



# GLOBAL DATA PROTECTION POLICY

INSPIRED EDUCATION HOLDINGS LIMITED

*“INSPIRED EDUCATION GROUP”*

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Company number 10392529

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## 1. INTRODUCTION

INSPIRED EDUCATION GROUP (also referred in this Policy as “INSPIRED”, “we” or “us” or “the Company”) is a company specialising in private education with more than 70 schools on 5 continents. Our head office is located in the United Kingdom. Inspired collects and processes data from our schools for business purposes, always under a strong commitment to abide by data protection regulations and their requirements.

The term “INSPIRED” will be referred herein to all parental companies, branches and schools affiliated to the INSPIRED GROUP.

This Policy is drafted according to Data Protection Act 2018 and UK GDPR.

## 2. PURPOSE

INSPIRED has, as one of its core values, upholding the privacy and confidentiality of all people, especially those whose personal data are processed.

In accordance with the provision above, the purpose of this Policy is to provide information about how INSPIRED collects and processes personal information.

This policy will be regularly reviewed and updated according to the regulations in force, application of new technologies and / or any change in the environment.

This Policy is available for all individuals that want to know about the Company’s data protection processes.

## 3. SCOPE

This policy is applicable to board members, temporary and permanent employees, interns, volunteers, customers, contractors and third parties (also referred herein as “individuals” or “data subjects”) interested in knowing more about us and which are part or may be related to INSPIRED, who are all encouraged to read this data protection policy and understand INSPIRED’s obligations.

This Data Protection Policy applies in addition to other Data Protection Policies such as the Data Retention Policy and Procedure for Exercise of Rights, as well as to other Global Polices including Compliance, HR, Safeguarding, Health and Safety and IT Policies.

These Policies and their updates are shared with the individuals in INSPIRED’s Intranet Global Policies Share Point.

## 4. TERMS & DEFINITIONS

The concepts used in this document are the following:

- 1. Personal Data:** Any information related to an individual or '*Data Subject*', that can be used to directly or indirectly identify the person. This can be anything from a name or address to a photograph, signature, or banking details, and includes one or more factors related to someone's health, economic, cultural or social identity.
- 2. Minor:** A data subject under the age of full legal responsibility related to data protection and especially the legal age to consent. Under the Data Protection Act 2018, the legal age to consent in United Kingdom is over 13 years old.
- 3. Data Subject:** Is any physical individual whose personal data are being collected, held or processed.
- 4. Controller:** Any organisation, person, or entity that determines the purposes and means of processing personal data, controls the data and is responsible for it, alone or jointly.
- 5. Processor:** A data processor processes the data on behalf of the controller. It is generally referred to a services provider, e.g. iSAMS, which processes our School's data, or Redfaire which processes our financial data through the platform JDE, etc.
- 6. Consent:** Is any "*freely given, specific, informed and unambiguous*" indication of the individual's wishes by which the data subject, either by a statement or by a clear affirmative action, confirms agreement to the processing of personal data by the controller for one or more specific purposes.
- 7. Data processing:** Is any operation performed on personal data, such as collection, storage, transfer, modification, deletion, etc., whether or not by automated means.
- 8. Personal information:** Any information related to an identified or identifiable natural person and that is recorded in any form. For example, a person's name, address, phone number and age.
- 9. Biometric Data:** personal data that results from specific data processing related to physical and behavioural features of a person, which allows the identification of that person (e.g., fingerprints).
- 10. Data concerning health:** Personal data referring to mental and physical health, e.g. vaccination status.
- 11. Sensitive personal data:** Data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trade union membership and criminal records.
- 12. Data Protection Officer (DPO):** A role required by UK GDPR and Data Protection Act 2018 with formal responsibility for overseeing a company's data protection strategy and its implementation to ensure compliance with the legal requirements.
- 13. Data Protection Authority (DPA):** A national authority responsible for the supervision of the implementation and protection of data and privacy as well as implementing and enforcing data protection Law. In the UK, this is the Information Commissioner's Office ('ICO').
- 14. Pseudonymisation:** The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
- 15. Profiling:** Any automated processing that uses personal data to evaluate certain personal aspects and predicts future actions and aspects relating to an individual, or to analyse or predict in particular that person's performance at work, economic situation, location, health, personal preferences, reliability, or behaviour without such individuals' intervention, that may involve consequences for that data subject.

