

Schools Own Croatia understands concerns about how data may be stored, sent and used by companies particularly data relating to students/minors for whom you are responsible. Your and their privacy is important to us. We are committed to safeguarding any personal data you give us or we collect.

This Policy procedure describes how we collect, use, process, store and disclose information, including personal information, while providing our services. We do our best to keep the information we collect about you and those you are responsible for to the minimum necessary. Unless we have a specific lawful reason to use this information, we will ask for your consent to collect it. We also let you know what rights you have over your information.

### The information we collect

- Personal Information you share with us while enquiring about a programme offer or making a booking with us:
  - School contract holder Information. We require certain personal information such as your first and last name, job position, telephone number and email address when we first register your requirements.
  - Information about other programme participants including all students/minors for whom you are acting during the booking process. This may also include other school departmental staff who are involved in the contract process i.e. the school Finance Department. When doing so, as in all other aspects of our contract process, **you undertake to act with their consent and authority or the authority of their parents or guardians and to make them aware of this privacy policy.**
  - Finance Information including school bank account, invoicing and payment details.
  - Pertinent Medical Information i.e. allergies, medical conditions or disabilities, specialised assistance required and recommended or prescribed treatment / therapies.
  - Dietary requirements or restrictions.
  - Relevant qualifications and experience.
  - Travel Information and documents including passport details and flight details.
  - Record of conversations. Details of interactions between us and you, the results of any surveys or evaluations, testimonials, complaints or incidents.

- Contact information of School subject leaders gained from publicly available sources
- Personal Information you share with us while enquiring about a job offer including previous experience, relevant qualifications and references.

**WE DO NOT COLLECT INFORMATION DIRECTLY FROM MINORS.** Any necessary personal information required by us for the safe and lawful performance of the contract (including names, gender, dates of birth, nationality, next of kin details, medical conditions, diets etc) of students below the age of 18 will be collected by the school programme leader who, acting 'in loco parentis', is required to release it to us when required by us. It may be necessary for us to share this information with our locally employed staff or other local service providers i.e. accommodation

## How do we collect your information

Depending on your interactions with us we may collect information in the following ways:

- Direct Interactions: You may give us your identity, contact details and other data by filling in forms or by corresponding with us by phone and email or otherwise. This includes personal data you provide when you:
  - Fill in part of the booking information on our site but do not complete the booking.
  - Agree to receive email updates or our service newsletters.
  - Create an account on our website and enter information onto online forms.
  - Provide us with information about an accident, illness or incident that occurred or some other feedback.
  - Attend any of our events.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies (see our cookies policy below), server logs and other similar technologies.
- Third parties or publicly available sources such as School websites or Directories. We may receive personal data about you from various third parties as set out below:

- Airlines, hotel providers or other parties we work with if you make a complaint to them or they make a complaint to us;
- Analytics providers
- Public information

## How we use the information we collect

WHAT DO WE USE YOUR INFORMATION FOR? Under data protection laws we are allowed to use personal information only if we have a proper reason to do so such as:

- To fulfil a contract we have with you or;
- When it is our legal duty or;
- When it is in our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests, or
- When you consent to it. Generally we do not rely upon consent as a legal basis for processing your personal data other than in relation to sending our direct marketing communications to you via e-mail. You have the right to withdraw consent to marketing at any time by contacting us. We have set out below a description of all the ways we plan to use your personal data:
  - To prepare a contract offer for you and provide other information assistance prior to a booking.
  - To manage your booking with us. We will use your information to provide you with any travel services that you request or purchase. This entails booking your flights, accommodations, transportation, organising activities or other components of your itinerary and providing you with your tickets or any special assistance you require. Also alerting you to changes in itineraries or responding to any complaints you have.
  - To ensure the safety of programme participants by enabling us to manage their well-being and to avoid safeguarding risks particularly of Minors.
  - To enable us and you to complete a service evaluation report in order to establish performance outcomes and improve service quality.
  - To personalise your customer experience and improve our service presenting you with relevant products and services.
  - To ensure security of our services, staff and suppliers and protect our business interests. To deter and investigate fraud and unauthorised or illegal activities.
  - To process any job applications in order to recruit suitable new employees or contractors.
  - To optimise our website and other internet based promotional offers and newsletters . If you use our sites we will use your information and data analytics to ensure that the content is presented in an effective manner for

- you and your device.
- To comply with our legal obligations for instance in relation to any court orders or insurance claims.
- To send you marketing communications. We will use your information to contact you in order to keep you up to date with the latest news, offers, events, promotions that we consider may be of interest or relevant to you. We will usually only do this on the basis of our legitimate interest to provide you with a customer service and curriculum subject support. Please see the Marketing section below for more information.

