

## **PRIVACY POLICY – DATA PROTECTION DECLARATION of professional language center GmbH (called plc)**

This policy applies to information of clients, contacts, teachers and all other persons about whom plc holds information. By 'information,' we mean personal information about you that we collect, use, and store. For us, confidentiality is be very important.

In this policy, "we," "us," and "our" refers to plc, a company registered in Switzerland with No. CHE-112.918.827, registered office at Am Schanzengraben 15 in 8002 Zurich, Switzerland, and "you" means the individual to whom the information relates.

### **Information we may collect**

- your name
- your contact information such as your address, email address, Skype name and telephone number
- information about you that you provide us with in relation to our cooperation, your or our job searches and assignments such as your CV, diplomas and professional qualifications (if you are a teacher).
- your correspondence with us by phone, e-mail or otherwise

### **How we collect information about you**

- Provision of information by you or third parties in the context of planning and executing language courses
- your use of the forms on our website
- your use of the forms on our profiles on third party professional sites, such as LinkedIn, XING, InterNations etc.

### **What we do with the information we gather**

We use your information to:

- provide information about our services to you, provided that you have not objected to the use of your data for this purpose
- carry out our obligations arising from any agreements entered into between you and us
- communicate with you
- administer our site and for internal operations, including inquiries, data analysis, research, statistical and survey purposes
- comply with legal and regulatory obligations
- ensure security and check your identity

## **Legal basis for processing**

Our processing of your personal information is necessary:

- for the performance of contracts to which you might or will be a party to and in order to take steps at your request prior to you entering into those contracts
- for the purposes of legitimate interests pursued by us
- in order to comply with a legal obligation to which we are subject.

In relation to any processing of special categories of personal data, we will generally rely on obtaining specific consent from you at the time unless there is otherwise a legal requirement for us to process such information.

## **Legitimate interests**

Where our processing is based on the legitimate interest grounds described above, those legitimate interests are: (i) to provide and develop our products, services and websites and other platforms, on which we are active; and (ii) for our own marketing and research.

## **Sharing Your information**

Except as expressly set out in this policy we will never sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

The personal information you provide to us may be shared with third party companies, contractors, service providers or affiliated companies if this is necessary to provide you with our services, respond to your inquiries or for any of the purposes described in this policy.

We may also share your personal information with:

- law enforcement agencies, other governmental agencies or third parties if we are required by law to do so
- other business entities in the event that should we plan to merge with, or be acquired
- another business entity, or if we undergo a re-organisation with that entity.

## **Transferring Your Information outside the EU**

Today, all our data is stored in Switzerland and the EU. Nevertheless, your personal information may be transferred to, and stored at, a destination outside the EU and may also be processed by staff operating outside the EU who work for us, or for one of our service providers.

When we, or our permitted third parties, transfer your information outside the EU, we or they will impose obligations on the recipients of that data to protect your

information to the standard required in the EU or otherwise require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where: (i) the transfer is to a country deemed to provide adequate protection of your information by the European Commission; or (ii) where you have consented to the transfer.

## **Your Rights**

At any time, you have the right:

- to request access to or a copy of any personal data which we hold about you
- to rectify your personal data, if you consider that the information we are holding is inaccurate
- to ask us to delete your personal data, if you consider that we do not have the right to hold it
- to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent)
- to ask us to stop or start sending you marketing messages as described below in the marketing section
- to restrict processing of your personal data
- to object to your personal data being processed in certain circumstances
- to not be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

Any request from you for access to or a copy of your personal data must be in writing to [info@languagecenter.ch](mailto:info@languagecenter.ch) and we will endeavour to respond within a reasonable period and in any event within one month in compliance with data protection legislation. We will comply with our legal obligations as regards your rights as a data subject.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change at the following email address [info@languagecenter.ch](mailto:info@languagecenter.ch).

## **Marketing**

If you are one of our clients or have otherwise agreed to be contacted for job searches or newsletters we may use your personal information to send you information about plc and their mandates. You can unsubscribe from receiving them at any time, details of how to unsubscribe will be included on each electronic mailing we send you.

You also have the option of “unsubscribing” from our company at any time thereby disabling any further such e-mail or other communication from being sent to you by emailing [info@languagecenter.ch](mailto:info@languagecenter.ch). We will act out request from you without delay.

## **How long will we keep your information?**

We will only keep the information we collect about you for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject.

Where we are permitted to send you direct communications, we may retain your contact information necessary for this purpose, for as long as you do not unsubscribe from receiving the same from us. If you opt out from receiving our inquiries, we will retain your information to enable us to respect your wishes to not be contacted.

## **Security**

We are committed to ensuring that your information is secure. In order to prevent un-authorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## **Links to Other Sites**

Our website may contain links to other sites, including via our social media buttons. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other websites and a link does not constitute an endorsement of that website. Once you link to another website from our website you are subject to the terms and conditions of that website, including, but not limited to, its internet privacy policy and practices. Please check these policies before you submit any data to these websites.

Certain features of our site will allow for social networking. You should ensure when using these features that you do not submit any personal data that you do not want to be sent, collected or used by other users, such as profile details or e-mail address.