**16. (Legal) Representative:** A natural or legal person appointed by a data subject or another Company to represent and act on their behalf under the regulation. It can also refer to a person which acts on behalf of the data subject, e.g., legal tutor of a minor.

**17. Third party:** Any natural or legal person, public authority, agency, or any other body other than the data subject, the controller, the processor, and the persons who, under the direct authority of the controller or the processor, are authorised to process data.

**18. Legitimate interests:** The rights and freedoms of those individuals which could be affected by the data processing carried out by a company or organisation. The purposes of the data processing must be based on appropriate legal grounds.

**19. Rights of the data subjects:** Data subject rights as regulated in Chap. III of UK GDPR, articles 12 to 22 and Data Protection Act 2018, referring to right of access, rectification, object, erasure ("*right to be forgotten*"), limitation of processing, portability and not to be subject to individualised decisions.

**20. Contractual safeguards:** Refers to the obligations complied with by INSPIRED when signing a contract with an external Party where personal data are involved. Refer also to Data Transfer Agreements.

**21. Personnel:** Means all directors, full-time or part-time employees at every level of INSPIRED, temporary or permanent, interns, trainees, collaborators, and any other workers of any kind who perform work or services for or on behalf of INSPIRED, including Service Providers.

**22. Data Protection regulations:** refers to the Data Protection Act 2018 and UK GDPR, and other local regulations when applicable.

**23. Adequate level of protection:** Also referred to as "*Adequacy Decision*", the European Commission recognises that personal data can flow from the EU (and Norway, Liechtenstein and Iceland) to a third country without any further safeguards being necessary as they provide adequate protection. Those third countries are: Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, United Kingdom and Uruguay.

## 5. DATA PROTECTION PRINCIPLES

**5.1. PRINCIPLES:** The Data Protection Act 2018 and UK GDPR establish in Chapter II, seven enforceable principles that must be adhered to at all times:

1. **Lawfulness, fairness and transparency:** INSPIRED shall act in compliance with the data protection legal requirements and consequently shall provide transparent and clear information to individuals about the type of data and the reason for its collection. Transparency means "*concise, transparent, intelligible and easily accessible form, clear and plain language*";
2. **Purpose limitation:** INSPIRED will only collect personal data for a specific purpose, and only for as long as necessary to complete such purpose;
3. **Data minimisation:** INSPIRED only processes the necessary personal data to achieve its processing purposes;
4. **Accuracy:** INSPIRED will take measures to ensure that personal data is accurate and updated, having regard to the purposes for which it is processed, and corrects it if not;

5. **Storage limitation:** INSPIRED will delete from its files personal data when it is no longer necessary;
6. **Integrity and confidentiality:** INSPIRED counts on the appropriate technical and organisational safeguards that ensure the security, integrity and confidentiality of the personal data.

## 5.2. ADDITIONAL REQUIREMENTS:

5.2.1. **Accountability:** UK GDPR also refers to Accountability according to what INSPIRED will be responsible to comply with the legal requirements and will have the ability to demonstrate it;

5.2.2. **Consent and appropriate Policies:** Additionally, Section 42 of Data Protection Act 2018 determines as additional requirements the safeguards for sensitive processing related to consideration of consent. INSPIRED will obtain consent from the data subjects when collection, use or disclosure of sensitive data is necessary to comply with its marketing or corporate purposes.

In these cases, INSPIRED will take the appropriate measures to make sure consent is express, including through use of “*opt-out*” consent where appropriate, e.g. marketing communications where the individual may withdraw consent at any time.

INSPIRED shall also comply with Section 42 with the implementation of the corresponding data protection policies that may fall on the regulation on retention and erasure of personal data processed in reliance on the consent of the data subject, as it is stipulated in INSPIRED Global Data Retention Policy.

