

## PRIVACY AND COOKIES POLICY

**Summit Education Enterprise Limited** (company number 07937688) ("**SEE**" / "**we**" / "**our**" / "**us**") takes your privacy very seriously and is committed to protecting and respecting your privacy.

If you wish to contact us regarding this privacy and cookies policy, please contact us using the contact details set out below. Summit Education Enterprise Limited is the data controller. Our registered office is C/O Critchleys LLP, Beaver House, 23-38 Hythe Bridge Street, Oxford, Oxfordshire, England, OX1 2EP and our trading address is Clarendon House, 52 Cornmarket St, Oxford OX1 3HJ, United Kingdom.

This privacy and cookies policy (together with any terms and conditions that may apply to the Services you receive from us or Programmes you participate in (both as defined below)) sets out the basis on which any personal data we collect from you when you interact with us, for example, to receive our services (the "**Services**") or participate in one of our programmes (the "**Programmes**"), or that is provided by you through your use of our website (<https://www.summiteducationenterprise.com/>) (the "**Website**"), will be processed by us.

This privacy and cookies policy does not apply to websites that you may be able to access via links on the Website and/or activities offered by third parties. Please ensure you review any relevant policies on any third party websites before proceeding. SEE is not responsible for the collection or use of your personal data from these third party websites.

**Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.**

### TOPICS COVERED

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### DATA WE COLLECT FROM YOU OR ABOUT YOU AND OUR SOURCES OF THAT DATA

We will collect the following data about you:

**Data you give us.** You may give us data about you:

- when you register to receive the Services or apply to participate in the Programmes;
- when you fill out a form on the Website;

- when you report a problem or concern with the Services, Programmes or the Website;
- if you sign up to receive marketing communications from us about other services or programmes we offer;
- if you complete a survey, for example, about the Services or Programmes;
- in order to participate in the Programmes or receive the Services;
- when you provide us with feedback, opinions and / or comments regarding the Services, Programmes or the Website;
- when we arrange to work together to deliver the Services or the Programmes;
- if you contact or correspond with us (for example, by phone, e-mail or otherwise) for any other reason (for example, to request further services from us); or
- when you apply for a job with us.

**Data we collect about you.** We will automatically collect the following:

- when you use the Website, details of your usage (including the date, time, location or duration of the usage);
- if you visit the Website or, certain technical information, for example, the type of device (and its unique device identifier) you use to access the Website, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform; and
- information about your visit to the Website including the full Uniform Resource Locators (URL), clickstream to, through and from the Website (including date and time), pages you viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

**Data we collect or are provided with from third parties.** We may be given or collect personal data about you by / from third parties such as:

- universities, organisations, institutions or local authorities of cities who we partner up with in respect of the Services or Programmes;
- participants of a Programme or recipients of the Services when they provide us with information about their parents or emergency contacts as part of the application / registration progress;
- recruitment agents in respect of any vacancies or opportunities we have;
- prospective employees if they have nominated you as their personal referee; or
- from your personal referee about you.

## PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR DATA

We will process the **personal data** held about you for the purposes stated below:

Purpose of processing	Type of personal data	Legal basis for processing
<p>To enable us to process your application for the Programme / the Services and to enable you to participate in the Programme (for example, arranging accommodation for you or visits to tourist attractions for you and enabling you to participate in classes) / to receive the Services</p>	<p>Your name (including English name), photo, gender, nationality, date of birth, residential address, postal address at the university, mobile number, WeChat ID, QQ, email address, education history (for example, name of university, date of attendance and degree), level of English proficiency, your extra-curricular interests, health conditions (for example, whether any special assistance is required during a Programme or provision of the Services), dietary requirements, passport number, international travel experience and expectations for the Programme / Services</p>	<p>Performance of our contract with you (if you enter into a contract with us)</p> <p>Legitimate interest – to enable us to provide the Programme / Services to an applicant (if you enter the contract with us as their parent)</p>
<p>To enable an applicant (i.e. your child) to participate in a Programme / receive the Services</p>	<p>Your name, profession and organisation, residential address, email address, mobile number and WeChat ID</p>	<p>Legitimate interest – to enable us to provide the Programme and Services to the applicant (i.e. your child)</p> <p>Performance of our contract with you (if you enter into a contract with us on behalf of an applicant)</p>
<p>To enable us to contact you in a case of emergency</p>	<p>Your name, relationship with the participant of the Programme, contact address, email address, mobile number and WeChat ID</p>	<p>Legitimate interest – to enable us to contact you in the case of an emergency</p>

