



## Privacy Policy for parents, students and website visitors

### Important information and who we are

This Privacy Policy gives you information about how Les Crocodiles collects and uses your personal data through your use of this website and through your registration of yourself or your child or children (“**Child**” or “**Children**”) as a student at the Les Crocodiles language school (the “**School**”). This Privacy Policy also applies to any visitors to the School, charitable donors and suppliers.

The objectives of the Les Crocodiles are *“To advance the education for the public benefit by teaching the French language and French culture, heritage and history to children in East and North London and to adults through the provision of after school, weekend and holiday classes and through organising events open to the general public as the trustees shall determine.”*

The UN Convention on the Rights of the Child defines a child as everyone under 18 years unless, *“under the law applicable to the child, majority is attained earlier”* (Office of the High Commissioner for Human Rights, 1989). Under UK data protection laws, including the UK General Data Protection Regulation (“**GDPR**”) and the Data Protection Act 2018, children under the age of 13 cannot give consent in relation to information society services without the consent of the holders of parental responsibility for the child.

When we refer to someone with parental responsibility for a child, we mean someone who has the legal rights and responsibilities for a child that are normally afforded to parents. This will not always be a child’s “natural parents” and parental responsibility can be held by more than one natural or legal person. In this Privacy Policy, references to a “**Parent**” or “**Parents**” mean person or persons with parental responsibility for a Child.

Parents should read this Privacy Policy together with the [Privacy Policy for Children](#).

### Controller

**Les Crocodiles** (charity incorporated organisation (CIO) entered in the Register of Charities at the Charity Commission under the charity number 1158669 with a registered office address of Flat 1203, Moro Apartments, 22 New Festival Avenue, London, E14 6FT) is the controller and responsible for your personal data (collectively referred to as “**Les Crocodiles**”, “**we**”, “**us**” or “**our**” in this Privacy Policy).

### Contact us

If you have any questions about this Privacy Policy, please contact us at [privacy@les-crocodiles.org](mailto:privacy@les-crocodiles.org).

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing this Privacy Policy. The DPO can be contacted by email at [dpo@les-crocodiles.org](mailto:dpo@les-crocodiles.org).

We keep our Privacy Policy under regular review. This version was last updated on 8 May 2024. Historic versions can be obtained by contacting us.



## 1. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you or the Children which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth, gender, and images, audio and video identifying you.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details and state benefits information.
- **Transaction Data** includes details about payments from you and other details of products and services you have purchased from us.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

## 2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services, including registering yourself or a Child for the School;
  - request our email updates to be sent to you; and
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as GoCardless based outside the UK.



### 3. How we use your personal data

#### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you. This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such contract.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.



**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We have identified the different categories of data subjects this Privacy Policy applies to as follows:

- **Children:** Current, past or prospective students at the School.
- **Parents:** Persons with parental responsibility for Children.
- **Website users:** Visitors to the Les Crocodiles website.
- **Visitors:** Visitors to the Les Crocodiles School.
- **Suppliers:** Suppliers of products or services to Les Crocodiles.
- **Donors:** Charitable donors to Les Crocodiles.

<b>Purpose/Use</b>	<b>Category of data subject</b>	<b>Type of data</b>	<b>Legal basis</b>
To register you as a student and manage School admissions	(a) Children (b) Parents	(a) Identity (b) Contact	Performance of a contract with you to admit you or your Child to the School
To administer the School curriculum and timetable	(a) Children (b) Parents	(a) Identity (b) Contact	Performance of a contract with you to provide you or your Child with French language lessons at the School
To support students' teaching and learning	(a) Children (b) Parents	(a) Identity (b) Contact	(a) Performance of a contract with you to provide you or your Child with French language lessons at the School  (b) Necessary for our legitimate interests (to improve our services)
To monitor and report on students' progress and attendance	(a) Children (b) Parents	(a) Identity (b) Contact	Performance of a contract with you to provide you or your Child with French language lessons at the School
To provide library services	(a) Children	(a) Identity	Performance of a contract with you to provide you or your Child



