

Genki English Online - Full Privacy Notice

What is covered by this Privacy Notice?

This Privacy Notice tells you how we will collect and use your personal data to provide our services.

Your privacy protection is central to us. This is why we have adopted the EU's General Data Protection Regulation 2016/679 ("GDPR") as our standard. It is the most advanced and protective Privacy Law globally.

Under GDPR personal data is defined as: "any information relating to an identified or identifiable natural person ("Data Subject") and a Data Controller determines the purpose and means of processing personal data, whereas a Data Processor is responsible for processing data on behalf of the Data Controller.

This Privacy Notice relates to everyone whose personal data is processed by us.

Why do we need to collect and store personal data?

In order for us to provide you our services we need to collect your personal data for correspondence purposes and/or to allow us to provide you our service(s). We ensure that the information we collect and use is appropriate for this purpose. We value users' data protection and privacy rights and we have no interest in collecting any data beyond what we need to make our service(s) work for you.

If you are going to be contacted by us for marketing purposes, we will not rely solely on this Privacy Notice, but will always seek additional confirmation from you that it's ok to do that.

We always process your personal data for specific purposes, with the nature of the data collected depending on your interaction with us. We are committed to transparency in this.

Our legal bases for the processing of personal data are:

- Article 6.1(a), GDPR, Consent
- Article 6.1(b), GDPR, Contract
- Article 6.1 (c), GDPR, Legal Obligation
- Article 6.1(f), GDPR, Legitimate Interest

Do we share my personal data with anyone else?

We will never share your personal data for marketing purpose.

We may pass your personal data on to third-party contracted service providers in the course of dealing with you. We do this because there could be some services which will not work unless we are able to make these transfers. Any third parties that we share your data with are obliged to keep your details securely, and to use them only to deliver the service they provide on our and of course, your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures. We enter into Data Processing Agreements with our third-party service providers to ensure their commitment to these principles. If we need to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, or if it is necessary to comply with a contract, or we are legally required to do so. If you would like an up-to-date register of all our third-party service providers, please contact us and we will be happy to provide it.

How Genki English Online use my personal data?

We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation ("GDPR"). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We maintain a register of personal data processes which include a record of the data retention policy for each type of data collected and we commit to only process the minimum amount of data needed. We are required to retain certain information in accordance with the Law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Can I find out the personal data that Genki English Online holds about me?

At your request, we can confirm what information we hold about you and how it is processed. If we hold personal data about you, you can request information such as data collected, purpose of processing, eventual third party involved, data protection officer details, period of data storage, etc. You can any time request for correct, restrict or erase your data.

Our services are run on a server farm based in Milan, Italy, inside European Union.

Agreement to these terms of service provides explicit consent for data processing

By consenting to this Privacy Notice you are giving us permission to process your personal data specifically for the purposes identified. Where consent is required for us to process both standard and sensitive types of personal data, it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. Agreement with this Privacy Notice and its accompanying terms and conditions (as applicable) and any Data Processing Agreements, (if they apply to you) will be considered to be explicit consent and we will keep a copy of the records of that consent for audit purposes. You may withdraw consent at any time writing us by email.

Retention period and your GDPR rights

We will process different forms of personal data for as long as it is necessary and proportionate for the purpose for which it has been supplied and we will store the personal data for the shortest amount of time possible, taking into account legal and service requirements. For further details on the retention period for any particular type of data, please contact us.

Your rights as a Data Subject

At any point while we are in possession of your personal data or we process those, you, the Data Subject, have the following rights:

- right of access – you have the right to request a copy of the information that we hold about you;
- right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete;
- right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records;
- right to restriction of processing – where certain conditions apply to have a right to restrict the processing;
- right to object – you have the right to object to certain types of processing such as direct marketing;

- right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling;
- right to judicial review: in the event that Genk English Online refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the section named “Complaints” below.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with a Supervisory Authority and also with our Data Protection Officer.

For any information you can write to our Data Protection Officer (DPO) based in Milan, Italy, at help AT genkienglishonline DOT com.