

# Across Cultures Privacy Policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data. For users located in the United Kingdom, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 apply. For users located in the European Economic Area, the EU General Data Protection Regulation (EU GDPR) applies.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via <https://www.learningvillage.net/profile/edit> or
- 1.4 Processing Children's Data: Our services are used in educational environments and therefore involve the processing of personal data relating to children. Learner accounts are created and managed by schools or educators, and learners do not sign up independently. We process learner data solely for educational purposes and on behalf of the school or educational organisation. We do not use learner data for marketing, profiling beyond educational progress monitoring, or any commercial purpose. Where a parent, guardian or responsible adult purchases access to the Learning Village for a child directly, Across Cultures acts as the Data Controller for that learner's data and relies on parental or guardian consent in accordance with Article 6(1)(a) GDPR and Article 8 GDPR. Where an adult learner purchases the service directly for themselves, we act as the Data Controller for that user's data under Article 6(1)(b) GDPR. We do not require or permit children to create accounts themselves, and in all direct child enrolments communication is with the parent or legal guardian only.

## 2. How we use your personal data

- 2.1 Where we process learner data on behalf of a school or educational organisation, the legal basis for processing is the performance of a task carried out in the public interest in accordance with Article 6(1)(e) GDPR, or the performance of a contract in accordance with Article 6(1)(b) GDPR, as determined by the school or educational organisation acting as Data Controller. Where we process learner data on behalf of a school or educational organisation, we do so under a Data Processing Agreement (DPA) in accordance with Article 28 of the GDPR. A copy of our standard DPA is available on request.

In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (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 you and your learners' use of our website and services ("**usage data**"). The usage data may include your and your learners' 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 is for our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.4 We may process you and your learners' account data ("**account data**"). The account data may include your name, school, telephone number, position and email address and your learners' name, class, year and mother tongue. The source of the account data is the school or educational organisation acting on behalf of the learner, or, in the case of direct enrolment, the adult user or parent/guardian. 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 our legitimate interests, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Where an adult purchases access to the Learning Village directly, the legal basis for processing their personal data is the performance of a contract in accordance with Article 6(1)(b) GDPR.
- 2.5 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.
- 2.6. We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this

processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

- 2.7 We may process Information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.8 We may 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 our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.9 We may process your information included in your personal profile on our website] ("**profile data**"). The profile data may include your name, address, telephone. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.10 We may process any of your personal data identified in the other provisions of 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.
- 2.11 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.
- 2.12 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.3 We may disclose your personal data to our suppliers or subcontractors insofar as reasonably necessary for the performance of any contract existing between us.
- 3.4 Financial transactions relating to our website and services may be handled by our payment services providers. 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 refunds.
- 3.5 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure 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.
- 3.6 We do not share learner data with any third party for marketing or commercial purposes. Learner data is only shared with service providers necessary for delivering the platform (such as secure hosting providers), and only under contracts that ensure compliance with data protection laws. Each party is responsible for complying with its own obligations under applicable data protection laws. Schools are responsible for obtaining any required parental or guardian consents (where applicable) and for ensuring the accuracy of learner data uploaded to the platform. Across Cultures is responsible for ensuring the security and lawful processing of learner data while it is processed within the Learning Village services.
- 3.7 Across Cultures does not rely on consent from learners enrolled by their school or education organisation. Any required parental or guardian consents are the responsibility of the school or educational organisation acting as Data Controller, in accordance with Article 8 GDPR.
- 3.8 When a parent or guardian purchases a subscription for a child, or when an adult user enrolls directly, Across Cultures acts as the Data Controller for that individual's personal data. When a school or educational organisation creates learner accounts, the school acts as the Data Controller and Across Cultures acts as the Data Processor.

- 3.10 We use secure cloud hosting providers (e.g., Amazon Web Services) to store and process personal data. These providers act as data processors under contract and are bound by strict confidentiality and security obligations. Data may be stored in UK or EU data centres, and where data is transferred internationally, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses.
- 3.11 Business Communications and Support Services: We use Google Workspace, provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, to manage business communications, support requests and internal administration. This may include limited personal data such as names and contact details of school staff. We do not store learner progress data in Google Workspace. Google acts as a data processor and processes data only on our documented instructions under the terms of a Data Processing Agreement and in compliance with the GDPR.
- 3.12 Sub-Processors: In addition to AWS and Google Workspace, we may engage additional third-party service providers to support the operation of the Learning Village platform (for example, analytics services, email delivery tools, secure backup services and content delivery networks). All such providers act only on our documented instructions and are bound by contractual data protection and confidentiality obligations. A current list of sub-processors is available on request and will be updated whenever changes are made.

