

## Privacy Policy

Art Focus takes the privacy of your information very seriously and is committed to protecting your personal data. This privacy policy applies to our use of any data collected by us or provided by you in relation to your use of our website, visiting our social media account, filling out forms, and correspondences to attend one of our programmes.

### The Data We Collect About You

1. We may collect, use, store and transfer different types of personal data about you which can be grouped as follows:

- ✚ **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, and medical/disability information, if applicable.
- ✚ **Contact Data** includes delivery address, email address and telephone numbers.
- ✚ **Education Data** includes your university, major, year, English level and GPA.
- ✚ **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- ✚ **Profile Data** includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- ✚ **Usage Data** includes information about how you use our website, products and services.
- ✚ **Special Category Data** including but not limited to any information about your health, dietary requirements or religion to enable us to accommodate and special requirements that you may have.

2. It is important that the personal data we hold about you is accurate and current.

Please keep us informed if your personal data changes during your time with us.

### **How is your personal data collected?**

1. Direct interactions. You may give information about your Identity, Contact and Educational Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- ✚ apply for a place on one of our programmes;
- ✚ request promotional information to be sent to you; or
- ✚ give us feedback or contact us.

2. Automated technologies or interactions.

As you interact with our website, Technical Data about your equipment, browsing actions and patterns will automatically be collected as well as, personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

3. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- ✚ Technical Data from the following parties:
  - analytics providers;
  - advertising networks; and
  - search information providers.
- ✚ Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- ✚ Identity and Contact Data from data brokers or aggregators.
- ✚ Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **Third-party links**

Our website may have links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **How Do We Use Your Personal Data?**

1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
  - ✚ To process your application including visa applications to one of our programmes.
  - ✚ To register you as a new student in one of our programmes.
  - ✚ To provide suitable accommodation, learning activities and catering.
  - ✚ To maintain academic integrity and prevent or detect academic fraud.
  - ✚ Where we need to prepare the contract, we are about to enter into or have entered into with you.
  - ✚ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - ✚ Where we need to comply with a legal obligation.
2. We will get your consent before sending third party or direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.
3. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **Disclosure of Your Personal Data**

1. We may share your personal data with the parties set out below for the purposes set out above.

- ✚ any of our affiliates - to ensure proper administration;
  - ✚ our employees, partners and/or professional advisors - to ensure we can provide suitable services;
  - ✚ third party contractors who provide services to us which require the processing of personal data;
  - ✚ relevant authorities - to facilitate the detection of crime or other duties;
- in each case, in accordance with this privacy policy.
2. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International Transfers**

We may share your personal data within Art Focus and this may involve transferring your data outside the European Economic Area (hereinafter the "EEA").

Whenever we transfer your personal data out of the EEA, we ensure an appropriate degree of protection is afforded to it by implementing suitable safeguards.

### **Data Security**

1. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your data, please let us know immediately by contacting us via this e-mail address: [admin@art-focus.org](mailto:admin@art-focus.org).
2. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data with our instructions, and they are subject to a duty of confidentiality.
3. We have put in place procedures to deal with any suspected personal data breach







and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention**

We will only retain your personal data for three years unless we are reasonably required to hold the data for a longer period to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements or in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

### **Your rights**

1. You have the following rights in relation to your Data:

-  Right to access - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
-  Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.
-  Right to erase - the right to request that we delete or remove your Data from our systems.
-  Right to restrict our use of your Data - the right to "block" us from using your Data or limit the way in which we can use it.
-  Right to data portability - the right to request that we move, copy or transfer your Data.
-  Right to object - the right to object to our use of your Data including where we use it for our legitimate interests.

2. To make enquiries, exercise any of your rights set out above, or withdraw your

consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [admin@art-focus.org](mailto:admin@art-focus.org).

3. If you are not satisfied with the way a complaint you make in relation to your Data processing, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
4. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

### **Data Administration**

1. For purposes of the applicable Data Protection Laws, Art Focus is registered as the "data controller" under Art Focus Ltd, registration number 11631931. This means that Art Focus determines the purposes for which, and the manner in which, your Data is processed.
2. Art Focus' Data Protection Officer is the Chief Technology Officer.
3. We abide by all applicable data protection and privacy legislation in force from time to time in the United Kingdom including the General Data Protection Regulation ((EU) 2016/679) and the Data Protection Act 2018 as amended from time to time.