



English3 Privacy Policy

7/31/2020



English3 Privacy Policy

This privacy policy will explain how our organization uses the personal data we collect from you when you use our website and services.

Topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Marketing
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage your cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

What data do we collect?

English3 collects the following data:

1. First Name
2. Last Name
3. Email
4. Date of Birth
5. Native Language
6. Country of Citizenship
7. Country of Residence
8. Gender
9. Interview Video
10. Photo of ID
11. Photo of test taker
12. University

How do we collect your data?

You directly provide English3 with the data we collect, except in cases described below.



Data is collected through online forms during registration and is stored securely within AWS servers. Test-taker personal information, including name, photo, photo of government issued ID, are necessary to confirm test-taker identity.

The test-taker can elect to share score information with university administrators, if they do, personal information, including name and photo appear on the dashboard along with their test score. Otherwise data is not shared.

English3 may receive your data indirectly from 3rd party sources

English3 data is typically captured by the applicant themselves and/or the legal guardian of potential students. If the test-taker registers for an English3 assessment directly from their institution's student information system (such as sunapsis or Terra Dotta), then only data required to create the user account will be received.

How will we use your data?

Test takers send scores to education institutions. English3 needs to collect test taker personal information in order to ensure the accuracy of test taker identity. Without this verification, identities cannot be guaranteed as authentic.

How do we protect and store your data?

We have implemented appropriate technical and organizational security measures designed to protect your User Information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law. In certain instances, we may use Secure Sockets Layer encryption and/or transfer certain User Information in a non-human readable format to provide protection. However, we cannot guarantee there will not be a breach, and we are not responsible for any breach of security or for the actions of any third parties.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement reasonable measures to protect your information, we cannot guarantee the security of your data transmitted to us using the internet. Any such transmission is at your own risk and you are responsible for ensuring that any Personal Information that you send to us are sent securely.

We take every reasonable step to ensure that your User Information that we process is accurate and, where necessary, kept up to date, and any of your User Information that we Process that you inform us is inaccurate (having regard to the purposes for which they are Processed) is erased or rectified. We take every reasonable step to ensure that your User Information that we Process is limited to the User Information reasonably necessary in connection with the purposes set out in this Policy or as required to provide you services or access to the Services.

We take every reasonable step to ensure that your user Information is only processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which we will keep your User Information are as follows: we will retain copies of your User Information in a form that permits identification only for as long as is necessary in connection with the purposes set out in this policy, unless applicable law requires a longer retention period. Unless there is a specific



legal requirement for us to keep the information, we plan to retain it for no longer than is necessary to fulfill a legitimate business need.

English3 has skilled and experienced personnel with hands on knowledge of Federal regulations and guidelines (including National Institute of Standards and Technology [NIST] publications – Guide for the Security Certification and Accreditation of Federal Information Systems standards, Government Information Security Reform Act [GISRA], Office of Management and Budget [OMB] A-130, Computer Security Act, Privacy Act, and Federal Information System Controls Audit Manual [FISCAM]). We perform Security Audits of our environment at regular intervals to ensure compliance with applicable laws and regulations and industry standards.

English3 ensures the confidentiality of its information/data by complying with the applicable laws and regulations and utilizing industry best-practices for security and privacy of information. Availability of our client's information/data, in an event of a disaster, is ensured by utilizing our robust database clustering technologies combined with our state-of-the-art business continuity and disaster recovery program. In addition, we ensure integrity of our client information/data in transit and in rest by leveraging industry best-practices and encryption technologies. English3 uses managed intrusion prevention and intrusion detection services to detect and prevent any unauthorized activities in our hosted environment.

In addition, we leverage vulnerability scanning to assess our environment at regular intervals to ensure our servers are secure. Our applications do not maintain any sensitive data in browsers cache, hidden fields or any other risk prone locations. We disallow indexing of public files by search engines.

English3 will keep your data for a period of 3 years from your most recent test attempt. Once this time period has expired, we will delete your data by performing a secure purge of the data in any and all databases or systems. Since no physical copies are stored, this logical disposal is significantly facilitated. Sensitive information, including photos of government-issued IDs, will be deleted at the completion of the test scoring at a maximum of 5 days.

Marketing

English3 will not share your data for any marketing purposes outside of English3.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop English3 from contacting you for marketing purposes or giving your data to other members of the English3 organization.

If you no longer wish to be contacted for marketing purposes, please contact us at

Phone: 480-258-2900

Email: info@english3.com OR support@english3.com

or via regular mail at:

Attention: English3 Privacy Office

Address:



3087 E Redfield
Gilbert, AZ 85234

What are your data protection rights?

English3 would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request English3 for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that English3 correct any information you believe is inaccurate. You also have the right to request English3 to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that English3 erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that English3 restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to English3's processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that English3 transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: info@english3.com OR support@english3.com

More information can be found at:

- European Union and Switzerland residents should visit the European DAA by [clicking here](#).
- Canadian residents should visit the DAA of Canada by [clicking here](#).
- U.S. residents and residents of all other countries or territories not listed above can [click here](#) for the DAA site to learn more about the use of cookies, your opt-out choices, and more.

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

How do we use cookies?

English3 leverages cookies for student information systems integration. This data is collected and leveraged for Google Analytics but this information is not correlated directly to an individual. Furthermore, users can input extra data into the web application such as address, state of residence, and phone number.



The controller has integrated the component Google Analytics (with anonymization function) on this website.

Google Analytics is a web analytics service. Web analysis is the gathering, collection and analysis of data about the behavior of visitors to websites. Among other things, a web analysis service collects data on which website a data subject has come to a website from (so-called referrers), which subpages of the website were accessed or how often and for which period of time a subpage was viewed. A web analysis is mainly used to optimize a website and for the cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google might transfer the personal information collected via this technical procedure to third parties.

As IP anonymization is activated on our website, your IP address will be shortened by Google within Member States of the European Union or other states in agreement with the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by a Google server in the USA. On behalf of the operator of the website, Google will use this information to evaluate your use of the website, compile reports on website activity and to provide further services related to website and internet use to us. The IP address transferred through your browser to Google Analytics will not be combined with other data held by Google.

In addition, this website uses the Analytics feature to track referring links. This User ID will be additionally anonymized and encrypted and will not be linked with other data.

You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible.

In addition, you may prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics.

In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Further information and Google's applicable privacy regulations can be found at <https://policies.google.com/privacy?hl=en> and <https://marketingplatform.google.com/about/>

The following link provides a further explanation of Google Analytics <https://marketingplatform.google.com/about/>.

Our website also uses Google Analytics performance reports relating to demographics and interests and reports on Google Display Network impressions. You can disable Google Analytics for display advertising and customize the ads on the Google Display Network by visiting the ad settings at this link: <https://adssettings.google.com>.

What types of cookies do we use?



English3 leverages cookies for user account connections and relay to student information systems. This is used to link English3 score report information to the appropriate user in student information systems.

How to manage cookies

You can set your browser not to accept cookies, and the below website tells you how to remove cookies from your browser.

[Google Chrome Cookies](#)

[IE and Edge](#)

For more information on Cookies, please visit: <https://www.allaboutcookies.org/>

Privacy policies of other websites

The website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

English3 keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 6/26/2020.

How to contact us

If you have any questions about English3's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Phone: 480-258-2900

Email: info@english3.com OR support@english3.com

or via regular mail at:

Attention: English3 Privacy Office

Address:

3087 E Redfield
Gilbert, AZ 85234

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that English3 has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Phone: 0-303-123-1113

Web: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns>