

# Privacy Policy

## 1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and service users from around the world.

1.2 This privacy policy applies where we are acting as a data controller with respect to any personal data / personally identifiable information (PII) of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

We use cookies to help to identify a user and the device being used, to enhance user experience, to provide a user with access to features of the site that collect some personal data, and to monitor & improve performance, and site security. Some of the website's current and future functions, such as Search, Login, Registration Forms, depend on the use of "Necessary Cookies". We cannot provide you with these services if you choose to Opt-out below via the Tickbox. Insofar as any cookies are not strictly necessary for the provision of our website and services, we will also ask you to consent to our use of such cookies (if used) when you next visit our website. To Opt-out of the use of these cookies, check this box: Use of Browser Cookies: Some of this site's functions, such as Search, Login, Registration Forms, depend on the use of "Necessary Cookies". Such cookies may also be used by our website for monitoring & improving performance, and site security. We cannot provide these services unless you consent below via the Tickbox to the use of such cookies.

I agree to these cookies to support my use of this site:

Necessary Cookies

1.3 Depending on the services and features on our website that you may use (for example, such as Search, Login, Registration Forms and others), and your jurisdiction (within an EEA country or outside of EEA countries), our website may incorporate privacy and service controls and cookies which affect how or whether we process your personal data. By using any available privacy control or service control, you can specify whether you would like to receive registration and service-related notifications and limit the use of your information.

1.4 In this policy, a User is also referred to here as "you", "your" and "Users". The Trinity Academy of Languages Ltd, the owner of this website, is also referred to here as "we", "us" and "our". For more information about us, see Section 15.

## 2. How we use your personal data / personally identifiable information

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the specific categories of personal data that we may not obtain directly from you by submission of a form or email;
- (c) the purposes for which we may process personal data; and

(d) the legal bases of the processing.

2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data are the analytics tracking systems that we use. This usage data may be processed for the purposes of analysing the use or abuse of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services for genuine users, and monitoring against abuse of and threats to our website security and users.

2.3 We may process ("account data"). The account data may include your name and email address or other contact details you have provided (The source of the account data is you). The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper and full administration of our website and business OR the performance of an agreement or arrangement between you and us and/or taking steps, at your request, to enter into such an agreement or arrangement.

2.4 We may process your information included in your personal profile on our website ("profile data"). The profile data may include any information you have chosen to submit or provide; for example, your name, address, telephone number, email address, gender, date of birth, relationship status, interests and hobbies, educational details and employment details, company or business details, or other such information. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services, and/or fulfilling your wishes in forwarding that information to, for example, a prospective employer, recruiter or educator. The legal basis for this processing is consent OR our legitimate interests, namely the proper and full administration of our website and business OR the performance of an agreement or arrangement between you and us and/or taking steps, at your request, to enter into such an agreement or arrangement.

2.5 We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include, for example, your geographical location, IP address, name, address, telephone number, email address, gender, date of birth, relationship status, interests and hobbies, educational details and employment details, company or business details. The source of the service data is you or your company or employer. The service data may be processed for the purposes of operating our website, providing our services, monitoring and ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration and functionality of our website and business OR the performance of an agreement or arrangement between you and us and/or taking steps, at your request, to enter into such an agreement or arrangement.

2.6 We may process information that you submit, save or post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper

administration and functionality of our website and business OR the performance of an agreement or arrangement between you and us and/or taking steps, at your request, to enter into such an agreement or arrangement.

2.7 We may process information contained in any enquiry or application you submit to us or to one of the 3rd party services listed on our website, regarding goods and/or services ("enquiry data") provided by us or by a 3rd party services listed on our website. Depending on your usage of our website, the enquiry data may be processed for the purposes of forwarding your enquiry or application to a 3rd party service, or the purposes of acting on or responding to your enquiry, or the purposes of offering and selling relevant services to you related to your enquiry. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration and functionality of our website and business.

2.8 We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships OR the proper administration of our website and business.

2.9 We may review and/or process information relating to transactions, including purchases of services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions for accounting obligations and the future providing of follow-up communications and service. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships OR the proper administration of our website and business.

2.10 We may process information that you provide to us by submission or through your use of the website for the purpose of subscribing to or enabling our email notifications and/or push notifications ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications. The legal basis for this processing is consent OR the proper administration of our website and business.

2.11 We may review, rate and/or process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is consent OR the proper administration of our website and business and communications with users.

2.13 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate

interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.14 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks and threats of any type.

2.15 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.16 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Forwarding and providing your personal data / personally identifiable information to others**

3.1 We may disclose your personal data to any team member of our website insofar as reasonably necessary for the purposes of, (and on the legal bases, set out in this policy), proper administration of our website and business, and communications with users.