#### **4. International transfers of your personal data**

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA)
- 4.2 If we transfer your personal data to any country outside of the European Economic Area or the United Kingdom, we only do so if that data is protected by appropriate safeguards, including the use of standard data protection clauses adopted or approved by the European Commission or the UK government. The hosting facilities for our website are situated on Amazon Cloud Server which is based in Ireland, though we utilize CDNs (Content Delivery Networks) all over the world. The European Commission has made an "adequacy decision" with respect to [www.axcultures.com](http://www.axcultures.com) [www.learningvillage.net](http://www.learningvillage.net) adhering to UK GDPR. Transfers to any other country, which will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission
- (a) Storage Locations: Personal data is stored on secure servers located in the United Kingdom and Ireland. Where personal data originates from the European Economic Area, we ensure that any transfers are carried

out in accordance with GDPR, including the use of Standard Contractual Clauses and equivalent safeguards where required.

## 5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedures, 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.
- 5.3 We will retain and delete your personal data as follows:
- (a) *Membership and registration details* will be retained for the period you are a registrant or *4 years* following the last time you logged in, at the end of which period it will be deleted from our systems.
  - (c) Teacher and staff contact details used for newsletters, downloading of promotional materials (for example, flashcards) and service updates are retained until you unsubscribe or request removal. You can opt out of marketing communications at any time by using the unsubscribe link or contacting us.
  - (d) Learner progress data will be retained for **2 years** following the removal of the learner from the platform or closure of the school account, after which it will be securely deleted or anonymised, unless a longer retention period is required by the school acting as Data Controller.<sup>5.4</sup> 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 *membership and registration data* be determined based on the length of time elapsed since registration and any other relevant special circumstance for termination
- 5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data 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 you are happy with any changes to this policy.

6.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **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 confirm 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 a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

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.

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; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: 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 scientific or 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 consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you believe that our processing of your personal data infringes data on protection laws, you have the right to lodge a complaint with a supervisory authority. You may do so in the UK or in the EU member state of your habitual residence, place of work, or where the alleged infringement occurred. In the UK, the supervisory authority is the Information q

Commissioner's Office (ICO). More information is available at [www.ico.org.uk](http://www.ico.org.uk)

- 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 in addition to the other methods specified in this Section 7.

## **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 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.
- 8.3 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 We use cookies for the following purposes (note this list is not exhaustive and is subject to change from time to time):
- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website
  - (b) status - we use cookies to help us to determine if you are logged into our website
  - (c) personalisation - we use cookies to store information about your preferences and to personalise the website for you
  - (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
  - (e) analysis - we use cookies to help us to analyse the use and performance of our website and services

- (f) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

## **10. Cookies used by our service providers**

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website.

## **11. Managing cookies**

- 11.1 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) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

- 11.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 11.3 If you block cookies, you will not be able to use all the features on our website.

## **12. Security and Data Breach Notification**

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or alteration.

We notify the relevant Data Controller without undue delay upon becoming aware of any personal data breach affecting learner data.

All staff and contractors with access to personal data are subject to confidentiality obligations.

### **13. Our details**

- 13.1 This website is owned and operated by *Across Cultures Limited*
- 13.2 We are registered in England and Wales under registration number 8332379, and our registered office is at *11 Paprika Close, Reading RG6 5GT UK*.
- 13.3 Our principal place of business is at *11 Paprika Close, Reading RG6 5GT UK*.
- 13.4 You can contact us:
- (a) by post, using the postal address given above;
  - (b) using our website contact form;
  - (c) by telephone, on the contact number published on our website from time to time
  - (d) by email, using [the email address published on our website from time to time
- 13.5 We use industry-standard security measures to protect personal data, including encryption in transit, password-protected and role-based access controls, secure server infrastructure, and regular monitoring. Access to learner data is restricted to authenticated educators and authorised personnel only. Both Amazon Web Services and Google Workspace maintain independent third-party security certifications including ISO 27001 and SOC 2.
- 13.6 We are registered with the UK Information Commissioner's Office (ICO). Our registration number is: ZA250419 **14. Data protection officer**

- 14.1 Our data protection officer's contact details are: *Caroline Scott, Across Cultures, 11 Paprika Close, Reading RG6 5GT UK*

27/10/25

### **Appendix – Data flow diagram**