## **Complaints**

Questions, comments and requests regarding this policy are welcomed and should be addressed to [info@languagecenter.ch](mailto:info@languagecenter.ch).

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## **How we use cookies**

A cookie is a small file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit our website. We use traffic log cookies to identify which pages are being used and permanent cookies to save the user preferences regarding language. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only

use traffic log information for statistical analysis purposes and then the data is removed from the system.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## **Technologies used**

### **Google Web Fonts**

We use web fonts from Google LLC in Mountain View, USA, on this site in order to display fonts in a uniform manner. When you call up a page, your browser loads these fonts into the cache so that texts are displayed correctly. In the process, your browser connects to Google servers, which tells Google that our website was accessed via your IP address. Our use of Google Web Fonts is intended to make our online content visually appealing. If your browser does not support web fonts, a default font from your computer will be used.

You can find out more about Google Web Fonts here:

<https://developers.google.com/fonts/faq>. Details on Google's data protection can be found at: <https://www.google.com/policies/privacy/>.

### **Google Tag Manager**

We use Google Tag Manager on our website, a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Tag Manager enables us to manage website tags via an interface.

The Google Tag Manager tool that implements the tags is a cookie-less domain and does not itself collect any personal data. Google Tag Manager triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. If a deactivation has been made at domain or cookie level, this remains in place for all tracking tags implemented with Google Tag Manager.

The legal basis for the data processing is the protection of our legitimate interest. The legitimate interest consists of ensuring the error-free functioning and administrability of our website. Insofar as tracking functions are also used by means of Google Tag Manager, the legitimate interest consists in enabling the use of current online marketing functions and the evaluation of the usage flows on our website.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission: <https://business.safety.google/controllerterms> and <https://business.safety.google/controllerterms/sccs>.

Further information on data protection can be found on the following Google web pages: <http://www.google.de/intl/de/policies/privacy>,

Google Tag Manager Terms of Use:

<https://www.google.com/intl/de/tagmanager/use-policy.html>

## **Google Analytics**

This website uses Google Analytics to analyse user behaviour. Cookies are used which send data to Google servers in the USA. We adhere to Swiss data protection guidelines and have activated IP anonymisation. The data improves our website and advertising. By using the website, you consent to the processing by Google. Opt-out is possible via this browser plugin

(<https://tools.google.com/dlpage/gaoptout?hl=de>). More information in Google's privacy policy (<https://support.google.com/analytics/answer/6004245?hl=de>).

## **Google Maps**

This site uses the map service Google Maps, a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

To use the functions of Google Maps, it is necessary to save your IP address. This information is usually transferred to a Google server in the USA and stored there. The provider of this site has no influence on this data transmission. If Google Maps is activated, Google may use Google Fonts for the purpose of uniform display of fonts. When you call up Google Maps, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly.

Google Maps is used in the interest of an appealing presentation of our online offers and to make it easy to find the places we have indicated on the website.

You can find more information on the handling of user data in Google's privacy policy: <https://policies.google.com/privacy?hl=de>.

## **CONTACT FORM AND E-MAIL CONTACT**

Our website contains a contact form that can be used for electronic contact. If you use this option, the data entered in the input mask will be transmitted to us and stored. In addition to the specific data in the input mask, the IP address, the date and the time of the request are collected and stored. For the processing of the data, your consent is obtained during the submission process and reference is made to this data protection declaration. Alternatively, it is possible to contact us via the e-mail address or telephone provided by us. In this case, the transmitted personal data (name, contact information, enquiry) of the user will be stored. In this context, the data may be passed on to selected third parties who are to be involved in a meaningful way in connection with the enquiry or contact. The data is used exclusively for processing the conversation. The processing of the data takes place within the framework of this data protection declaration (point 6).

## **HOW DO WE PROCESS DATA ON OUR PAGES ON SOCIAL NETWORKS?**

We may operate pages and other online presences on social networks and other platforms operated by third parties and process data about you in this context. In doing so, we receive data from you (e.g. when you communicate with us or comment on our content) and from the platforms (e.g. statistics). The providers of the platforms may analyse your usage and process this data together with other data they have about you. They also process this data for their own purposes (e.g. marketing and market research purposes and to manage their platforms), and act as their own data controllers for this purpose. For more information on processing by platform operators, please refer to the privacy notices of the respective platforms.

## **We currently use the following platforms:**

- Facebook: <https://www.facebook.com/plcprofessionallanguagecenter>  
Privacy policy: [www.facebook.com/privacy/policy](https://www.facebook.com/privacy/policy)

- LinkedIn: <https://www.linkedin.com/company/professional-language-center-gmbh>  
Privacy notice: <https://de.linkedin.com/legal/privacy-policy>

- Instagram: <https://www.instagram.com/plcprofessionallanguagecenter>  
Privacy notice: <https://help.instagram.com/155833707900388>

## **Changes to this policy**

Any changes we make to our policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our policy.

Your contact person with regard to data protection is Dagmara Müller-Wozniak, owner of plc.