



## How We Use Your Information

### Privacy Policy

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**Express Publishing**

May 2018



## PRIVACY POLICY

### ABOUT THIS PRIVACY POLICY

Here at Express Publishing, we take all personal information you provide us with very seriously. For that reason, we have designed and implemented clear and integrated procedures that will allow us to protect and safeguard all the information we hold about you. All information submitted by you is treated in a confidential and secure way, using technical and organisational measures, and with the most efficient protection of your personal data in mind at all times.

This Privacy Policy intends to help you understand how your personal data are collected, used and processed, as well as to inform you clearly of your rights with regards to the protection of your personal data.

We strongly advise you to spend some time to read and understand how we treat and protect your personal data, and we encourage you to contact us with any questions or queries you may have regarding the protection of your personal data.

Please note that this Privacy Policy applies to all websites and applications provided by Express Publishing and its group of affiliated companies that allow a direct link to this Privacy Policy.

### 16 YEARS OLD OR YOUNGER

We are deeply concerned regarding the protection of personal data of children. Therefore, if you are under the age of 16 years or equivalent minimum age depending on jurisdiction you are advised to read this Privacy Notice with your parents or guardian. Please note that if you are under 16 years old or equivalent minimum age depending on jurisdiction, you are NOT permitted to provide us with any of your personal data, except with your parents', guardian's or teacher's explicit permission. To that end, we may use any technical means available in order for us to ensure that personal data of children under the age of 16 years or equivalent minimum age depending on jurisdiction are shared with us in a legitimate and transparent way.

Please refer to our "[Privacy Note to Parents & Teachers](#)" section for more details about your child registering to and using our services.

## WHO THE CONTROLLER OF YOUR DATA IS

Express Publishing Ltd. is a company registered in the United Kingdom under registration number 3493880 and has a wide number of branch offices and representatives around the world. It is engaged in the provision of a variety of services, including innovative teaching materials, interactive digital platform services and Certification for Vocational English.

All issues in relation to the personal data you provide to us and the way we use them are handled by our branch office in Athens, Greece, which is responsible for the processing of your personal data under the applicable data protection law.

For any question you may have regarding this Privacy Policy, the way we deal with personal data, or if you want to access any of your rights, as set out below, please contact us at the address indicated below:

Express Publishing  
Data Protection  
3-5 Mac Millan Street, 111 44  
Athens, Greece

Or email us at: [dataprotection@expresspublishing.co.uk](mailto:dataprotection@expresspublishing.co.uk)

## WHAT KIND OF INFORMATION WE MAY COLLECT ABOUT YOU

Depending on the use of our services and the level of your interaction with us, we may collect any or even all of the following information:

- contact information such as full name, address and telephone number
- account settings, such as e-mail address and password, when you open an account with our website
- personal information, such as date of birth or gender
- language school information, contact details, order history & delivery information when you use our products
- educational & professional status information, for example, if you are a teacher or a student
- navigation and browsing history when using our website and services, in order to improve our services or the way our website is displayed

### Special Categories of Personal Data

**Special categories of personal data** include personal information pertaining to medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships and any information defining sexual orientation of an individual.

Express Publishing will never request, seek or receive information pertaining to special categories of personal data from you.

### HOW WE COLLECT INFORMATION FROM YOU

In most cases this information will be submitted directly by you, after we explain to you what kind of information we require on your behalf and for what purpose we need such information. Any such information may be collected when you are registering and/or using our website, when you order our products and services or when you contact us with a query etc.

Alternatively, we may collect such information for you by third parties, for example, if you choose to register on our website through your private language school, in which case you are authorising them to provide us with your personal information or if you choose to register on our website by linking this account to your social media account (such as Twitter or Facebook), in which case you are authorising that third-party provider to share with us certain information about you.