3.2 We may disclose your personal data and/or enquiry data to one or more of those selected third party suppliers of services (for example, educators, companies or other) identified or advertising on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the personal and/or enquiry data that we supply to it; and upon contacting you, each such third party should supply to you a copy of its own privacy policy, which will govern that third party's use of your personal and/or enquiry data.

3.5 Financial transactions relating to our website and services may be handled by our payment services providers, Easypaymentsplus.ie We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and/or refunds. You can find information about the payment services providers' privacy policies and practices at [www.easypaymentplus.ie](http://www.easypaymentplus.ie)

3.6 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal request or obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **4. International transfers of your personal data / personally identifiable information**

4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside of your current country, or countries outside of the European Economic Area (EEA).

4.2 You acknowledge that personal data that you submit as a course enquiry or job application or for publication through our website or services may be available, via the internet, around the world in countries outside of your current country. We cannot prevent the use (or misuse) of such personal data by others.

4.3 We have offices in Ireland in the EU. The European Commission has made an "adequacy decision" with respect to the data protection laws of countries such as the United States. Transfers to these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en) .

4.5 The hosting facilities for our website are situated in the United States. The European Commission has made an "adequacy decision" with respect to the data protection laws of the United States. Transfers to the United States will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en) .

## **5. Retaining and deleting personal data / personally identifiable information**

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. More precisely, personal data is kept as long as follow-up actions to Trinity Academy of Languages website are necessary with regard to the purpose(s) of the processing of personal data. For example, we may use and retain any personal data processed to either improve our service to you and/or to respond to your message or question, or to refer to a higher authority, the police or an expert in law.

5.3 We will retain your personal data / personally identifiable information (PII) as follows:

(a) The personal data of a customer received or recorded by our website will be retained for a minimum period of 48 hours following registration submission, and for a maximum period of the total length of account usage by the jobseeker following the registration date. If you submit an application for a job, only the specific registered account holder (namely a recruiter or company offering jobs or their agent) with an encrypted password for this site can log into their account to view a record on this site of the name and contact email address that you submit to them via your application. If you no longer want that application record to be available to the company, business on this site, immediately [contact us at Trinity Academy of Languages](#) to delete that application record from our database (Include your name, the name

of the company or business that you submitted your application to, and the date or approximate date of your submission).

(a) The personal data received or recorded by our website of a **person submitting an enquiry** regarding a language service will be retained for a minimum period of 2 years following submission.

(e) You may choose to contact us Trinity Academy of Languages with a question or comment, and through doing so provide us with personal data, such as an email address and name. We may keep a record of that submission or correspondence as long as follow-up actions or the historical record are deemed necessary by The Trinity Academy of Languages for the purpose of assisting with any query, solving any issue, improving our service and business, or other. We may also ask you for further information if needed for the purpose of understanding or assisting with your submission or question. We may use and retain any personal data processed to either improve our service to you and/or to respond to your message or question, or to refer to a higher authority, the police or an expert in law.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) The period of retention of the personal data received or recorded by our website of a person submitting a comment, question or support request regarding our website service will be determined based on the period of response and communication required to satisfactorily answer or resolve that comment, question or support request.

(b) The period of retention of the personal data received or recorded by our website of a person submitting a registration submission, listing entry or comment, or otherwise using our website service will be determined based on the period required by us to satisfactorily monitor and improve our website and services, and monitor against and keep records of abuse of or threats to our website security and service. For example, any personal data received or recorded by our website of a person committing abuse or acting deviously or suspiciously may be kept as a record against future such behaviour or for the purpose of supporting a legal case taken against any such user.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data / PII where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendments**

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure that you are happy with any changes to this policy.

## 7. Your Rights

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you details of your personal data OR we will explain to you where you can access your personal data by logging into your account area on our website.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. As a valid account holder, you will have the ability to log in at any time to update any such inaccurate personal data.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data may have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: For example, for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is

unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

7.9 You have the right to object to our processing of your personal data for our historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a registration, agreement or arrangement to which you are party or in order to take steps at your request prior to entering into a registration, agreement or arrangement. And where such processing is carried out by automated means, you have the right to receive your personal data from us in a structured and/or machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. If you reside within the EU, you may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to us via our [Contact Page](#) or to any Learn4Good.com email address with which you have been in correspondence (while including a clear, concise subject line in your email).



## **8. About Cookies**

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies are useful because they help us make your experience on our website more enjoyable, informative, relevant and successful. Cookies allow us to recognise your computer / device (e.g. desktop PC, laptop, tablet or mobile phone) so that we can tailor your experience of our dynamic website. When you visit a website again, a cookie may also allow that website to recognise your browser and make your experience on the website more enjoyable, personalized and successful.

8.3 You may refuse to accept cookies from The Trinity Academy of Languages by activating the setting on your web browser which allows you to refuse the acceptance of cookies. However, if you select that setting to block cookies, you will not be able to experience or use all of the features on our website, and may be unable to access certain parts or services of the Trinity Academy of Languages.