## Our Marketing Practices

One of the reasons we sometimes collect information is so that we can assess what we think you and your school may want or need in support of Learning Outside the Classroom aspects of the national curriculum for example field study trips. With this information we decide which products, services and offers may be relevant for you and what marketing you may be interested in. We only contact you with offers, facilities and promotions that we think might be of professional interest/educational relevance to you and your students (legitimate interest, both ours and yours)

- **What if I don't want to receive marketing?** We never want to send our marketing to someone who isn't interested in receiving this content. If you do not want to hear from us, you can unsubscribe from marketing by clicking on the 'unsubscribe' link included in all of our e-mails or by contacting us directly.
- **Third parties and marketing.** We do not pass your information to other parties for marketing purposes.

## Sharing Your Personal Data

In order to provide you with the contracted services on the lawful grounds described above, we may share your personal information with third parties such as:

- Third party suppliers we work with to deliver your booking and other services to you such as programme guides, airlines, tour operators, transport companies, accommodation providers, airport authorities and insurance companies.
- Medical and other emergency services in the event of illness, injury or other emergency in order to look after your health, safety and well-being during your trip.
- Other government authorities i.e. immigration / border control and national

parks for the purpose of acquiring entry permits and licences. This would usually be the basic information contained in your passport

- Courts or advisors. We may have to share your information with other third parties (such as lawyers, accountants or other advisors, regulatory authorities, courts and government agencies) to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law

## Your Personal Data Rights

We want you to feel reassured that you have control of your personal information. With this in mind, we have explained below the rights you have in relation to the personal information we hold about you:

- The right to be advised of how we will use your personal information. This is set out in this privacy policy.
- The right to ask us to correct any information you believe is incorrect
- The right to ask us to not to use your information for marketing purposes.
- The right to receive a copy of the personal data we hold about you or to request that we transfer this to another service provider.
- In certain circumstances, the right to ask us to stop using information about you.
- The right to ask us to limit or cease processing or erase information we hold about you in certain circumstances.
- The right to withdraw consent that you have provided to us to use your personal information.

**How can you exercise your rights?** You can exercise these rights over your data by contacting us or by checking the applicable boxes on forms where we collect your information or to tell us that you don't want to participate in marketing. You can also unsubscribe from any marketing circulation lists you are on by scrolling to the bottom of the e-mail and clicking the 'unsubscribe' link. We will comply with your requests, unless we have a lawful reason not to do so. We may need you to provide additional details to confirm your identity in order to process your request.

## Data Security

We have put in place appropriate security measures to prevent unauthorised access of your personal data, it being accidentally lost, misused, altered or inappropriately

disclosed. 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 on our instructions and they are subject to a duty of confidentiality. 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

**For how long do we retain your data?** We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purpose of satisfying any legal accounting or reporting requirements. We operate a data retention policy and look to find ways to reduce the amount of information we hold and the length of time we hold it for. By law we have to keep basic information about booking and our customers for six years for legal claims and tax purposes. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## How to Contact Us

If you have any questions or concerns about this privacy notice, including any requests to exercise your legal rights, please contact [jeremy@schoolsown.com](mailto:jeremy@schoolsown.com) in the first instance. If we are unable to resolve your concern, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) or the relevant data protection authority where you live.

## Other Privacy Information

**Change of Purpose.** We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by

**Changes to this privacy policy and your duty to inform us of changes.** We

keep our privacy policy under regular review. This version was last updated on 1<sup>st</sup> June 2018. 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 relationship with us.

## Cookies Policy

Schools Own Croatia uses cookies on its website **as almost all websites do, to help us provide you with the best experience possible**. By using our website, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies and your choices regarding cookies.

We do not use cookies to:

- collect any information that could identify you personally.
- collect any sensitive information.
- pass data to advertising networks.

## What are Cookies

Cookies are small pieces of text sent to your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies.

## Allowing us to use Cookies

If the settings on the software that you use to view our website (your browser) are adjusted to accept cookies we will interpret this, and your continued use of our website, to mean that you accept our use of cookies.

We use cookies to compile anonymous visitor statistics such as how many people have visited our website, what type of technology they are using, how long they spend on the site, what page they look at etc. This helps us to continuously improve our website. These so called analytic programs also tell us how, on an anonymous basis, people reached this site (e.g. from a search engine).

## Turning Cookies off

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. To disable Google Analytics, visit this tool: <https://tools.google.com/dlpage/gaoptout>

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

## Our Cookies

Below is a table of information which lists all cookies used on our website.

		Cookie Description
Google Analytics	_utma	A Google Analytics cookie, which keeps track of the number of times, a visitor has been to the site, when their first visit was, and when their last visit occurred.
Google Analytics	_utmb	A Google Analytics cookie, which creates a timestamp of the exact moment when a visitor enters a site.
Google Analytics	_utmc	A Google Analytics cookie, which creates a timestamp of the exact moment when a visitor leaves the site.
Google Analytics	_utmz	A Google Analytics cookie which tracks where the visitor came from, what search engine was used, what link was clicked on, what keywords used, and where in the world the site was accessed from.
Google Maps	PREF, NID	This cookie is set by Google Maps when you load a map of our location