

## Privacy policy

The Data Protection Act 2018 ("DPA") imposes certain legal obligations in connection with the processing of personal data. Dialogue is a data controller within the meaning of the DPA and we process personal data.

### 1. INTRODUCTION

Dialogue Language Services International Limited is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

This privacy policy provides with details of how we collect and process personal data through general dealings with us which includes the use of our website **www.dialogueuk.com**.

### About Us

Full name of legal entity: **Dialogue Language Training Limited**

Registered address: The Island House, Midsomer Norton, Radstock, Somerset, England, BA3 2DZ, United Kingdom.

Correspondence address: Mulberry Cottage, Grafton, Oxfordshire OX18 2RY, United Kingdom.

Company Registration Number: 13460846

ICO Data Controller Registration Number: **ZB266232**

Contact Person: **Rob Shimwell**, Company Director is the primary contact for all GDPR related matters within our business. Email on [gdpr@dialogueuk.com](mailto:gdpr@dialogueuk.com) if there are any GDPR related questions.

It is very important that the information we hold is accurate and up to date. All contacts are to be made aware that if personal information changes we should be told by emailing us at [gdpr@dialogueuk.com](mailto:gdpr@dialogueuk.com).

### 2. WHAT DATA DO WE COLLECT, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data:

- **Communication Data** that includes any communication that is sent to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication. We process this data for the purposes of communicating with our contacts, for record keeping and for the establishment, pursuance

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or defense of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between contacts and us and/or taking steps at your request to enter into such a contract.
- **User Data** that includes data about how our website is used and any online services together with any data that is posted for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- **Technical Data** that includes data about use of our website and online services such as IP address, login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- **Marketing Data** that includes data about preferences in receiving marketing from us and our third parties and communication preferences. We process this data to enable contacts to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements (including LinkedIn, Google and Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we do. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send out other marketing communications. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

We do not collect any **Sensitive Data**. Sensitive data refers to data that includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect

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any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services. If we are not provided with the requested data, we may have to cancel a product or service but if we do, we will notify the person at the time.

We do not carry out automated decision making or any type of automated profiling.

We will only use personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at [gdpr@dialogueuk.com](mailto:gdpr@dialogueuk.com). In case we need to use details for an unrelated new purpose we will let the individual know and explain the legal grounds for processing.

We may process personal data without knowledge or consent where this is required or permitted by law.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We may collect data by contacts providing the data directly to us (for example by filling in forms on our site or engaging with our marketing or social media, or by sending us emails). We may automatically collect certain data via the use of our website by using cookies and similar technologies. Please see our COOKIE NOTICE for more details about this [here](#).

We may receive data from third parties such as marketing companies we work with, analytics providers such as Google based outside the UK and/or the EU, advertising networks such as Facebook based outside the UK and/or the EU, such as search information providers such as Google based outside the UK and/or the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also research contact information about you ourselves or receive data from publicly available sources such as Companies House and the Electoral Register based inside or outside the UK and/or the EU.

### **4. MARKETING COMMUNICATIONS**

Our lawful ground of processing personal data to send out marketing communications is either consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send out marketing communications if (i) a purchase has been made or information about our goods or services has been requested or (ii) the individual agreed to receive marketing communications and in each case did not opt out of receiving such communications since. Under these regulations, if an individual works for a limited company (public or private), we may send them marketing emails without consent. However these individuals can still opt out of receiving marketing emails from us at any time.

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Before we share personal data with any third party for their own marketing purposes we will get express consent.

We can be asked to stop sending marketing messages at any time by following the opt-out links on any marketing message sent out or emailing us at [gdpr@dialogueuk.com](mailto:gdpr@dialogueuk.com) at any time.

If an individual opts out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities
- Marketing companies we work with – these may include consultants or agencies, or companies whose (cloud based) applications and services we use in our daily activities to run our business
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer data to respect the security of personal data and to treat it in accordance with the law. We only allow such third parties to process personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We are subject to the provisions of the UK General Data Protection Regulations that protect your personal data. Where we transfer data to third parties outside of the UK, (e.g. cloud based services which we use in the running of our business) we will ensure that certain safeguards are in place to ensure a similar degree of security for personal data. As such:

- We may transfer personal data to countries that the relevant regulatory authorities in the United Kingdom have approved as providing an adequate level of protection for personal data by; or
- If we use US-based providers that are part of a UK regulator approved privacy framework, we may transfer data to them, as they have equivalent safeguards in place; or
- Where we use certain service providers who are established outside of the UK, we may use specific contracts or codes of conduct or certification mechanisms approved by the United Kingdom regulators which give personal data the same protection it has in the UK.

If none of the above safeguards is available, we may request explicit consent to the specific transfer. Consent may be withdrawn at any time.

## **7. DATA SECURITY**

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We have put in place security measures to prevent personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to personal data only to those employees and partners who have a business need to know such data. They will only process personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify the party and any applicable regulator of a breach if we are legally required to.

## **8. DATA RETENTION**

We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. LEGAL RIGHTS**

Under data protection laws there are rights in relation to personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

If within the UK, there is more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> If you wish to exercise any of the rights set out above, please email us at [gdpr@dialogueuk.com](mailto:gdpr@dialogueuk.com).

There is no fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive or refuse to comply with a request in these circumstances.

We may need to request specific information to help us confirm identity and ensure the right to access personal data (or to exercise any other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact an individual to request further information in relation to the request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if the request is particularly complex or there have been a number of requests. In this case, we will notify the individual.

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If within the UK and the individual is not happy with any aspect of how we collect and use data, there is the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). **We will endeavour to resolve the complaint with the individual in the first instance.**

If within the EU and the individual is not happy with any aspect of how we collect and use data, there is the right to complain to the data protection authority of the country in which they are based. **We will endeavour to resolve the complaint with the individual in the first instance.**

## **10. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data. We do not control these third-party websites and are not responsible for their privacy statements. On leaving our website, we encourage users to read the privacy notice of every website visited.

## **11. COOKIES**

Browsers may be set to refuse all or some browser cookies, or to alert the user when websites set or access cookies. If cookies are disabled or set to refuse cookies, some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please [click here](#).

For further information on how information is used, we may be contacted on 00 44 1865 596 980.

Dialogue Language Training Limited

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