



Dialogue Privacy Policy

Dialogue Language Services International Limited (“Dialogue”, “we”, “us”) is committed to safeguarding the privacy of your personal data.

Dialogue is registered with the Information Commissioner’s Office (ICO) under registration number A8739887.

Dialogue Language Services International Limited is registered in England at 1&3 Kings Meadow, Osney Mead, Oxford, OX2 0DP, company number 03663530.

If you want to ask us about our use of your personal data please contact us at info@dialogueuk.com

The Data Protection Act (“DPA”) 2018 imposes certain legal obligations on parties in connection with the processing of personal data. Dialogue is a data controller within the meaning of the DPA and we process personal data as defined within the relevant articles of the DPA.

We may amend this privacy policy from time to time. If we do so, we will supply you with and/or otherwise make available to you a copy of the amended privacy policy.

This privacy policy explains how we use any personal data we collect about you when you use this website (including the “Kudos” language education platform contained therein (the “**Platform**”)) and/or when you enter into a working relationship with us. Entering a working relationship may require us to collect personal data from you to enable us to perform our tasks to the best of our ability.

What personal data will be collected?

The personal data that we collect automatically about you from this website is limited to your IP address, browser details, operating system and cookies and, when using the Platform, payment information (including bank account and payment information), your name, address, date of birth, gender, job role, existing level of English language and your marketing email preferences .

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

Other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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| Version: 4.0 | Created by: RS | Date: 08.Aug.2024 |
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The legal bases for our intended processing of personal data

Contact details that you may submit to us via this site, or via forms we may ask you to fill in, will be processed by us. Your personal data shall be processed in accordance with Article 6 of the DPA. We will rely on the following lawful basis:

- The processing is necessary for the performance of our (potential) contract with you; or
- The processing is necessary for the purposes of legitimate interests which we may pursue.

It is not a requirement of our contract with you that you provide us with the personal data that we request, but it may make our job more difficult if you do not.

How long will we retain the data?

In order to perform the tasks required of us, we will retain relevant personal data for the duration of a contract.

- Personal contact data will be removed 24 months after the end of a contract with us.
- Performance reports will be retained for 24 months after the end of contract, as this information may be required if a student returns to continue training, unless we are instructed to destroy the data by you, the client.
- Translation memory will be retained indefinitely unless we are instructed to destroy the data by you, the client.
- Personal contact data of interested parties not pursuing a contract will be removed 24 months after contacting us.
- Personal contact data of linguists such as translators and trainers will be removed on a biennial basis, unless they opt in again, following a prompt to opt-in by Dialogue

Sharing the information

Dialogue will not share any personal data with any third parties outside the scope of work that we do for you. Only people who require the information to enhance the quality of the service for you will be permitted to access this data.

We will co-operate with all third parties to enforce their intellectual property or other rights. We will also cooperate with law enforcement requests from within or outside your country of residence. This may include disclosing your personal information to government or law enforcement agencies, regulators or private parties, when we have a good faith belief that disclosure is required by law or when we, in our discretion, believe that disclosure is necessary to protect our legal rights, or those of third parties and/or to comply with a judicial proceeding, court order, fraud reduction or legal process served on us.

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It is possible we could sell our business to a third party or re-organise our business or become insolvent. In that scenario, our database of customers is one of the biggest parts of that business and so we would need to share it with the third-party buyer and their advisers. This is in the legitimate interests of selling our business.

Your Rights

The DPA gives you certain rights in relation to your personal data. These are:

- Your right to be informed: you have the right to know how we use your personal data. This is set out in this policy.
- Your right of access: you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal data, please email the nominated data protection lead at the following address: info@dialogueuk.com
- Your right to erasure: you have the right to request that we erase your data if you consider that we do not need it any longer for the purposes for which we originally collected it as explained to you in our privacy policy and/or where you consider that we cannot show a 'legitimate interest' in continuing to process it and we have relied on that legitimate interest to process it.
- Your right to restrict processing: you have the right to ask us to suspend the processing of your personal data in the following scenarios:

(a) if you want us to establish the data's accuracy;

(b) where our use of the data is unlawful but you do not want us to erase it;

(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Your right to data portability: this right only applies to personal data you initially provided consent for us to use or where it was required for the performance of our contract with you, and we used automated means to process it. In such cases we will provide you, or any third party you have chosen to act on your behalf, with your personal data in a structured, commonly used, machine-readable format.
- Your right to object: This right applies where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

We want to make sure that your personal data is accurate and up to date. You may ask us to correct information at any time.

Withdrawal of consent

We are only required to obtain your consent to process your personal data in circumstances where we are not able to rely upon an alternative lawful processing condition. Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

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Please note:

- the withdrawal of consent does not affect the lawfulness of earlier processing.
- if you withdraw your consent, this may impact on our ability to execute the tasks we perform on your behalf.

Automated decision-making

We do not intend to use automated decision-making in relation to your personal data.

Security

All information you provide to us is stored on our servers and we have implemented reasonable and appropriate security measures to protect your personal data including limiting access to key personnel and utilising user names, passwords, encryption and anonymisation where appropriate.

Complaints

If you have requested details of the information we hold about you and you are not happy with our response, or you think we have not complied with the DPA in some other way, you can complain to us. In the first instance, please send any complaints to the nominated data protection lead: info@dialogueuk.com

If you remain dissatisfied with our response, you may complain to your local supervisory data protection authority about us depending on where you are located. In the UK, please read: <https://ico.org.uk/make-a-complaint/> for details of how to do this.

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For further information on how your information is used, please contact us on +44 (0) 1865 596980.

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