

## BACKGROUND:

Shanthy Cumaraswamy Streat t/a English With a Twist understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://englishwithatwist.com/> (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy & Cookies Policy carefully and ensure that you understand it. It explains how We handle your personal data.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“Data Protection Legislation”	means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Legislation”; and
“We/Us/Our”	means Shanthy Cumaraswamy Streat t/a English With a Twist of Via Giovanni Bovio 19, Pesaro (PU), 61121, Italy.

### 2. Information About Us

Our Site <https://englishwithatwist.com/> is owned and/or operated by English With a Twist.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. Your Rights

4.1 As a data subject, you have the following rights under the Data Protection Legislation, which this Policy and Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

- 4.1.4 The right to be forgotten – i.e., the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
  - 4.1.5 The right to restrict (i.e., prevent) the processing of your personal data;
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your personal data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## 5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies):

- 5.1 name;
- 5.2 contact information such as postal addresses, email addresses and telephone numbers;
- 5.3 financial information such as bank account details and anonymised credit / debit card numbers; and
- 5.4 demographic information such as post code/zip code, preferences and interests.

## 5 **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Providing and managing your access to Our Site;
  - 6.2.2 Personalising and tailoring your experience on Our Site;
  - 6.2.3 Supplying Our products to you (please note that We require your personal data in order to enter into a contract with you);
  - 6.2.4 Personalising and tailoring Our products for you;
  - 6.2.5 Replying to emails from you;
  - 6.2.6 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by contacting us or using the unsubscribe link within any emails;
  - 6.2.7 Market research; and
  - 6.2.8 Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience.
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone and post with information, news and offers on Our products. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Legislation.
- 6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

- 6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 6.5.1 We will retain your contact details for as long as we contract with you and for 24 months thereafter;
  - 6.5.2 We will retain your contact details for 36 months if you have enquired about our services thereafter, they will be deleted;
  - 6.5.3 We will retain your contact details indefinitely if you have consented to receiving marketing materials from us and for a period of 3 months once you unsubscribe; and
  - 6.5.4 We will retain your financial information for as long as we contract with you and, thereafter, for the permitted period of time required by law.

## 7. **How and Where Do We Store Your Data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 We will store some of your personal data in the UK. This means that it will be fully protected under the UK's Data Protection Legislation.
- 7.3 We will store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.
- 7.4 We may store some or all of your personal data in countries outside of the UK and EEA. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.5 We use the following third-party software and some of your data may be stored on their servers:
- 7.5.1 Site Ground email servers;
  - 7.5.2 Site Ground cloud storage;
  - 7.5.3 PayPal;
  - 7.5.4 Stripe;
  - 7.5.5 Dubsado; and
  - 7.5.6 Get Response.
- 7.6 Steps We take to secure and protect your data include:
- 7.6.1 All devices and computers that we store your data on are password protected;
  - 7.6.2 All devices and computers that we store your data have anti-virus software and are constantly updated to the most recent operating system; and
  - 7.6.3 We only store your data on computers and devices owned by Us. We also use Contractors who may store Our data on their computers, servers and any such cloud storage they may access. We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

## 8. **Do We Share Your Data?**

- 8.1 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.2 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any

personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

8.3 We may sometimes use third party data processors that are located outside of the United Kingdom and European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK under the Data Protection Legislation including:

8.3.1 Using Standard Contractual Clauses “SCCs” as a mechanism to safely process data outside of the UK and EEA to third countries which have not been granted adequacy; or

8.3.2 Is a Country that has been granted adequacy which confirms its data protection legislation is adequate to safeguard data processing.

8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 9. **What Happens If Our Business Changes Hands?**

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy & Cookies Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## 10. **How Can You Control Your Data?**

10.1 In addition to your rights under the Data Protection Legislation, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account.

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. **Your Right to Withhold Information**

11.1 You may access Our Site without providing any data at all.

11.2 You may restrict Our use of Cookies. For more information, see section 13.

## 12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the Data Protection Legislation, no fee is payable and We will provide any and all information in response to your reasonable request free of charge. Please contact Us for more details at [shanthi@englishwithatwist.com](mailto:shanthi@englishwithatwist.com) or using the contact details below in section 14.

## **COOKIES POLICY**

### 13. **Our Use of Cookies**

13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

13.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use

some or all of the following types of Cookie:

#### 13.2.1 Strictly Necessary Cookies

A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.

#### 13.2.2 Analytics Cookies

It is important for Us to understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you use. Analytics Cookies enable us to gather this information, helping Us to improve Our Site and your experience of it.

#### 13.2.3 Functionality Cookies

Functionality Cookies enable Us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

#### 13.2.4 Targeting Cookies

It is important for Us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests.

#### 13.2.5 Persistent Cookies

Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.

#### 13.2.6 Session Cookies

Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

13.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.

13.4 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

13.5 The following first party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Purpose</b>	<b>Strictly Necessary</b>
_fbp	This cookie is set by Facebook to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising, after visiting the website.	No
fca_eoi_pagecount	This cookie is set by Cloudflare to maintain website security and caching services.	Yes
dtCookie	This cookie is set by the provider Dynatrace. This is a session cookie used to collect information for Dynatrace. Its a system to track application performance and user errors.	No

- 13.6 Our Site uses analytics services provided by Google and Hotjar. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 13.7 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 13.8 The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	First	Google	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.
_gid	First	Google	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.
_gat_gtag_UA_166105980_2	First	Google	Set by Google to distinguish users.
_hjFirstSeen	First	Google	Hotjar sets this cookie to detect the first pageview session of a user. This is a True/False flag set by the cookie.

- 13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [shanthi@englishwithatwist.com](mailto:shanthi@englishwithatwist.com) or by post at English With a Twist of Via Giovanni Bovio 19, Pesaro (PU), 61121, Italy. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

#### 15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site. This policy was last updated **8<sup>th</sup> April 2022**