

PRIVACY POLICY

LG&DE Limited, trading as Direct English ("We" and "Us") are committed to protecting and respecting your privacy.

This policy (together with our terms of use [INSERT LINK TO WEBSITE TERMS OF USE], the terms of use of our platform provider, Learning Cloud [INSERT LINK TO LC TERMS OF USE], and any other documents referred to on it) sets out the basis on which any personal data We collect from you, or that you provide to Us, will be processed by Us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it. By visiting www.directenglish.com (the "Website") you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the "Act"), the data controller is LG&DE Limited (a company registered in England and Wales with company registration number 05694539) of Liongate Enterprise Park, 80 Morden Road, Mitcham CR4 4PH.

Information we may collect from you

We may collect and process the following data about you:

- **Information you give us.** You may give Us information about you by filling in forms, tests and/or assessments on the Website or by corresponding with Us by phone, e-mail or otherwise. This includes information you provide when you register to use the Website, subscribe to and use our services (including any test answers you submit), including any information you submit via our Social App or other interactive services accessed on or via the Website and when you report a problem with the Website. The information you give Us will include your full name, e-mail address and phone and mobile or cell phone number and may include your address. We will not take any payment details from you.
- **Information we collect about you.** With regard to each of your visits to the Website We may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information (which may also include your name, e-mail address, phone number and address), browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); your test and assessment results obtained from your use of our services and the services provided by our third party providers of services; pages and information you viewed or searched for; 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 and any phone number used to call us.

- **Information we receive from other sources.** We may receive information about you if you use any of the other websites We operate or the other services We provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Cookies

The Website uses cookies to distinguish you from other users of the Website. This helps Us to provide you with a good experience when you browse the Website and also allows Us to improve the Website. For detailed information on the cookies We use and the purposes for which We use them see our Cookie policy [hyperlink].

Uses made of the information

We use information held about you in the following ways:

- **Information you give to Us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and Us and to provide you with the information, products and services that you request from Us;
 - to notify you about changes to our services;
 - to notify your particular school or educational body of your progress, take up and/or usage of our services and systems;
 - to notify any of our centres, which are operated by selected third party operators who are licensed by us, of any interest in their services which you have indicated you may wish to pursue as a result of information submitted by you on the Website and/or as a result of any test or assessment taken by you on or via the Website, the results of which we will forward to such centres/operators. Where you complete any test or assessment via the Website, we will share the results of the same with the relevant centre/operator in your local area who would be able to provide you with follow-up services and education so that they may contact you in relation to the same. We will transfer any data you submit in relation to any test taken by you on or via the Website to a third party site operated by one of our contracting parties for storage and processing. If at any time you do not wish us to do any of the above, you should contact us by sending us an e-mail to that effect to admin@directenglish.com;
 - to ensure that content from the Website is presented in the most effective manner for you and for your computer.

We will also allow authorised users to access this information via our multi-tenanted user authentication system. Such authorised users will consist of our authorised representatives, our licensees who operate education centres, your teachers and supervisors and your school or relevant educational body, but shall not include your peers or anyone else without responsibility for your education or its supervision (the “**Authorised Users**”).

- **Information we collect about you.** We will use this information:
 - to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve the Website to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our services, including but not limited to the Social App, when you choose to do so;
 - as part of our efforts to keep the Website safe and secure;
 - to measure or understand the effectiveness of advertising We serve to you and others, and to deliver relevant advertising to you;
 - to allow access to the same for Authorised Users (as defined above [insert click-through link to the paragraph above where the Authorised Users definition is located]]) to enable them to assist and supervise you .
- **Information we receive from other sources.** We may combine this information with information you give to us and information We collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information We receive).

Disclosure of your information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will share your information with selected third parties including:

- Business partners, master licensees and sub-licensees (being third parties we expressly licence (and who they sub-licence) to use our products and know-how to provide educational services to you relating to the teaching of English), suppliers and sub-contractors for the performance of any contract We enter into with them or you. This will include but is not limited to third party operators of our affiliated learning and educational centres and the school and/or educational body of which you are a member and/or to which you are subject.
- Analytics and search engine providers that assist Us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets.

- If LG&DE Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients or students will be one of the transferred assets.
- 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 our terms of use [INSERT LINK TO WEBSITE'S TERMS OF USE] and other agreements; or to protect the rights, property, or safety of LG&DE Limited, our clients or students, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Consent to Contact

By using the Website you consent to Us and the above-referenced third parties contacting you for the above purposes, by email, telephone or in writing and you confirm that you do not and will not consider any of the above as being a breach of any of your rights under the Privacy and Electronic Communications (EC Directive) Regulations 2003 or any equivalent legislation or regulation. To the extent that you wish such contact to cease, you may request this at any time by contacting us at admin@directenglish.com.

Where we store your personal data

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your testing, education and assessment and the provision of support and ancillary services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to Us is stored on our secure servers. Where We have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 to our site; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

Links to other websites

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note

that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act by notifying us at admin@directenglish.com. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information We hold about you.

Changes to our privacy policy

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to admin@directenglish.com.