Children

You must be at least 18 years old in order to submit any information to us online. If you are under 18 years of age, please do not send any information about yourself to us online, including your name, address or e-mail address. If we discover that we have collected any PII online from a child under the age of 13 and have not received verifiable parental content for such collection, we will remove that information from our database as soon as possible.

## 10. Changes to this Privacy Policy

IH Manchester has the discretion to update or revise this Privacy Policy and associated policies at any time. If we update this Privacy Policy, we will notify you by posting the revised Privacy Policy on the Sites, and for certain revisions that materially expand the ways in which we use or share the information previously collected from you either display an alert next to the Privacy Policy or otherwise on the Sites in advance of and/or concurrently with the changes taking effect, or directly communicate with you in advance of the changes. Your continued use of the Sites, our products and services after the changes have been made will constitute your acceptance of the changes. Please do make sure you read any such notice carefully. If you do not wish to continue using the Sites, our products or services under the new version of the Policy, please cease using them and contact us with your concerns, otherwise we will interpret your continued use as acceptance of the changes.

If you have any concerns regarding our Privacy Policy or privacy practices (whether current or following an advised change) you should e-mail us as set forth in [Section 12](#) below and reference "Privacy Policy" in your subject line. IH Manchester will attempt to respond to all reasonable concerns or inquiries within one month of receipt.

## 11. Definitions

For purposes of this Privacy Policy, the following definitions shall apply:

“IH Manchester” means International House Manchester, including all activities by the holding company IJ Tours Limited and including activities with the academy under the name of IHM Football Academy.

“PII” means personally identifiable information relating to an identified or identifiable person, such as first and last name, address, email address, telephone number, and credit card information.

“Non-PII” means any other information that IH Manchester may collect about you that does not fall under PII, such as the date and time you visited the Sites, the web browser you used, the page you visited that directed you to our Sites, and your activities on our Sites.

“Privacy Policy” means IH Manchester’s Privacy Policy.

## 12. Contacting us

If you have any questions about this Privacy Policy, the practices of this Sites, or your dealings with these Sites, please contact us:

[Privacy@ihmanchester.com](mailto:Privacy@ihmanchester.com)

## Policy Review details

Policy Reviewed on:	<b>Monday 28<sup>th</sup> March 2022</b>
Policy Reviewed by:	<b>Michael Brennan</b>
Position:	<b>Director</b>
Next review date due:	<b>December 2022</b> <b>or in the event of staffing, policy, or legislative changes</b>