

## Privacy Notice For Parents, Members and Website Users

This Privacy Notice (“**Privacy Notice**”) sets out how Arka Learning Limited and its affiliates (“**Arka Learning**,” “**we**,” or “**us**”) collect, use, share, store, transfer, protect, and remove your personal information. We respect your right to data privacy and maintain a strict policy of confidentiality for members and parents. We are committed to protecting and safeguarding your personal information. As part of this commitment, this Privacy Notice aligns with the Data Protection Act 2018, the General Data Protection Regulation (“**GDPR**”), and other applicable data privacy laws (collectively, “**Data Protection Laws**”). This Privacy Notice relates to all personal information you provide to Arka Learning and all personal information that Arka Learning holds in relation to your use of [our website](#) (the “**Website**”) and our services. It supplements and is in addition to our Terms and Conditions and should be read in conjunction with them.

If you have any questions about this Privacy Notice, you can contact us at: [hello@arkalearning.com](mailto:hello@arkalearning.com).

This Privacy Notice should be read in conjunction with our Safe Storage and Management of Confidential Documents Records Policy.

This Privacy Notice will help you understand the following:

1. How we collect and use your personal information.
2. How we disclose your personal information.
3. How we protect your personal information.
4. How we use Cookies.
5. Your rights in relation to your personal information.
6. Third-Party Sites.
7. How we process the personal information of minors.
8. Changes to this Privacy Notice.
9. How you can contact us.

**Please read this Privacy Notice carefully and ensure you understand it before using our Website and services.**

### **1. How we collect and use your personal information**

“**Personal information**” refers to any information that is recorded, electronically or otherwise, that can be used alone or in combination with other information to identify a natural person or reflect the activity of a natural person.

In line with applicable Data Protection Laws, we only collect and use personal information where we have a valid reason to do so, including but not limited to where you have provided your consent for us to do so, or where we are required to do so either to fulfil our contractual obligations to you, or comply with our legal obligations.

We collect the following personal information from you for the following purposes:

- **Registration and Student Details:** This includes:
  - Emergency contact details for a parent or other appropriate adult
  - Name, home address and date of birth of the child
  - Name, home address, email address and mobile phone number of the parent
  - Bank or card details for payment of fees
  - Medical conditions and Additional Educational Needs
  - Record of medication administered whilst at the centre
  - Record of attendance

We collect such information to maintain records within our systems, enable you to create, log into, and access your account, to contact you and to deliver educational services to your child.

- **Usage Data:** we may also collect data regarding your use of the Website, including geographical location, browser type and version, operating system, referral source, length of visit, page views and Website navigation paths, as well as information about the timing, frequency and pattern of your use. This data is obtained through Google Analytics and will be aggregated and anonymised in such a way that it contains no information pertaining to any identifiable individual at all – as such it is not actually personal information but we address it in this Privacy Notice for completeness. We process usage data for the sole purpose of improving our Website and services.
- **CCTV:** For the safety and security of students, customers and staff we operate CCTV within our learning centres. Recordings are securely stored on site for a limited time only before being deleted.

## 2. How we disclose your personal information

We will not disclose personal information that you provide us with any company, organisation or individual unless with your explicit consent.

We may on occasion share your personal information as follows:

- From time to time, we may also share your **Registration and Student Details**, with your consent, with third parties, such as schools.

- We may share your **Payment Details** with our trusted payment partners for secure processing of payment.
- We may share information with professional advisers (e.g. lawyers, insurers and accountants) with strict requirements that they keep information confidential.
- Your data may be shared with service providers (e.g. software providers and our web hosting platform) with strict requirements to securely store such data and keep it confidential.
- We use third-party newsletter email management. We may share your contact details with our third-party newsletter email management service providers for the purpose of providing you with newsletters, where you have agreed to receive them.
  - Our newsletters employ tracking so that we can monitor at an individual level whether a recipient has opened the email and what content they have clicked on. We only send our newsletter to recipients where there is a legitimate interest to do so and/or where you have agreed to receive our newsletter. This includes sending emails giving details of relevant events and courses and updates to individuals who have subscribed via our website or who are registered clients.
  - Recipients can easily unsubscribe from the newsletter if they wish by clicking on the unsubscribe link at the bottom of each email.
- Other than sharing information as outlined in this Privacy Notice, we will keep your personal information confidential within our group of companies and will not disclose it to any third parties, unless we are required to do so by law.

### **3. How we protect your personal information**

We will take appropriate administrative, physical, and technical measures to safeguard your personal information from unauthorised access, collection, use, public disclosure, copying, modification, disposal or similar risks, and the loss of any storage medium or device on which personal information is stored. Your personal information will only be kept for a commercially reasonable period of time for the purposes stated above, and/or for as long as we have your permission to keep it. In addition, we limit access to your personal information to those staff who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal information, and are constantly reviewing and enhancing our security measures.

In the event your personal information is subject to any unauthorised disclosure or access or any data breach incidents ("**Data Breach Incident**"), we will, in a timely manner and in

accordance with laws and regulations, inform you of the basic conditions and possible impacts of the Data Breach Incident, response measures that are already taken or to be taken by us, suggestions for you regarding self-prevention and risk mitigation, our recommended remedial measures for you, and other relevant information. We will inform you of such information by email or telephone. Where it is difficult or not practical for us to notify each data subject individually, we will properly and effectively issue a public notice. We will also report the handling of such Data Breach Incident to the relevant authorities in accordance with regulatory requirements.