If you are a tutor, student, or learner, we may also receive information about you from your centre or training provider when they register to receive products and/or services from us. In case you share with us information about others, such as your relatives, friends or students, you are required to ensure that they understand how their personal data will be used, as well as to guarantee that they have granted you with their explicit consent to share their data with us.

This information may also be collected by a third-party website analytics service provider on our behalf or similar information may be collected by the use of cookies during your visit to our website. For more information on cookies, please see below.

### HOW WE USE THIS INFORMATION

We will use your information for the purposes listed below either on the basis of:

- **performance of your contract with us** and the provision of our services to you;
- **your consent** (where we request it); or
- **our legitimate interests** (see details below).

Indicatively, we may use your information for the following purposes:

- to provide you with access to our website, applications and/or our services in a manner convenient and optimal and with personalised content relevant to you based on your orders history or your preferences for our products (on the basis of your consent when registering on our website and our legitimate interest to ensure our website is presented in an effective and optimal manner);
- to administer and provide you with the services you requested either individually or through your language school and/or students and to share your information with our external service providers (on the basis of performing our contract with you);
- to keep in contact with you about our news, events, new website features or services or new books and products that we believe may interest you (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so);
- to share your information with our publishing partners and associated companies, to enable them to contact you with information about things that may interest you (where we have your consent to do so);
- to provide customer service and support (on the basis of our contract with you) and deal with enquiries or complaints about the website and the provided services (on the basis of our legitimate interest in providing the correct products and services to our website users);
- to carry out aggregated and anonymised research about general engagement with our website, to develop and improve our services and products, to adopt a more user-friendly approach and to upgrade our IT systems (on the basis of our legitimate interest in providing the right kinds of products and services to our website users);
- to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity, to comply with our policies and procedures and enforce our legal rights (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so);
- to analyse your personal information and create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively (on the basis of our legitimate interest in providing the right kinds of products and services to our website users).

#### What does the term “legitimate interests” mean?

Where we refer to using your information on the basis of our “**legitimate interests**”, we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interest we have in:

- personalising, enhancing, modifying or otherwise improving the services and/or communications that we provide to you;
- detecting and preventing fraud and operating a safe and lawful business;
- improving security and optimisation of our network, sites and services.

Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours, unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing of data, please refer to details of "Your Rights to the Information We Hold about You" below.

### WHO WE MIGHT SHARE YOUR INFORMATION WITH

In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we may share your personal information with third parties that we work with such as:

- third parties we work with to deliver our business (including, for example, hosting or operating the website and our databases, website analytics providers in order to analyse our customer online behaviour, providers of technical assistance and support, financial institutions for the receipt of payment of your orders, media agencies and technical suppliers for distribution of direct marketing material etc.);
- third parties connected with the provision of our services & products, such as teachers, language schools or parents with regards to personal data of their children and solely to the extent this is required for the successful provision of our services to you and the use of our products.
- our group of companies and any selected third party that you consent to our sharing your information with for marketing purposes.

Please note that we require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

**NOTE:** Express Publishing will never sell or transfer without proper authorisation your personal information to any third party.

### HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

We operate a policy of "privacy by design" by looking for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

- ensuring the physical security of our offices, warehouses or other sites;
- ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
- maintaining a data protection policy for, and delivering data protection training to, our employees;
- limiting access to your personal information to those in our company who need to use it in the course of their work.

We will retain your information for as long as is necessary to provide you with the services that you have requested from us or until you withdraw your consent (when we hold your personal data on the legal basis of your consent) or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or due to a legal obligation or where we are permitted to do so for purposes of academic or research purposes. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it.

#### INTERNATIONAL TRANSFERS OF YOUR INFORMATION

Any and all personal data we hold are usually stored within the European Economic Area (EEA). In certain circumstances, your information may be processed outside of the EEA, for example if any of our servers are from time to time located in a country outside of the EU, where personal data may not be protected to the same extent they are protected within the EEA. In such a case, we will take all steps necessary to ensure that any of your information is adequately protected and processed in accordance with this Privacy Policy, including but not limited to, using all appropriate cross-border transfer solutions available, such as the [European Commission's Standard Contractual Clauses](#) or the [EU-US Privacy Shield Framework](#).

