

## **Privacy Policy**

We at GENERAL CONSULTING & SALES MGNT LTD – understand 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 our website 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 Policy carefully and ensure that you understand it.

Your acceptance of our Privacy Policy is deemed to occur upon your first use of our website.

If you do not accept and agree with this Privacy Policy, you must stop using our website immediately.

### **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.

“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 EU and UK General Data Protection Regulation (“UK GDPR/GDPR”); and Data Protection Act 2018.

“Controller of your data – We/Us/Our” means: “GENERAL CONSULTING & SALES MGNT LTD” We are a limited company registered in Companies House United Kingdom under company number: 15181451; have our registered office 128 City Road, London, United Kingdom, EC1V 2NX, Data Protection Licence - ICO No: ZB690691.

### **2. What Does This Policy Cover?**

This Privacy Policy applies only to your use of our website and our services. Our website may contain links to other websites. Please note that we provide such links for your convenience and for informational purposes only. We do not endorse or approve any of the products, services or opinions on such other websites. 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.

### **3. Data Protection Officer / EU Representative**

The company is not required to appoint a Data Protection Officer or an EU Representative; however, if you need to reach out to us regarding the protection of your personal data, please send an email to the following address: office@edu-4u.uk

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

**4.1** We collect personal data (name and surname, home address, email address, phone number, IP address, ID/Passport data, details of your educational background, employment history, and individuals who provided references) from you for one or more of the following purposes:

- To provide you with information that you have requested or that we think may be relevant to a subject in which you have demonstrated an interest (legal basis: Article 6 (1) (f) of the UK GDPR)
- To identify and present you with a suitable educational opportunity, such as a course at universities or through our educational partners in the UK, and if you express interest, to also submit an appropriate application for participation in the selected course or for its financing. (legal basis: Article 6 (1) (f) of the UK GDPR)
- To fulfil a contract that we have entered into with you or with the entity that you represent. In these circumstances it may be your entity, rather than yourself, that has provided us with your personal data (legal basis: Article 6 (1) (b) of the UK GDPR)
- To ensure the security and safe operation of our websites and underlying business infrastructure (legal basis: Article 6 (1) (f) of the UK GDPR)
- To manage any communication between you and us (legal basis: Article 6 (1) (f) of the UK GDPR)

#### **4.2** Technical information

In addition, to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following:

- Technical information, including the IP (Internet Protocol) address used to connect your device to the Internet
- Your login information, browser type and version, time zone setting, browser plug-in types and versions
- Operating system and platform

- Information about your visit, including the URL (Uniform Resource Locators) clickstream to, through, and from our site

**4.3** Our cookies policy, which can be viewed from the home page, describes in details how we use cookies.

To manage the cookies and similar technologies used (tracking pixels, web beacons, etc.) and related consents, we use the consent tool.

The legal basis for the processing of personal data in this context are Art. 6 (1) lit. c GDPR and Art. 6 (1) lit. f GDPR. Our legitimate interest is the management of the cookies and similar technologies used and the related consents.

The provision of personal data is neither contractually required nor necessary for the conclusion of a contract. You are not obliged to provide the personal data. If you do not provide the personal data, we will not be able to manage your consents.

## **5. How And How Long Do We Use Your Data?**

**5.1** All personal data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected – maximum six years from the date of the performance of the contract, or 6 years from the completion of the last course in which we participated in the application process, or 6 years from your most recent contact with our company, whichever period is longer.

We will comply with our obligations and safeguard your rights under the UK GDPR at all times.

**5.2** 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 (e.g. by placing an order with us – art. 6 (1b) UK GDPR), or it is necessary for compliance with a legal obligation to which the controller is subject (art. 6 (1c) UK GDPR), or it is necessary for the purposes of our legitimate interests – for example, personal data needed to contact you, answer your questions and consult your problem via online meetings or phone conversation (art. 6 (1f) UK GDPR).

Specifically, we may use your data for the following purposes:

**5.2.1** Providing and managing your access to our website;

**5.2.2** Personalising and tailoring your experience on our website;

**5.2.3** To assist you with your education, it is necessary for us to share your data with educational institutions. We ensure that this is done securely, only with institutions that may have relevant offerings for you and with those with whom we have an agreement regarding the processing of personal data;

**5.2.4** Replying to emails from you;

**5.2.5** Providing information and marketing materials about our company activities.

**5.3** 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.

## **6. Your Rights**

**6.1** As a data subject, you have the following rights under the UK GDPR, which this Policy and our use of personal data have been designed to uphold:

**6.1.1** The right to be informed about our collection and use of personal data;

**6.1.2** The right of access to the personal data we hold about you;

**6.1.3** The right to rectification if any personal data we hold about you is inaccurate or incomplete;

**6.1.4** The right to be forgotten – i.e., the right to ask us to delete any personal data we hold about you;

**6.1.5** The right to restrict (i.e., prevent) the processing of your personal data;

**6.1.6** The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

**6.1.7** The right to object to us using your personal data for purposes; and

**6.1.8** Rights with respect to automated decision making and profiling.

**6.2** This Policy and our internal procedures applicable to employees and associates of the company – always aim to protect your personal data.

**6.3** If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 10 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 –

<https://ico.org.uk/global/contact-us/>.

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

**7.1** To support your educational pursuits, we need to share your data with educational institutions. We want to assure you that this will be done securely, and only with institutions that have relevant offerings for you and with which we have agreements regarding the processing of personal data.

Furthermore, we only present educational offers from partners who prioritize data protection. Our employees and collaborators will always inform you about which educational institution is responsible for a specific course or program offer, as well as where you can access their Privacy Policy.

The same applies to partnerships, through which we are able to offer you assistance in obtaining financing for studies or courses in the UK.

**7.2** We may also sometimes contract with other third parties to supply goods and services to you on our behalf. These may include, IT service provider, payment processors, search engine facilities, mail service provider and sub-contractors. In some cases, these 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.

**7.3** 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.

**7.4** We may sometimes use third party data processors that are located outside the UK. Where we transfer any personal data outside the UK, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the UK GDPR.

**7.5** 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.

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

**8.1** You may access certain areas of our website without providing any data at all.

**8.2** You may restrict our use of Cookies. 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. 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.

## **9. 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). Please contact us for more details using the contact details below in section 10.

## **10. Contacting Us**

If you have any questions or concern about how we protect your personal data, please contact us by email at: [office@edu-4u.uk](mailto:office@edu-4u.uk)

Please ensure that your query is clear, particularly if it is a request for information about the data, we hold about you.

## **11. 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 and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up to date.

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