at the School	(b) Parents	(b) Contact	with French language lessons at the School
To provide appropriate pastoral care	(a) Children (b) Parents	(a) Identity (b) Contact	(a) Performance of a contract with you to provide you or your Child with French language lessons at the School (b) Necessary to comply with a legal obligation (compliance with safeguarding laws)
To take photographs and record videos of the lessons at the School, to post the photographs and videos to the ClassDojo class management app and to use the photographs and videos for promotional purposes on our website and social media	(a) Children (b) Parents	(a) Identity (b) Contact	(a) Where you and/or your Child (as appropriate) have provided your consent
To administer and implement rules and policies for the School	(a) Children (b) Parents	(a) Identity (b) Contact	(a) Performance of a contract with you to provide you or your Child with French language lessons at the School (b) Necessary for our legitimate interests (to improve our services) (c) Necessary to comply with a legal obligation (compliance with safeguarding laws)
To comply with safeguarding laws, including maintaining a register of incidents or reports relating to safeguarding	(a) Children (b) Parents	(a) Identity (b) Contact	Necessary to comply with a legal obligation (compliance with safeguarding laws)
To process tuition fees or donations including: (a) Manage payments,	(a) Children (b) Parents (c) Website	(a) Identity (b) Contact	(a) Performance of a contract with you to admit you to the School, accept your donation



<p>invoices, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>users</p> <p>(d) Suppliers</p> <p>(e) Donors</p>	<p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>or the products or services you supply to us</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To assess and improve the quality of our services</p>	<p>(a) Parents</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>(a) Performance of a contract with you to provide you or your Child with French language lessons at the School</p> <p>(b) Necessary for our legitimate interests (to improve our services)</p> <p>(c) Consent provided by you</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms</p> <p>(b) Dealing with your requests, complaints and queries</p> <p>(c) Contacting you in cases of emergency regarding your Child</p>	<p>(a) Children</p> <p>(b) Parents</p> <p>(c) Website users</p> <p>(d) Suppliers</p> <p>(e) Donors</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Website users</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)</p> <p>(b) Necessary to comply with a legal obligation</p>



## Cookies

For more information about the cookies we use and how to change your cookie preferences, please see our [Cookie Policy](#).

## 4. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table above.

- External third parties such as providers of cloud storage, hosting and email services (including Salesforce, Microsoft Office 365, Waterbear library software, QuickFile, ClassDojo and Typeform) and payment services providers (including GoCardless).
- French and Francophone public institutions and public bodies for fundraising purposes, including the AEFÉ (*l'Agence pour l'enseignement du Français à L'Étranger*) and the Parapluie FLAM (*Français Langue Maternelle*).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- Where required by law, to regulators and supervisory authorities upon request.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5. International transfers

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the appropriate safeguards are implemented, either by only transferring your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data, or using specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK.



## 6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, independent 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.

## 7. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see paragraph 8 below for further information.

## 8. Your legal rights

You have a number of rights under data protection laws in relation to your personal data. You have the right to:

- **Request access to your personal data** (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data** in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.





- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us at the details set out at the beginning of this Privacy Policy.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your or your Child's identity and your relationship with your Child as a Parent and ensure your right to access your or your Child's personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**



We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Children’s data subject rights**

Where the Child is over the age of 13, the Child can exercise their own data subject rights as set out in this Privacy Policy. Parents should be aware that in such situations they may not be consulted, depending on the interests of the Child, the Parents’ rights at law or under any contract and all other relevant circumstances.

In general, we will assume that Children’s consent is not required for the ordinary disclosure of their personal data to their Parents, e.g. for the purposes of keeping Parents informed about the Child’s activities, progress and behaviour, and in the interests of the Child’s welfare, unless, in our opinion, there is a good reason to do otherwise.

However, where a Child seeks to raise concerns confidentially with a member of our staff and expressly withholds their agreement to their personal data being disclosed to their Parents, we may be under an obligation to maintain confidentiality, unless, in our opinion, there is a good reason to do otherwise; for example, where we believe disclosure will be in the best interests of the Child or other Children, or is required by law. Please review our [Safeguarding Policy](#) for more details.

### **9. Complaints**

You have the right to make a complaint at any time to the Information Commissioner’s Office (“ICO”), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### **10. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.