

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 with us given by email or on Facebook	Consumers	Art. 6, 1 a) & b) GDPR	Information received through Microsoft Outlook, Facebook or Weebly (web host). Stored on Airtable, iCloud, Microsoft Outlook	No	Until customer requests removal – details removed from Airtable and computer on request
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, Transferwise	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	No	Held in paper format for two years following the end of the course
Marketing measures	To keep in contact with potential and former customers regarding our courses	Name, email, course interests	Consumers	Art. 6, 1 a) & b) GDPR	Facebook & Instagram, Mailchimp, Microsoft Outlook, iCloud	No	Until customer requests removal – details removed from Airtable and computer on request

Linked to our Privacy Policy, v4 – updated on 11/02/2021.

 This can be found at: <https://www.languagetree.co.uk/privacy-policy.html>

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, 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	Weebly, 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-processor:

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

Linked to our Privacy Policy, v4 – updated on 11/02/2021.

This can be found at: <https://www.languagetree.co.uk/privacy-policy.html>