<p>To enable us to work with the universities, organisations, institutions or local authorities of cities you represent in providing the Services or Programmes (for example, if you are a tutor accompanying participants to the UK to attend a Programme)</p>	<p>Your name, email address and organisation details</p>	<p>Legitimate interest – to enable us to partner with them</p>
<p>To enable us to process a request from a third party (for example, an applicant's parents) for you to participate in a Programme or receive a Service from us</p>	<p>Your name (including English name), photo, gender, nationality, date of birth, residential address, postal address at the university, mobile number, WeChat ID, QQ, email address, education history (for example, name of university, date of attendance and degree), level of English proficiency, your extra-curricular interests, health conditions (for example, whether any special assistance is required during a Programme or provision of the Services), dietary requirements, passport number, international travel experience and expectations for the Programme / Services</p>	<p>Performance of our contract with you (if you enter into a contract with us)</p> <p>Legitimate interest – to enable us to provide the Programme / Services to an applicant (if you enter the contract with us as their parent)</p>
<p>To process payments for the provision of the Services or Programmes</p>	<p>Your name and bank, credit or debit card details</p>	<p>Performance of our contract with you (if the participant pays for the Programme or Services) or legitimate interest – to allow us to provide the Programmes or Services to the person on whose behalf you are making the payment</p>
<p>To provide you with an offer letter to enable you to apply for a VISA to attend a Programme or receive a</p>	<p>Your name and information about the Programme you will be attending / Services we will be providing to you</p>	<p>Performance of our contract with you</p>

Service in the United Kingdom		
To enable us to provide you with refreshments during the Programme or provision of the Services	Your name and dietary requirements (for example, requests for gluten free refreshments or information about food allergies)	Your explicit consent
To enable us to provide necessary medical information about you to a physician in case of a medical emergency	Your name and information about your health (for example, any illnesses you have mentioned in your application form)	Your explicit consent (if you are conscious) or to protect your vital interests (if you are unconscious and cannot provide consent)
To deal with any enquiries, correspondence, concerns or complaints you have raised	Your name, information about the issue raised and email address	Legitimate Interest – to allow us to improve the Services or Programmes
To carry out surveys and market research	Your name, information what university you attend and your opinion about the Services and Programmes	Legitimate interest – to allow us to better understand our clients and their preferences
To ensure that the Website is presented in the most effective manner for you and for your device	Technical information as mentioned above in the section entitled “data we collect you about you”	Legitimate interest – to allow us to present the Website better
For our internal operations, including data analysis, testing, research, statistical purposes and troubleshooting	Technical information as mentioned above in the section entitled “data we collect you about you”	Legitimate interest – to better understand our users of the Website and continuously improve the Website

As part of our efforts to keep the Website safe and secure	Technical information as mentioned above in the section entitled “data we collect you about you”	Legitimate Interest – to improve and ensure the safety of the Website
To send you newsletters about us and what we are doing, but also to provide you with information, products or services that you request from us or which we feel may interest you	Your name and email address	Consent given by you
To notify you about changes to any element of the terms and conditions in respect of the Services and Programmes, which may apply to you, the Website, Services or Programmes	Your name and email address	Performance of our contract with you
To process your application for a job with us	Your name, covering letter, CV, interview notes and contact details	Legitimate interest – to enable us to evaluate and recruit potential employees
To verify information provided during the recruitment process	Your name and employment history (for example, start and end date of your employment at the referee and information about your role)	Legitimate interest – to enable us to evaluate and recruit potential employees
To contact you and request details from you relating to a candidate who has nominated you as their referee	Your name, organisation and contact details	Legitimate interest – to enable us to assess a candidates suitability for employment
To carry out equal opportunities monitoring	Your race or ethnicity, religious beliefs, sexual orientation and political opinions	Public interest