5.2.3. **Security measures:** INSPIRED will take the necessary steps to guarantee that personal data are kept secured and protected by the technical and organisational measures which ensure an appropriate degree of security, integrity, confidentiality and privacy.

5.2.4. **Transfer of data:** In case INSPIRED needs to transfer personal data to a country or territory outside the United Kingdom or European Union, which has not an adequate level of data protection, the corresponding safeguards will be adopted to transfer data, such as through cross-border data transfer agreements and standard contractual clauses.

## 6. TYPES OF INFORMATION WE COLLECT AND PROCESS

INSPIRED collects and processes the following type of information:

1. **Corporate:** Financial, accounting, operational and business information about our Schools and other branches, providers, collaborators, associates and other parties or Companies that are part of our business operations;

2. **Employment:** Information about job applicants, personnel (including identification data and contact details, image, signature, payrolls, bank account details, DBS checks, location, nationality, professional and training information, position); contractors, advisors as well as those of its affiliates and third party agents engaged in supporting the Schools' business, provided directly by them or their representatives;
3. **Providers:** Information about Providers (including contact details, location, corporate and financial information)
4. **Customers:** Information about customers (including contact details, location, signature and bank account details);
5. **Marketing and commercial:** Including customers' contact details, location, educational profile and preferences.
6. **Digital:** Through our websites (Cookies) we collect from our visitors IP address, browser type, operating system and referring URLs and information on actions taken or interaction with our digital assets.

## 7. HOW WE COLLECT PERSONAL DATA

7.1. **Source:** We collect information directly, or from our Schools' corresponding departments (admissions, human resources, financial, etc), or from the individuals or their legal representatives (job applicants, candidates, employees, customers or prospective customers and providers);

7.2. **Means:**

- Postal: Paper documentation including job applications, invoices, financial and business letters, medical forms;
- Online tools: Such as apps and other software used by INSPIRED;
- Website: Online forms and cookies;
- CCTV cameras located at INSPIRED's premises;

## 8. PURPOSES OF DATA PROCESSING

8.1. The legal basis of the processing is individuals' consent, compliance with contractual and legal obligations and our legitimate interest. Such legal basis is reflected in the following purposes:

- To carry out our financial and business operations under compliance of legal requirements;
- To manage data analytics to derive trends and improve products, marketing campaigns, consumer and customer experience and services;

- To communicate with individuals including Personnel, business partners, consumers and other stakeholders;
- To safeguard the uninterrupted continuity of business operations;
- To carry out an intended sale, merger, or acquisition or other corporate transactions;
- To comply with data protection requirements, training, communication and awareness;
- To monitor compliance with due diligence policies, fraud prevention and detection;
- To act in accordance with our employment, tax, legal and contractual obligations;
- For the purposes of personnel selection and to confirm the suitability of prospective employees for our head offices, to manage employees engagement and productivity;
- To support our Schools in the provision of educational services from a financial, corporate, legal, data protection, employment, technical, material and business perspective;
- To provide, assist and monitor (as appropriate) the use of the Schools' ICT structure, educational platforms, applications or management and communication systems, elaboration of risks assessments, implementation of network and information security procedure, cloud storage;
- To support our Schools in the Direct Marketing decisions involving consent for using audio-visual or photographic images of students, parents or personnel in the Schools' publications, websites and (where appropriate) on the Schools' and INSPIRED's social media channels as well as commercial communications, suppression lists and managing communication opt-out requests, profiling, monitoring and web analytics;
- For INSPIRED's security purposes, including CCTV;
- Besides the aforementioned uses, for the support of Schools' selection and recruitment processes, assessment of suitability and qualification for the position, payrolls, entries and removals in the personnel registers, etc.;
- To assist, coordinate and monitor Schools' compliance with data protection legal requirements;
- Where otherwise reasonably necessary for INSPIRED's business interests and purposes.