If you require further information on these cross-border transfer options, you may contact us directly using the contact details at the beginning of this Privacy Policy.

#### YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

Informing you about your rights under the Data Protection legislation and facilitating you in understanding and exercising your rights is of great importance to us here at Express Publishing. In this section you can find information about the rights you have and the way you can exercise any of them with Express Publishing:

- a. the right to know what kind of personal data we hold about you, how we use them and to receive a copy of such information directly from Express Publishing ([right to access](#));
- b. the right, when we hold information about you by automated means (for example, not on paper) on the legal basis of the performance of a contract with you or on the basis of your



- consent, to request that we transfer such information to another service provider in an accessible format ([right to portability](#));
- c. the right to request the rectification, correction and/or update of your personal information ([right to rectification](#));
  - d. the right to ask us to limit and restrict the processing of personal information about you ([right to restriction](#)), as well as the right to object to our processing of your personal data ([right to objection](#)), in certain circumstances;
  - e. the right to ask us not to process your personal data for marketing purposes either by following the instruction in each marketing email or by contacting us directly ([right to objection to direct marketing](#));
  - f. the right to withdraw your consent to the processing of your information in all cases where you provided us with your consent, by contacting us directly using any of the contacting details in this Privacy Policy ([right to withdrawal of consent](#));
  - g. the right to lodge a complaint about us with the Hellenic Data Protection Authority or the relevant authority in your country of work or residence ([right to complain to an Authority](#)).

You may exercise your rights above by contacting us using the contacting details in this Privacy Policy, or by following the relevant instructions in our email correspondence, especially with regards to the receipt of direct marketing services.

Please note that we may need to retain certain information for our own record-keeping and research purposes or when we are obliged to do so by law. We may also need to send you service-related communications relating to your website user account, even when you have requested not to receive marketing communications.

## DATA BREACH MANAGEMENT

In the event of a suspected breach relating to personal data and depending on the extent and seriousness of the breach, we will undertake immediately certain actions, including:

- Restricting the extent of the breach
- Undertaking the right measures for the recovery of all data
- Notifying the Authorities about the breach
- Evaluating the risk caused by the breach
- Evaluating the way we responded to the breach so as to improve

We will accordingly request guidance and advice from the Hellenic Data Protection Authority on how to manage data breaches, as well as if and when it is important to inform the personal data subject.

## ACCESSIBILITY & ACCURACY OF YOUR INFORMATION

We understand and respect your need to keep your personal information accurate and accessible. To that end, we have implemented technological and management processes and policies to maintain and secure the accuracy of all personal data we keep.

Within the scope of the exercise of your rights above, we will provide you with access to the information we hold about you, as well as with the right to rectify or supplement such information. To ensure your personal data's safety and security, we will take all reasonable measures to verify your identity, such as require the obligatory use of a combination of a username and a password, any Two Factor Authentication tools, if applicable, as well as any other technical means that may be available and appropriate.

## COOKIES

We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of the software and simplify your use of the website. For example, a temporary cookie is also used to keep track of your "session" during your navigation on our website. Without this temporary cookie you would not be able to add products to your shopping bag and purchase books via our website.

Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third-party websites or cookies and this Privacy Policy does not apply to them. Please consult the terms and conditions as well as the Privacy Policy of the relevant third party's website to find out how that website collects and uses your information and to establish whether and for what purpose they use cookies.

In order to be informed in detail regarding our Cookies Policy, please refer to the relevant section of our website, which can be accessed [here](#).

## CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Policy from time to time. We will post any changes to our website, so we encourage you to visit and review this section often.

In certain cases, we may notify you of any material changes to this Privacy Policy by e-mail.

This Privacy Policy was updated in May 2018.