<p>To allow you or the organisation that you represent to provide products or services to us</p>	<p>Your name, contact details (for example, email address, phone number or address) and information about the organisation that you represent (if applicable)</p>	<p>Performance of our contract with you (if you are providing the products or services as an individual) or legitimate interest – to enable us and the organisation you represent to perform our contract</p>
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Where we need to collect personal data by law or as part of a contract we have with you and you fail to provide that data when requested, we may not be able to provide you with the Services or a Programme or offer you a job.

Where we have a legal basis to use your personal data without consent (as we have described above), this policy fulfils our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you, by giving you appropriate notice and explanation of the way in which your personal data will be used.

Where consent is required for our use of your personal data as described above, we will request your consent. Typically, we would collect your consent by you performing an action such as ticking the appropriate consent box or otherwise communicating your consent to us (for example, by email or by you providing us with non mandatory information), you consent to our use of that personal data as set out in this policy. For example, we will only process your personal data for marketing purposes if we have your consent to do so.

You can always change your mind about our processing of your personal data. If you change your mind you can contact us by email at [info@summiteducationenterprise.com](mailto:info@summiteducationenterprise.com), or in respect of marketing messages you can unsubscribe by using the unsubscribe link at the bottom of our marketing messages.

## **DISCLOSURE OF YOUR PERSONAL DATA**

We may share your personal data with selected third parties in accordance with this policy, including:

- any member of our group of companies, including our subsidiaries and ultimate holding company;
- third parties who we partner up with to provide the Services or the Programmes;
- our service providers (for example, IT services), business partners, suppliers and sub-contractors;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website;

- government or other law enforcement agencies, in connection with the investigation of unlawful activities or for other legal reasons (this may include your location information);
- in the event that we sell any business or assets or receive investment into our business, in which case we may disclose your personal data to the prospective buyer or investor;
- a physician in the case of an emergency and your medical details have to be shared;
- if SEE or substantially all of its assets are acquired by a third party, in which case personal data held by us, including your personal data, will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the Terms and Conditions for the Services, Programmes or the Website or any other contract between you and us; or to protect the rights, property or safety of SEE, and others.

## WHERE WE STORE YOUR PERSONAL DATA

Your personal data will be transferred to, processed and stored at destinations outside the European Economic Area (“**EEA**”), for example, to universities we partner with in China.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. To find out which countries are covered by this, please see [here](#).
- Where there is no adequacy decision by the European Commission in respect of these countries (to the extent that they are outside the EEA), which means they are not deemed to provide an adequate level of protection to your personal data, we will still ensure that your personal data receives an adequate level of protection. We have therefore put in place the following measures to ensure that your personal data is treated by those third parties in a way that is consistent with EU and UK laws on data protection:
  - EU-US Privacy Shield; and/or
  - EU standard contractual clauses.

If you would like to find out more about these safeguards in respect of processing of your personal data, please contact us at [info@summiteducationenterprise.com](mailto:info@summiteducationenterprise.com).

## SECURITY

All information you provide to us is stored on secure servers. We will use appropriate technical and organisational measures to safeguard your personal data.

We maintain (and ensure that anyone we share your personal data with maintains) appropriate technical and organisational measures to ensure that an appropriate level of security in respect of all personal data we process. Unfortunately the transmission of information via the Internet



is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via the Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access or inadvertent disclosure.