**8.2. INSPIRED will not process sensitive data, except where:**

- The individuals have given their clear and explicit consent to the processing;
- To comply with varied legal and regulatory purposes (for example monitoring compliance with health and safety at workplace, diversity, among other legal obligations and duties of care).

- Processing is necessary for the purposes of carrying out INSPIRED's legal obligations, e.g., employment matters, managing Disclosure and Barring Service (DBS) checks, social security, and other applicable legal government benefits, etc;

## 9. CONSIDERATION TO DATA PROTECTION RIGHTS

INSPIRED implements the appropriate data protection policies, procedures and training to our personnel to be aware and to comply with individuals' data protection rights according to the legislation. INSPIRED provides through its corresponding policies and procedures, the means to exercise the rights to data subjects, which are the following:

- **Right of access:** Individuals can request access to their personal data;
- **Right to rectification:** Individuals have the right to obtain from the controller without undue delay the rectification of inaccurate personal data. They also have the right to have incomplete personal data completed, including by means of providing a supplementary statement;
- **Right to erasure (or "right to be forgotten"):** Individuals have the right to obtain from the controller the erasure of personal data if one of the following grounds applies: (a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) Individuals decide to withdraw their consent on which the processing is based and where there is no other legal grounds for the processing; (c) Individuals exercise their right to object to the processing and there are no overriding legitimate grounds for the processing; (d) Personal data have been unlawfully processed; (e) Personal data have to be erased for compliance with a legal obligation; (f) Personal data have been collected in relation to the offer of information society services (e.g. online educational platforms);
- **Right to restriction of processing:** INSPIRED will implement and maintain appropriate procedures to assess whether individuals' request to restrict the processing of their data can be implemented. Where the request for restriction of processing is carried out, then INSPIRED will send a communication to the individual confirming that the restriction has been implemented and when the restriction is lifted;
- **Right to data portability:** Individuals have the right to receive the data in electronic format or to give the file to another controller;
- **Right to object:** Individuals have the right to object to the processing of their personal data in specific circumstances, e.g. Marketing purposes;
- **Right not to be subject to automated decision making:** Individuals have the right not to be subject to a decision based solely on automated processing, where such decisions would have a legal or significant effect concerning them and without their intervention. At present there is no automated processing within INSPIRED. If in the future such processing is undertaken, INSPIRED will ensure that where systems are implemented, an appropriate right of appeal is available to the individuals;



- **Right to lodge a complaint before the Data Protection Authority:** As indicated previously, INSPIRED is committed to provide a request procedure whereby individuals are able to contact our Data Protection Officer. Our Data Protection Officer will support the requester to bring the complaint to a satisfactory conclusion for both parties. However, our Data Protection Officer will also support the requester in case the individual decides to file a complaint to the Data Protection Authority.

- **Right to withdraw consent:** Individuals have the right to withdraw their consent freely and at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. INSPIRED has put in place mechanisms such that withdrawal request are effected immediately.

Individuals will be able to request the exercise of their rights by sending a written request to our DPO at: [dpo@inspirededu.com](mailto:dpo@inspirededu.com).

INSPIRED will attend to the request following the procedure indicated in Chapter III of Data Protection Act 2018 within the applicable time period of *1 month* or longer under legal provisions.

Individuals will be provided with a copy of the *Global Policy of Procedure for Exercise of Rights* and the form to be used for such request.

## 10. TRANSFER OF PERSONAL DATA OUTSIDE UK

In the development of our business activities, we may need to carry out international data transfers.

Some of INSPIRED's companies as well as external third party processors may be based outside of the UK and EEA, so their processing of personal data may involve a transfer of data outside of the UK and EEA. Under Data Protection regulations, international transfers of personal data may take place if the third country ensures an adequate level of protection, and both controller and processor, provide appropriate safeguards or transfer mechanisms, through means such as an International Data Transfer Addendum (IDTA) and Standard Contractual Clauses (SCCs). Furthermore, legislation provides for derogation clauses (art. 49 UK GDPR), allowing for the transfer to take place, even where neither an adequate level of protection, nor appropriate safeguard is in place.

