

# Data Protection Policy

Language Up Ltd takes data protection seriously and commits to protecting its clients through the safe collection, storage and use of their personal data, according to the 2018 Data Protection Act (GDPR) and the 2019 Privacy and Electronic Communications Regulations. 'Personal Data' refers to any data about a person that directly identifies them or could lead to their identification in combination with any other data.

At Language Up Ltd, our commitment to data protection means that we will:

1. Collect data only for the purposes of successfully delivering our services. We will not collect data which is not directly necessary for us to carry out our services. At Language Up Ltd, this will usually include (but is not limited to): name, email address, date of birth, mobile number, country of residence, bank details (only in the event of needing to provide a refund), other biographical data relevant to language learning.
2. Store data on a secure password-protected drive to which only the company directors have access.
3. Take particular care of the data belonging to clients based in sensitive locations.
4. Release data to other employees only when it is necessary for the delivery of our services.
5. Delete securely and completely client data within 28 days when a client relationship is no longer live (i.e. when a client course is complete), keeping only their name and email address and notes relating to sessions or progress, or;
6. Seek approval for Language Up Ltd to keep any data on our systems beyond the end of our client-company relationship.
7. Ensure the notes of sessions (particularly language mentoring sessions) are kept in the secure drive in the approved format, and destroy notes made in any other format.
8. Release any language mentoring session notes to individual clients upon request.
9. Seek the express approval of mentees/tutees to use personal data (including the content of language mentoring sessions) for the purposes of company promotion.
10. Ensure all staff and company directors are trained annually in data protection by an appropriate body.
11. Deal professionally and sensitively with complaints relating to our data protection practices.

*Document last updated: August 2024. Update required: August 2025.*