8.4 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.5 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies that we use**

9.1 Some of the website's functions depend on the use of "Necessary Cookies". Such cookies may also be used by our website for monitoring & improving performance, and site security.

Necessary cookies such as technical / session cookies are indispensable for the proper functioning of the site and provision of the service, and to execute activities and features (such as Search, Login, Registration Forms, and others) specifically requested by users through their actions on the site. Necessary cookies, that do not require an explicit prior consent to be deployed by users in the U.S. and other countries outside of the EU and EEA areas but may require an explicit prior consent to be deployed by users in the EU and EEA areas, include the following:

- Session / Status cookies - This website cannot function properly without these essential technical cookies, and can only be disabled by changing your browser preferences. Cookies used for this purpose are: jobs\_session, schools\_session, pages\_session.
- Security - We use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login data, and to protect our website and services generally against abuse or fraud. Cookies used for this purpose are: jobs\_session,

schools\_session, pages\_session.

- Statistics - Statistics (analysis) cookies help us to analyse the use and performance of our website and services, and to improve our website by collecting and reporting information on its usage. Cookies used for this purpose are: l4g\_ratings.

## **10. Advertising cookies used by 3rd party services**

10.1 For users in the U.S. and other countries outside of the EU and EEA areas, 3rd party banner / display ad service providers on this website may use cookies, and those advertising cookies may be stored on your device browser when you visit our website. We use 3rd party services to serve banner ads on this website to help support our running of and the continued existence of this website, and to simultaneously provide a much broader range of resources overall (in education, employment, travel, entertainment or other) for our visitors who are actively viewing or seeking resources related to their search or the content of interest on a page.

10.2 Currently, for users in EU and EEA countries, we do not display 3rd party banner ad service providers on this website. No advertising cookies are therefore used.

10.3 Google AdSense advertising cookies:

- For users currently outside of EU and EEA countries, we may publish Google AdSense personalized ads (interest-based advertisements) on our website. These are tailored by Google to reflect your interests and/or searches, and to also reach users based on their demographics and other criteria. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. This behaviour tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests. Google considers ads to be personalized when they are based on previously collected or historical data to determine or influence ad selection, including a user's previous search queries, activity, visits to sites or apps, demographic information, or location. Specifically, this would include, for example: demographic targeting, interest category targeting, remarketing, targeting Customer Match lists, and targeting audience lists uploaded in DoubleClick Bid Manager or Campaign Manager.

- The types of cookies used by Google is explained at <https://policies.google.com/technologies/types> .

- How Google uses cookies is explained at <https://policies.google.com/technologies/cookies> .

- How Google uses cookies in advertising, and how you can control advertising cookies is explained at <https://policies.google.com/technologies/ads> .

- Details of how Google advertising cookies work and their different types is explained at <https://policies.google.com/technologies/types> .

- Details of the reasons you might see an ad, and how Google adheres to advertising industry privacy standards are outlined on <https://support.google.com/ads/answer/1634057?hl=en> .
- How Google manages data in its ads products is explained at <https://www.google.com/policies/technologies/partner-sites/> .
- To control settings for personalized ads across your browsers and devices, and to view, delete or add interest categories associated with your browser, visit <https://adssettings.google.com> for further information.

## **12. Using data collected by Google AdSense for website analysis purposes**

This website also uses Google AdSense technology to obtain, report and analyse website traffic and usage information numerically and via graphics. The data reported to us through Google AdSense does not include and is not linked to any personal information. For the purpose of our everyday internal operations, the data from Google AdSense allows us to better monitor the use of this website, understand which parts of this website are most in demand at any time, and improve this website's user friendliness, functionality and content.

## **13. How Google uses data**

- How Google uses data when you use this site + How you can control the information sent to Google is explained at <https://policies.google.com/privacy/partners?hl=en>
- Google's privacy policy and details of how Google uses information they collect is available at <https://www.google.com/policies/privacy/>
- You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at <http://optout.networkadvertising.org> .  
However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained.
- To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at <https://support.google.com/ads/answer/7395996> .
- Mobile Advertising: Most mobile devices provide the ability to opt out of the collection and use of information from the apps you use for purposes of serving ads targeted to your interests. For more information, and to exercise these choices, consult the settings on your device.

## **14. Managing Cookies**

14.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (d) <https://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (e) <https://support.apple.com/kb/PH21411> (Safari);
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

14.2 Blocking all cookies will have a negative impact upon the usability of many websites.

14.3 If you block cookies, you will not be able to use all the features on our website.

## **15. Our Details**

15.1 This website is owned and operated by Trinity Academy of Languages Ltd.

15.2 We are registered in the Republic of Ireland under registration number 500945