We may transfer the personal information to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection regulation as the country in which the information was initially collected so all the contractual safeguards will be implemented.

When we transfer information to other countries, we will comply with all aspects of the DPA 2018, UK GDPR and the local data protection regulations applicable.

## 11. STORAGE LIMITATION

INSPIRED will keep personal data for the time necessary to comply with its legal obligations and consistent with its *Global Data Retention policy*. Data will be protected by encryption methods and password protected measures where appropriate. Data will be securely erased from our files once they are no longer necessary.

INSPIRED shall use appropriate technical and organisational measures to ensure the security, confidentiality, integrity and privacy of the personal data stored, preventing unauthorised access or unlawful processing, and protecting against accidental loss, destruction or damage of the files. Once the data retention period has expired, information will be blocked or erased under the appropriate security measures.

## 12. ACCURACY OF INFORMATION

As part of our compliance with the data protection principles, INSPIRED endeavours to ensure that all the information processed is always accurate, complete and up to date. We shall implement periodical reviews in our different departments to check the accuracy of the information processed and will erase or correct any identified inaccurate personal data without undue delay, applying our *Data Retention policy*. We will also delete data that are no longer necessary in relation to the purposes for which they have been collected or otherwise processed.

## 13. SHARING INFORMATION WITH THIRD PARTIES: CONTRACTUAL MEASURES

**13.1. Legal requirements:** We will disclose personal data to third parties only in compliance with legal requirements in the following cases:

- When required by legally authorised bodies (e.g., Courts, police, social services, etc);
- On a *need-to-know basis* when a third party requires the information to comply with a specific purpose, e.g. as part of the daily operation of our business, for example to run our payroll and accounts, supportive legal advisors, etc.;
- With individuals' express consent except in cases relating to legal requirements, safeguarding of children, criminal activity, or if required by the aforementioned legally authorised bodies.

We will only share relevant information that is accurate and up to date.

**13.2. Processors:** INSPIRED will only share information with processors that provide sufficient guarantees to implement appropriate technical and organisational measures that allow us to meet our legal obligations under the data protection regulations.

INSPIRED reserves the right to adopt the appropriate data security due diligence on potential processors and monitor their compliance with applicable data protection law by the adoption of contractual clauses and annexes, questionnaires, audits, or other due diligence measures.

Where we have knowledge that a processor is using, disclosing or otherwise processing personal data in a manner contrary to data protection regulations, we will take reasonable steps to prevent or stop the use, disclosure or other processing.

INSPIRED will only work with processors through a *written contract* that sets out the conditions stipulated in Chapter 4 of Data Protection Act 2018 and UK GDPR respectively, mainly:

- Specifications of personal data shared, lawful basis, purposes for processing and types of processing, types of data subjects affected (e.g., employees, customers, etc.), obligations and rights of both Parties;
- Duration of such agreement as well as conditions for erasure or devolution of the information once the agreement has expired;
- Confidentiality commitment from the Processor;
- Processor's obligation to notify INSPIRED in the event of a data breach and to provide subsequent cooperation in reporting and remediation;
- Description of Processor's technical and organisational measures to ensure appropriate security to process our personal data;
- Processor's willingness to assist INSPIRED in complying with its legal obligations, including assistance with applicable data subject request rights, notification to INSPIRED when the Processor reasonably believes that there has been any unauthorised or accidental access, acquisition, loss, disclosure, destruction or damage to Personal Data, and informing ~~TCCC~~ INSPIRED of any inspection, audit, or inquiry made by a data protection authority or regulatory body tasked with data protection enforcement.
- Processor's employees with access to our data and provisions about Sub-Processors if necessary or other Companies that may be involved in this data sharing agreement;
- Provision of liability in case of lack of compliance by both parties.

INSPIRED will not carry out any third party service that implies sharing personal data without the fulfillment of the aforementioned contractual formality.

