



GREENE'S
COLLEGE
OXFORD

Privacy Policy for Greene's Tutorial Education Limited

This policy was adopted in August 2023.

This policy is due to be reviewed in August 2024

The persons responsible for the implementation of this policy are the Managing Partners.

It is the responsibility of the Managing Partners to ensure that this policy is reviewed and updated annually.



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Privacy Policy for Greene's Tutorial Education Limited

Greene's Tutorial Education Limited (Registered in England with No. 12955116) "Greene's", 45 Pembroke Street, Oxford, OX1 1BP is the operator of our website and associated services, accessible from www.greenesoxford.com, www.greenes.org.uk, and <https://pt.greenesoxford.com/>; and through its subsidiaries, is provider of the services offered and described on this site.

Part of this site is connected to Greene's Online accessible after registration as a user. Greene's Online is software used by Greene's and its licensees to integrate many of the activities required to co-ordinate students, tutors and other administrative activities. This includes, but is not limited to, scheduling tutorials and exams, reporting on academic activities, enabling enquiries, and holding student information and records. The Intellectual Property of Greene's Online is owned and controlled by Greene's.

Greene's is responsible for the collection, processing and use of your personal data and must ensure compliance with English law and, where appropriate, applicable European law.

We take the protection of your personal data very seriously. We treat your personal data confidentially and according to prevailing legal data protection regulations as well as this Privacy Policy. In this policy we inform you which of your personal data is collected and how it is used. You will also learn how you can review the accuracy of this information and arrange for us to remove this data.

In cooperation with our hosting providers and other third parties we work with, we endeavour to protect our databases as much as possible from unauthorised access, losses, misuse or falsification. We would like to remind you that data transmission over the internet,

such as communication by email, can be subject to security vulnerabilities and complete protection of your data against access by third parties is not possible.

Consent

By using our website and otherwise engaging with Greene's, you hereby consent to this Privacy Policy and agree to its terms.

Our website can be visited without registration. Use data, such as pages accessed or names of files accessed, date and time are stored on the server for statistical purposes without this data being directly related to your person. Personal data, in particular name, address or email address are collected to the extent possible on a voluntary basis. This personal data will not be made available to third parties without your consent.

Scope of application

Personal data is all information that refers to an identified or identifiable person (you). A data subject is a person about whom personal data is processed (you). Processing includes any handling of personal data, regardless of the means and procedures used, in particular, the storage, disclosure, retrieval, deletion, recording, alteration, destruction and use of that personal data.

We process personal data in accordance with the U.K. Data Protection Act of 2018. Insofar and to the extent that the European General Data Protection Regulation (EU-GDPR) is applicable, we further process personal data in accordance with the following legal provisions in connection with Art. 6 para. 1 EU-GDPR:

- Point a) processing of personal data with the consent of the data subject.
- Point b) processing of personal data for the performance of a contract with the data subject and for the implementation of corresponding pre-contractual measures.
- Point c) Processing of personal data to discharge a legal obligation to which we are subject under any applicable EU law or under any applicable law of a country in which the EU-GDPR is applicable in whole or in part.

- Point d) The processing of personal data for the purpose of protecting the vital interests of the data subject or another natural person.
- Point e) Processing of personal data to protect the legitimate interests of us or third parties, unless the fundamental freedoms and rights and interests of the data subject prevail. In particular, legitimate interests include our business interest in being able to provide our website, information security, the enforcement of our own legal claims and compliance with English and EU laws.

We process personal data for the duration necessary for the respective purpose or purposes. In the case of longer-term storage obligations due to legal and other obligations to which we are subject, we limit the processing accordingly.

Information we collect

When you visit our website or use Greene's Online, certain data is automatically stored on our servers or on servers of services and products that we procure and/or have installed for purposes of system administration, statistics, security, or tracking. This information may include the following:

- the name of your internet service provider
- your IP address (under certain circumstances)
- the version of your browser software
- the operating system of the computer with which our website was accessed
- the date
- the time
- the website from which you are visiting our website
- the search words you used to find our website

Under certain circumstances, this data may allow conclusions to be drawn about a particular visitor. However, personal data is not used in this context.

When you order our services, we collect and use personal data from you such as your first and last name, address, email address, some academic information, possibly also payment details and possibly other data such as telephone numbers or date of birth as well as any data

voluntarily entered by you. Your data may also be enriched with data acquired from third parties such as a previous school you have attended or in obtaining a reference or additional academic information. By ordering our services and entering your data on our website, you consent to your data being used for service-related purposes.

