

Record of Processing Activities according to Art. 30 GDPR

for Language Tree Ltd.

| Process | Purpose | Categories of Data | Categories of Data subject | Legal basis | Recipients of data/Subprocessors | Transfer to third country? | Retention period |
|---------------------------|---|--|----------------------------------|--------------------------------------|---|----------------------------|---|
| Customer database | Master spreadsheet for holding key customer & enquirer information | Name & email with course interests provided by email or through completing our contact forms on our website | Consumers | Art. 6, 1 a) & b) GDPR | Information received through Microsoft Outlook or Fidelo (CRM forms on website). Stored on Airtable, iCloud, Microsoft Outlook & Fidelo | No | 7 years or earlier if customer requests removal |
| Billing and Accounting | For customers to pay for courses and receive details of their course* | Name, bank details requested only in the event of a refund** | Consumers | Art. 6, 1 a) & b) GDPR | iCloud, Stripe, PayPal, iZettle, Santander, Wise | No | For five years following the end of the course **bank details deleted from computer as soon as refund is processed |
| Course booking | To hold important personal details of students studying with us in case of emergency situations | Name, address, previous studies and professional information, emergency contacts, age, potential health issues pertinent to studying with us | Consumers | Art. 6, 1 a), b), c) & d) GDPR | Microsoft Outlook, iCloud, Airtable, Fidelo | No | Held in paper format for two years following the end of the course |

| Marketing | To keep in contact | Name, email, course | Consumers | Art. 6, | Facebook & | No | Until customer requests |
|-------------------------------------|--|--|----------------------------|--|--|----|--|
| measures | with potential and former customers regarding our courses | interests | | 1 a) & b) GDPR | Instagram, Hubspot, Microsoft Outlook, iCloud, Fidelo | | removal – details removed from Airtable and computer on request |
| Staff & Agent information & payroll | To employ & pay staff in line with UK legal requirements | Name, address, professional history, qualifications, NI number, email, telephone, DBS checks, identity documents | Employees | Art. 6, 1 a), b), c), d) & e) GDPR | HMRC, DBS - eSafeguarding, Microsoft Outlook, iCloud, Freeagent | | Seven years following the end of employment |
| Website Analysis | To promote our courses and analyse popular trends on the website | IP addresses | Consumers, web visitors | Art. 6, 1 a) GDPR | Google Analytics | | We do not hold this data, nor have access to the IP addresses. We can only view the anonymised analytics data. |

^{*} We have three main payment options. In all situations we do not collect bank details, though they will be held by the sub-processer:

- 1. Bank transfer to Santander or Transferwise
- 2. Online payment on our website using Stripe or Paypal
- 3. Payment at the school by card (iZettle) or in cash

This can be found at: https://languagetreeschool.com/privacy-policy/