#### **4. How we use Cookies**

A cookie is a piece of information that web servers send to your browser file when you access a website, then when you come back to a Website again, that website will detect whether you have cookies on your browser file. We occasionally issue session cookies when strictly necessary for the operation of the website (e.g., logging into our member account area). These cookies do not hold any personal information.

We use cookies to identify which pages on our Website are being used. This helps us analyse data about web page traffic and improve our Website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better service, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies upon each visit to our Website. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

You can find out more about [what cookies are, how to control them and delete them here](#). Google Analytics and third-party services such as Google Maps, Twitter and Facebook may issue cookies. [Further information on Google Analytics and Privacy can be found here](#).

#### **5. Your rights in relation to your personal information**

At any point while we are in possession of or processing your personal information, you, as the data subject, have the following rights:

- **Right of access** - You have the right to request a copy of the personal information that we hold about you.

- **Right of rectification** - You have a right to correct personal information that we hold about you that is inaccurate or incomplete.
- **Right to request deletion** - You have the right to request for your personal information to be deleted in the following circumstances:
  - If the purpose for such processing has already been achieved, is no longer achievable, or if the personal information is no longer necessary for such purpose.
  - If you no longer use our products or services or if we no longer provide you with our products or services.
  - If we collected and used your personal information without your consent, or if you choose to withdraw your consent.
  - If our processing of your personal information violates any laws or regulations, or breaches our agreement with you.
  - Any other circumstances prescribed by applicable laws.
- **Right to object** - You have the right to object to certain types of processing such as direct marketing.
- **Right to data portability** – You have the right to move, copy or transfer your personal information for your own purposes across different services (e.g., from us to a different service provider).
- **Right to change the scope of consent or withdraw consent** – You have the right to change the scope of your consent or withdraw your consent at any time.

Please contact [hello@arklearning.com](mailto:hello@arklearning.com) if you would like to exercise any of these rights. For security, you may be required to submit written requests or prove your identity by other means. We may ask you to verify your identity before handling your request.

We will generally reply to you within thirty (30) days upon verification of your identity, and will inform you if we require additional time to process your request.

Please note that we will reject your request under the following circumstances:

- If we are required by laws or regulations;
- If we are required to safeguard national security;
- If we are required to safeguard public security, public health or major public interests;
- If we are required as a result of criminal investigations, prosecutions, trials and enforcement of court decisions, etc
- Where you are abusing your rights;

- In order to safeguard the life, property, and other important legal rights and interests of you or other individuals;
- Where doing so will cause serious harm to your legitimate rights and interests, or those of other individuals or organizations; or
- If we are required to safeguard trade secrets.

## **6. Third-party sites**

The Website may from time to time, contain links to other websites, such as our affiliates, advertisers, or other third parties. Certain functions and features on our website (such as the payment function) and services may be provided by third parties (such as payment service providers). When you access or use such third-party services, or when you click on the link to third-party websites, your personal information may be collected directly by such third-party service providers.

As these third-party websites and third-party services are not owned or operated by us, we do not assume any responsibility or liability for such third-party service providers, or the collection of your personal information by such third-party service providers. Your access to such third-party websites and third-party services, and provision of personal information to these third-party service providers are entirely at your own risk. Please check the privacy policies that apply to such third-party websites and third-party services carefully before you provide any personal information to such third-party service providers.

By accessing or using third-party websites and/or third-party services, or providing your personal information to third-party service providers, you acknowledge and agree that:

- You have read and understood such third-party service providers' privacy policies, and consent to the collection, use, disclosure and/or processing of your personal information by such third-party service providers pursuant to their privacy policies;
- We do not control such third-party service providers, and the manner in which and purposes for which your personal information may be collected, used, disclosed and/or processed is determined solely by such third-party service providers as data controllers (as defined under applicable data protection laws); and
- To the maximum extent permissible by law, we shall not be liable for any liabilities, losses or damages that may be incurred by you as a result of your use of any third-party websites and/or third-party services, or the collection, use, disclosure and/or processing of your personal information by any third-party service providers.

## **7. How we process the personal information of minors**

Some of the personal data that we collect will be “sensitive personal data”. This category of personal data will be subject to additional protections.

We will only collect the personal information of children with their parent’s / guardian’s consent. If you are the parent / guardian of a child, by providing the personal information of such child to us, you hereby consent to our processing of such personal information.

If we discover a child’s personal information has been collected without his/her parent’s / guardian’s consent, we will delete the relevant personal information as soon as possible.

## **8. Changes to this Privacy Notice**

The terms of this Privacy Notice may be revised from time to time and we will use commercially reasonable methods to notify you of such revisions, such as by posting a revised version of this Privacy Notice on our Website or by notifying you of the revision via email if you have provided your email address to us. This Privacy Notice was last updated on the date set out above.

## **9. Contact Us**

If you have any questions in relation to our use of your personal information or this Privacy Notice, please contact us at: [hello@arklearning.com](mailto:hello@arklearning.com).

In order to verify your identity, we may require you to provide proof of your identity, as well as your contact details. We will generally reply to you within thirty (30) days upon verification of your identity, and will inform you if we require additional time to process your request.