How we use your information

We use the information we collect in various ways, including to:

- Provide, operate, and maintain our website and Greene's Online
- Improve, personalise, and expand our website
- Understand and analyse how you use our website
- Develop new services, features, and functionality
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- Send you newsletters
- Send you emails
- Allow you to make online payments
- Find and prevent fraud

Third Parties

We do not use your personal data for marketing or other advertising measures and/or marketing or other advertising purposes of any third party.

However, we do – from time-to-time – share your data with third-party providers to communicate with you and/or to process your service requests. Your data is transferred to our partners (third parties) only as far as communicating with you and/or the processing of your service requests makes it necessary such as for payment purposes.

These include partners such as Mailchimp, Wordpress, Google and others who we may use from time-to-time.

Under such circumstances we only pass on your personal data to our partners insofar as this is necessary for the performance of our contract with them and they have adequate privacy policies in place.

In addition, we will only pass on your data if we are obliged to do so by law or by official or court orders.

Log Files

Greene's follows a standard procedure of using log files. These are files that log visitors when they visit websites. All hosting companies do this and it is a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. The information in the log files is not linked to any information that is personally identifiable. The purpose of collecting log file information is for analysing trends, administering the website, tracking users' movement on the website, and gathering aggregate demographic information.

Cookies

Like any other website, Greene's uses 'cookies'. These are small text files which are stored by your web browser and which store certain settings and data for exchange with our web server. This technology allows us to recognize individual users as (returning) visitors, and to offer them individualised services and products. These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimise the users' experience by customising our web page content based on visitors' browser type and/or other information. Such cookies may also be necessary to use shopping baskets or payment functions.

You can adjust your browser settings so that no cookies are stored on your computer. The complete deactivation of cookies may result in you not being able to use all functions of our website.

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. In case they are used to provide a service that you use, it is recommended that you leave on all cookies if you are not sure whether you need them or not.

By continuing to use our website and/or by agreeing to this privacy policy, you consent to the use of cookies by us to collect, store and use your personal usage data beyond the end of your browser session. You may revoke this consent at any time by activating your browser's setting to block third-party cookies.

The Cookies We Set

When you use our website or Greene's Online, we may store a number of cookies in your web browser. Generally, we may use cookies for the following purposes: to enable certain features of our website and Greene's Online, to provide analysis and to store your preferences. We use both session and permanent cookies on our site and use various types of cookies to deliver our services:

- Account related cookies

If you create an account with us on Greene's Online then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

- Login related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

- Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- Orders processing related cookies

This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

- Site preferences cookies

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

- Statistics cookies

These cookies record device and access data in order to analyse the use of our site, such as which areas of the site are used and how, how quickly content is loaded and whether errors occur. These cookies contain only anonymous or pseudonymous information and are only used to improve our site and find out what interests our users, and to measure how effective our advertising is. Statistics cookies can be blocked without affecting the navigation and operation of the website.

Third party cookies and analytics

In addition to our own cookies, we may also use cookies provided by others to collect site usage statistics.

Our website uses Google Analytics, a web analysis service provided by Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics is one of the

most widespread and trusted analytics solutions on the internet for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

Google Analytics uses 'cookies', which are text files placed on your web browser, to help the website analyse how users use the site (see above Cookies). The information generated by the cookie (browser type/version, operating system used, referrer URL / previously visited website, IP address, time of server request) about your use of this website is generally transmitted to a Google server in the U.S. or in Europe and stored there. However, where IP anonymization is activated, your IP address will be shortened beforehand by Google within member states of the European Union or in other signatory states in the European Economic Area.

Google Analytics is used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.

From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which aspects of the website our users appreciate the most.

As we sell services it is important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this site, you consent to the processing of data about you by Google in the manner and for the purposes described above. Further information about the web analysis service used can be found on the Google Analytics website.

Instructions on how to prevent your data from being processed by the web analysis service can be found at <http://tools.google.com/dlpage/gaoptout?hl=en>.

Newsletter

If you subscribe to our newsletter, you agree that we may use the data provided by you, such as your first and last name, address, email address and any data you have voluntarily entered in your user profile, to send you the newsletter. You can unsubscribe from receiving our newsletter at any time.

Social Media

We use social media, both connected to our website and independently, to make Greene's better known. The respective social media provider is responsible for the compliance with data protection regulations. Data processing in connection with these links takes place with your consent when you use these links.

If you use the services of these social networks independently or in connection with our site, the social networks will evaluate your use of the plug-in. In this case, information about the plug-in is forwarded to the social networks and not retained or used by Greene's.

Facebook and Instagram

Our website uses a link to the social networks Facebook and Instagram, which are both offered by Meta Inc. The Facebook links are marked with a Facebook logo and the Instagram links are marked with an Instagram logo. We also have and maintain pages on both Facebook and Instagram where we publish posts and other news about Greene's.

If you access a page on our website that contains such a link, your browser establishes a direct connection to Meta's servers.