### 14. MINORS

INSPIRED will not collect and process data from minors (children *under the age of 13* according to Art. 9 Data Protection Act 2018) within the development of its marketing activities or any other information society services or educational activity ~~that may require~~ without parental consent or authorisation from a legal representative acting on child's behalf.

### 15. CONSENT

INSPIRED will manage the request of consent for data sharing through the use of online consent forms, with the aim of sending commercial communications to customers about our Schools' educational activities through prospectuses, leaflets, newsletters, etc by e-mail or postal mail under customer's authorisation, and always providing the means for an easy consent withdrawal.

INSPIRED will also manage, in the same terms as above, the request of consent for photographs through an online tool.

INSPIRED Schools are committed to the protection of the image of our students and we will monitor compliance with data protection regulations regarding consent to the publication of audio-visual contents and the protection of confidentiality and privacy of our students, staff and other people who may appear in our publications. Such images will be only used in our media and they won't be rented, sold or transferred to third parties outside of INSPIRED under any concept.

## 16. SECURITY OF PROCESSING

INSPIRED will take proper technical and organisational steps to ensure the security and confidentiality of personal data, preventing any kind of unauthorised or accidental access, alteration, loss, disclosure, destruction or damage.

Technical measures are those that directly affect INSPIRED's IT systems and organisational measures and refer to the system environment and to the personnel who may come into contact with personal data. INSPIRED's personnel will be made aware of this Policy as well the *Global Technology Policies* (including Acceptable Use Policy, Information Security Policy, Mobile Devices Policy, Social Media Policy and Third Party Supplier Security Policy) and their duties under data protection regulations, and will receive periodical training.

INSPIRED will ensure that the personnel who have access to personal data are required to be bound by contract and a strict confidentiality commitment, applicable data protection regulations, and INSPIRED's relevant policies that protect the security and confidentiality of personal data.

If at any time INSPIRED's personnel become aware of any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, or believe that personal data is or has been processed in violation of this Policy, it must be immediately reported to [dpo@inspirededu.com](mailto:dpo@inspirededu.com), the IT department and the Executive and Financial positions.

INSPIRED will inform the affected Individuals without undue delay, of any breach of security of their personal data where legally required, and shall provide all necessary information required by the regulations. INSPIRED will also report any such data breach to the Information Commissioner's Officer if necessary, following the steps included in the *Information security Policy*.

## 17. MANAGEMENT PLATFORMS

INSPIRED uses different platforms (cloud computing services) to manage financial, employment and educational activities (e.g., JDE, iSAMS, Success factors, etc).

These platforms store and process Personnel data, Customers' and Providers' information as well as sensitive data of employees, parents, teachers and students, strictly for the aforementioned internal purposes.

All users of these platforms have restricted access through strong security measures. These platforms are in strict compliance with the data protection regulations and assure the adoption of sufficient guarantees in case there is an international data transfer.

## 18. OUR COOKIES

We may collect information about data subjects through our websites and our online activities. We provide in our websites the option to opt out collection of personal information by automated means e.g. when visiting our websites or third-party websites and interacting with our adverts, by using the


Cookie Consent Preferences tool displayed at the websites.

## 19. IMPLEMENTATION AND MODIFICATIONS TO THIS POLICY

This Policy was enacted in May 2022 and will be available on the INSPIRED Intranet Share Point. INSPIRED personnel are obliged to take notice and review this Policy, including any amendments.

This data protection policy will be reviewed periodically to ensure continued compliance with Data Protection current regulations. INSPIRED reserves the right to modify this Policy when needed to comply with changes in laws, regulations, new practices and procedures, or requirements imposed by the Information Commissioner's Office.

### VERSIONS OF THIS POLICY

<b>VERSION 1</b> Patricia Sarraï, Inspired Global DPO Date: May 2022	Reviewed by: Alex Clement, Group Financial Controller
<b>VERSION 2</b> Date: 02/03/2023	Reviewed by: Alex Clement, Group Financial Controller
<b>FINAL VERSION</b> Date: 02/03/2023 	Approved by: Alex Clement, Group Financial Controller