## RETAINING PERSONAL DATA

We will retain the personal data we receive or collect about you for the period reasonably required for us to use it in accordance with this privacy policy or in accordance with our legal rights and obligations. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Unless we inform you otherwise (or you request that we erase your personal data), we will retain your personal data on record for as long as you continue to use the Services / Programmes.

Even if you request that we erase your data, we may still need to keep it (please see below) or may keep it in a form that does not identify you. If we are processing your personal data as part of our contract with you and you have not agreed that we may use your data for marketing purposes, we will retain your personal data on record for no more than the duration of the Programmes / Services with you and 6 years thereafter.

## YOUR RIGHTS

You have the following rights with regard to your personal data:

- **Access.** You have the right to access data we hold about you. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Rectification or erasure.** You have the right to request that we rectify or delete any personal data that we hold about you (unless we have the legal right to retain it). If you request that we erase any personal data that we require in order to provide the Services / Programmes to you, you may no longer be able to use it. This right does not extend to non-personal data. It is likely to be necessary for us to retain your personal data to enable us to carry out our contract with you and your rights under applicable law to request erasure may be limited accordingly.
- **Data portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller if the legal basis for processing such personal data is consent or performance of a contract.
- **Restriction.** You also have the right to restrict us from processing your personal data if the data is inaccurate, the processing is unlawful or we no longer need to your personal data for the purposes for which we hold it.
- **Object / Change of preferences.** You have a right to request that we stop processing your personal data where we are relying on a legitimate interest (or those of a third

party). You also have the right to object where we are processing your personal data for direct marketing purposes. For example, if you have given your consent to receive updates from us about new products or services, but have changed your mind, you have the ability to opt out from receiving such communications going forward by contacting us using the details provided below or clicking the relevant link in any communications you receive. Please note, if you submit a request for us to stop processing your personal data in a certain way and this type of processing is required in order to facilitate your participation in the Services or the Programmes, you will no longer be able to participate in the Services or Programmes following your request for us to stop the relevant processing.

- **Complaints.** If for any reason you are not happy with the way that we have handled your personal data, please contact us. If you are still not happy, you have the right to make a complaint to the Information Commissioner's Office.
- **Automated decision making.** We do not currently carry out decisions based solely on automated processing, including profiling. If we change our practices to do this in a way which has legal or similarly significant effects on you, you may have the right to object. If this becomes relevant in the future, we will update this policy to provide further information.

Please note that the rights mentioned above do not extend to **non-personal data**.

If you would like to exercise any of the rights mentioned above, please contact us at Summit Education Enterprise Limited at Clarendon House, 52 Cornmarket St, Oxford OX1 3HJ, United Kingdom or by email at [info@summiteducationenterprise.com](mailto:info@summiteducationenterprise.com).

## COOKIES

We use cookies, which are small files of letters and numbers that we store on your browser or the hard drive of your computer or mobile device if you agree. Cookies contain information that is transferred to your computer's or mobile device's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of the Website.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way the Website.
- **Functionality cookies.** These are used to recognise you when you return to the Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to the Website, the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website.

For more detailed information about cookies and how they can be managed and deleted, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **CHANGES TO THE PRIVACY AND COOKIES POLICY**

Any changes we make to our privacy and cookies policy in the future will be posted on our website [here](#) and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy and cookies policies. Continued use of the Website or Services (as appropriate) will signify that you agree to such changes.

## **HOW TO CONTACT US**

Questions, comments and requests regarding the privacy policy and the cookie policy are welcomed and should be addressed to the Data Protection Compliance Officer, Summit Education Enterprise Limited at Clarendon House, 52 Cornmarket St, Oxford OX1 3HJ, United Kingdom or by email at [info@summiteducationenterprise.com](mailto:info@summiteducationenterprise.com)

Please also contact us if you would like to know more about our data processing activities, to update or amend any of your personal data which you have provided to us or if you believe our records relating to your personal data are incorrect.

This privacy and cookies policy was last updated on [01/06/18].