This connection provides Meta with the information that your browser has called up the corresponding page of our website, even if you do not have a Facebook or Instagram profile or are not logged on to either Facebook or Instagram. This information (including your IP

address) is transmitted directly from your browser to a Meta server in the USA or in Europe and stored there.

If you are logged in to either Facebook or Instagram, Meta can assign your visit to our website directly to your Facebook or Instagram profile. If you interact with the links, for example by pressing the 'Like' button on a Facebook post, this information is also transmitted directly to a Meta server and stored there. The information is also published on your Facebook profile and may be displayed to your Facebook friends depending on your Facebook privacy settings.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as your rights in this regard and setting options for the protection of your privacy can be found in Facebook's data protection information:

<https://www.facebook.com/privacy/policy/>

The purpose and scope of the data collection and the further processing and use of the data by Instagram as well as your rights in this regard and setting options for the protection of your privacy can be found in Instagram's data protection information:

<https://privacycenter.instagram.com/policy/>.

Twitter

Links to the Twitter Inc. short message network are integrated on our site. You can recognize the Twitter plug-ins ('Twitter' button) by the Twitter logo. If you access a page on our website that contains such a link, a direct connection is established between your browser and the Twitter server. Twitter receives the information that you have visited our website with your IP address. If you click on the Twitter button while logged into your Twitter account, you can link the content of our pages to your Twitter profile. This allows Twitter to assign the visit to our pages to your user account.

As we are not the provider of the pages on Twitter, we do not have any knowledge of the content of the data transmitted or its use by Twitter. You will find further information on this subject here: <http://twitter.com/privacy>.

LinkedIn

Whilst not available directly from our website we also manage various pages on LinkedIn.

When you access one of our pages on Linked In, a direct connection is established between your browser and the LinkedIn server. LinkedIn receives the information that you have visited our page on LinkedIn with your IP address. If you engage with our page on LinkedIn while logged into your LinkedIn account, you can link the content of our pages to your LinkedIn profile. This allows LinkedIn to assign the visit to our LinkedIn pages to your user account.

As we are not the provider of the pages on LinkedIn, we have no knowledge of the content of the transmitted data or its use by LinkedIn. Further information can be found at:

www.linkedin.com/legal/privacy-policy.

Google Maps

Google Maps services can be used on our website (e.g. in-screen or via interfaces/API). Google LLC, USA, may therefore process information about your actual location. Google uses various technologies such as IP addresses, GPS, and other sensors to track your location, such as providing Google with information about nearby devices, WLAN access points, or cell towers.

Please refer to Google's privacy policy at <https://policies.google.com/privacy?hl=en&gl=en> for the purpose and scope of data collection and the further processing and use of the data by Google, as well as your related rights and privacy settings.

Your rights

You can request information about your data stored by us at any time. We kindly ask you to send a request for information by email to the address below. Together with the request, you will need proof of your identity at the same address.

You have the possibility to request the deletion or correction of data that personally identifies you, at any time. You are of course also entitled at any time to revoke your consent to the use or processing of personal data with effect for the future.

Stored data will be deleted by us if they are no longer needed for the purpose indicated. With regard to the deletion of data, it should be noted that we are subject to certain legal obligations, which provide for certain data to be retained. We have to comply with this obligation. If you wish the deletion of data which are subject to the legal storage obligation, the data will be blocked in our system and only used to fulfil the legal storage obligations. After expiry of the retention period, your request for deletion will be complied with.

If your personal data can be processed on the basis of legitimate interests, you have the right to object to the processing of your personal data if there are reasons for doing so which arise from your particular situation or the objection is directed against direct marketing. In the latter case, you have a general right of objection, which is implemented by us without the need to indicate a particular circumstance.

Furthermore, you also have the option to receive your personal data, which you have provided to us, or to request the transfer to another responsible person.

We kindly ask you to send us an e-mail at webmaster@greenes.org.uk. You can address your message to Web Master, who is the Data Protection Officer (DPO). We reserve the right to require you to provide us with an identity card and to assume any reasonable administrative costs in advance should the effort involved be disproportionately high.

Children's Information

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

Greene's does not knowingly collect any Personal Identifiable Information from children under the age of 16. If you think that your child provided this kind of information on our

website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

Contact details

Here are our contact details:

Greene's, 45 Pembroke Street, Oxford, OX1 1BP, U.K.

Data Protection Officer (DPO): Web Master

webmaster@greenes.org.uk

Revisions of this privacy policy

The current privacy policy can be accessed via the link at the bottom of each page on www.greenesoxford.com

More Information

Hopefully that has clarified things for you and, as previously mentioned, if you are not sure whether you need to or not it is usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

If you require more information, please contact us by sending an emails to:

webmaster@greenes.org.uk