

1. STATEMENT

Country Cousins (operating via Channel School of English, Ilfracombe, Devon) ("we", "us", "our") is a junior language school for students aged 7–17 from around the world. Our contact details are:

Responsible Person: Jose Brinkmann

Address: Channel School of English, Bicclescombe Park, Ilfracombe, North Devon, EX34 8JN, England

Email: help@country-cousins.com

Phone: +44 (0)1271 862834

We are the data controller under UK data protection law (UK GDPR and the Data Protection Act 2018)

2. THE INFORMATION WE COLLECT

We collect personal data to administer enrolment, run our courses, ensure welfare, and improve our service. Types of data we collect:

- 2.1 **Identity & Contact Data:** Student's name, date of birth, address, parent/guardian name and contact details.
- 2.2 **Health & Welfare Data:** Allergies, medical history, special dietary requirements, any behavioural needs and relevant safeguarding information.
- 2.3 **Preferences & Interests:** Course preferences, extra-curricular interests, language background.
- 2.4 **Accommodation Data:** information needed for homestay placement and safeguarding.
- 2.5 **Emergency Contact Details:** Family or guardian contact in case of medical or welfare emergencies.

3. LEGAL BASIS FOR PROCESSING YOUR DATA

We rely on several lawful bases under UK GDPR to process personal data:

- 3.1 **Contract:** We process data to fulfil our contract with you (e.g., enrolment, accommodation, safeguarding, teaching).
- 3.2 **Legal Obligation:** to meet UK legal requirements (e.g., child safeguarding, visa compliance, regulatory inspections).
- 3.3 **Legitimate Interests:** We use data to run the school effectively — improving our programmes, managing risk, and ensuring student welfare — without overriding your rights.
- 3.4 **Consent:** for special category data (e.g., medical information) when required, and for optional promotional photography.

4. HOW WE USE YOUR INFORMATION

We use the personal data we collect for the following purposes:

- 4.1 To manage applications and enrolments.
- 4.2 To place students in suitable homestays, based on their interests and needs.
- 4.3 To ensure student welfare (knowing about allergies, medical history, safeguarding etc.).
- 4.4 To communicate with students, parents, homestay hosts, and other relevant parties.
- 4.5 To organise and facilitate activities, trips, and lessons.
- 4.6 For internal record-keeping and to improve our courses and service.
- 4.7 To meet our legal and safety obligations (such as safeguarding and insurance).

Bicclescombe Park
Ilfracombe, North Devon
EX34 8JN, England

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- 4.8 To respond to emergencies or medical needs by sharing necessary information with relevant staff or third parties (e.g., medical providers).

We do *not* sell your personal data to third parties.

5. WHO WE SHARE YOUR DATA WITH

To operate responsibly and keep students safe, we may share data with:

- 5.1 Homestay providers
- 5.2 Teachers and activity leaders (only what is necessary for the student's welfare)
- 5.3 Emergency or medical services if required during a student's stay
- 5.4 Regulatory bodies when required by law (for example, UK immigration or safeguarding authorities)
- 5.5 Our own staff in operations, welfare, and administration, strictly on a need-to-know basis

We ensure any third parties we share data with have appropriate data protection measures in place.

6. DATA RETENTION

We will retain student personal data only for as long as is necessary for the purposes for which we collected it, including:

- 6.1 The duration of the course + any follow-up support
- 6.2 After the course, we keep key records (enrolment, health, host family) for a defined period to meet legal, safeguarding, or insurance obligations
- 6.3 We securely delete or anonymise data when it is no longer needed, in line with our data retention policy

7. YOUR RIGHTS UNDER UK GDPR

You have several rights in relation to your personal data. These include:

- 7.1 **Right to Access:** You can ask for a copy of the personal data we hold about you.
- 7.2 **Right to Rectification:** If your data is wrong or incomplete, you can ask us to correct it.
- 7.3 **Right to Erasure ("Right to be Forgotten"):** In some cases, you can ask us to delete your data.
- 7.4 **Right to Restrict Processing:** You can ask us to limit how we use your data.
- 7.5 **Right to Object:** You can object to how we process your data, especially for marketing or profiling.
- 7.6 **Right to Data Portability:** (where applicable).

To exercise any of these rights, please contact us at help@country-cousins.com or call **+44 (0)1271 862834**. You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) if you think we have mishandled your personal data.

8. DATA SECURITY

We use appropriate technical and organisational measures to protect your personal data. This includes:

- 8.1 Secure storage of electronic records
- 8.2 Restricted access to sensitive information
- 8.3 Staff training on data protection and safeguarding
- 8.4 Regular reviews of our data security procedures

Although we work hard to protect your data, transmission over the internet is never 100% secure. You provide your data at your own risk.

9. INTERNATIONAL TRANSFERS

If we need to transfer data outside the UK (for example, to overseas partners or third parties), we will only do so when:

- 9.1 Adequate safeguards are in place (e.g., UK-approved Standard Contractual Clause)
- 9.2 Transfers comply with UK GDPR.

10. COOKIES & WEBSITE ANALYTICS

10.1 We use Google Analytics (or similar) to understand how people use our website. These tools place cookies on your device to collect anonymous usage data (including your IP address).

10.2 You can block or delete cookies via your browser settings. However, this may limit some website functionality.

11. PHOTOGRAPHY & PROMOTIONAL MATERIAL

11.1 We may take group photographs or videos during activities for promotional use.

11.2 We do not take close-up identifiable headshots without permission.

11.3 If you prefer a student not to appear in promotional material, please inform us during booking.

11.4 Quotes from feedback may be used anonymously unless otherwise requested.

This aligns with our Terms & Conditions.

12. POLICY UPDATES

We may update this privacy policy from time to time (for instance, to reflect changes in the law or how we process data). When we make changes, we will:

- 12.1 Post the updated policy on our website
- 12.2 If changes are significant, notify students, parents, and other key stakeholders

13. LINKS TO OTHER WEBSITES

- 13.1 Our website may contain links to external websites. We are not responsible for their content or privacy practices.

Last updated: November 2025