PRIMA GUARDIAN (PG)
Privacy Notice

Privacy Policy

When you interact with PRIMA GUARDIAN (PG), you trust us to handle your personal information with care. We will always be clear about the ways in which we intend to use your personal information, and the choices and rights you have in relation to it.

This Privacy Policy explains how we collect, use, and store your personal information in relation to your use of this website and the services we offer. It explains what your legal rights are and how you can exercise them. For example, how you can request a copy of the personal information we hold about you.

Please take the time to read this Privacy Policy; it is an important document, and you need to ensure that you understand it. If you have any questions about anything contained in this Policy, please get in touch.

You can write to us at the following address:

PRIMA GUARDIAN (PG)
1 Cherry Lane York North Yorkshire England YO241QH

Or send us an email: primaguardianuk@outlook.com

1. About us

We are PRIMA GUARDIAN (PG), referred to throughout this Privacy Policy as "PRIMA GUARDIAN (PG)", "we", "our", or "us".

We are *Guardian base in UK who is representative of international Thai boarding students' parents in England. We make sure that all your students under our supervision during their stays in England are safe and wellbeing from any harm both invisible and physical. WE are spending time to communication to students while they remain in schools and during half terms break with homestay in the UK. We make them feel we are their "Family member" Who they can trust and supports them when they need any help or talk to. Moreover, we'll make sure that their parents feel confident of our services to look after their children, together with all parties involved. So, your children always safe in us*

We are a registered our Business as self-employ (Sole trader) in England and Wales under Business number *8437462929* and our registered office is at *1 Cherry Lane York North Yorkshire England YO241QH*

For the purposes of this Policy, PRIMA GUARDIAN (PG) is the data controller, and we are registered with the Information Commissioner's Office under registration number is *ZA759861*

2. How we collect personal information

We collect personal information about you whenever you engage with us, apply for a job with us, or use one of our services.

This includes:

- When you use our website
- When you contact us via email, telephone, or post
- When you interact with us on social media platforms e.g., by posting a message on one of our accounts such as, Messenger, LINE App Instagram (IG), and our website.
- When you make a complaint
- When you contact us to exercise one of your legal rights e.g., the right to access your personal information.
- When you apply for a job with us
- When you attend a job interview
- When you register to attend an event or training course organized by us
- When you subscribe to our newsletter
- When you apply to use our services
- *When we interview or talk to you in person*

In addition, we may receive personal information about you from other individuals or organizations.

This includes:

- When an PRIMA GUARDIAN (PG) *employee* or Volunteer provides your contact details as an emergency contact
- When a job applicant gives your name and contact details as a referee
- When a referee provides information about you during the recruitment process
- When a complainant refers to you in their complaint correspondence

3. What personal information we collect about you

Personal information means any information that relates to an identified or identifiable individual.
The types of personal information we collect about you depends on the nature of your interactions with us.

Depending on the circumstances, we might collect any of the following types of information:

- Your name, address and contact details, including email address and telephone number
- Date of birth
- Financial information, such as payment related information or bank account details

- Technical information, including the type of device you are using to access our website, the Internet Protocol (IP) address, and the browser and operating system being used to connect your device to the internet.
- Information about your visit to our website, including pages you visit and how you use the website
- Details relating to a job application you have made, such as your covering letter and CV, your education and employment history, and any other information relevant to the recruitment process

In some circumstances, we may collect information about you which is sensitive. This is called special category data. We may also collect information about your criminal history. For example, if you apply for a job with us, you may be required to undertake a Disclosure and Barring Service (DBS) check.

We will discuss these types of information in more detail in **Section 4a.**

4. How we use your personal information

We must have a lawful, valid reason for using your personal information.

The main lawful reasons that we rely on to process your personal information are:

- **Contract performance:** where your personal information is necessary to enter into or perform our contract with you
- **Legal obligation:** where we need to use your personal information to comply with a legal obligation
- **Legitimate interests:** where we use your personal information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights
- **Consent:** where you have given us your consent to use your personal information (you may withdraw your consent at any time)

We may use your personal information to:

- Deal with your enquiries, requests, or complaints
- Send you details about forthcoming events and training courses which you have requested, and we feel would be of interest to you
- Send you communications which you have requested to receive from us
- Process your application for guardianship if you are a parent
- Carry out our obligations under any contracts entered into between you and us, or to meet our legal obligations to regulators, government, and/or law enforcement bodies
- Assess your suitability for a job you have applied for, and to progress your application through the recruitment process **(please see Section 4a for more information about our recruitment process)**
- Better understand how you interact with our website, including pages you visit and areas that are of most interest to you. This is so we can improve our website, the user experience, and target our audience more effectively.
- *Some Marketing purpose under our agreement*

- *Visa documents check before hands to an Agency.*
- *NHS or all relate to medical issues.*

4a. How we use your personal information during the recruitment process

When you apply for a job with us, we will collect and process your personal information. We will only collect personal information that is necessary to assess your suitability for the job you have applied for, to progress your application and keep you updated throughout the process, and to comply with any legal or regulatory obligations.

We collect personal information about you either directly from you or from a third party such as a recruitment agency.

The information we collect may include:

- Your name, address and contact details, including email address and telephone number
- Details about your qualifications (including copies of certificates), skills, experience, and employment history
- Details about any professional memberships you hold
- Information gathered from any interviews you attend
- Information about your current salary level, including benefits and pension entitlements
- Information about your right to work in the UK

In some circumstances, we may collect and process information about you which is sensitive.

This may include:

- Information about your racial or ethnic origin, religious or philosophical beliefs, or sexual orientation for the purpose of our equal opportunities monitoring
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- Information about criminal convictions and offences

As part of our recruitment process, we may ask applicants to complete an equal opportunities questionnaire. This is not mandatory; it is entirely your choice as to whether you provide us with this information and there are no adverse consequences if you choose not to.

If you do choose to provide this information to us, we will not make it available to any employees outside of our recruitment team in a way that can identify you. We will use this information to produce and monitor equal opportunities statistics.

If your application for employment is unsuccessful, we will retain your personal information for 6 months. At the end of that period, your personal information will be deleted or securely destroyed, unless we need to retain it for longer to exercise or defend any legal claims, or you have agreed that we can retain your details in our talent pool for a period of 12 months, should any suitable vacancies become available during that time.

If your application for employment is successful, any personal information gathered during the recruitment process will be transferred to your employee file and retained for the duration of your employment with us, plus a period of 6 years following the end of your employment.

When an offer of employment is made to you, we will be required to undertake pre-employment checks. For example, we may collect personal information about you from third parties, such as references from current or former employers, information from background check providers, and criminal record checks from the Disclosure and Barring Service (DBS). We will only seek this information once an offer of employment has been made to you and we will always tell you before we do this.

Once the necessary pre-employment checks have been completed, and the outcomes are satisfactory, we will collect and process additional personal information relating to your employment.

This includes:

- Your bank or building society details, so we can process your salary
- Your emergency contact details, so we know who to contact in the event of an emergency at work

You are under no statutory or contractual obligation to provide your personal information to us during the recruitment process. However, if you do not provide this information, we may not be able to process your application properly or at all or provide any reasonable adjustments during the recruitment process.

5. Who we share your personal information with

We will only share your personal information with other organisations where it is lawful for us to do so. When we share your personal information, we will only share the information that is necessary. We will always share information securely and ensure we are giving it to the right recipient.

We may share your personal information with others in the following circumstances:

- Where we are required to do so to comply with a legal or regulatory obligation. For example, we are legally required to provide information about employee income tax contributions to HMRC.
- In an emergency. For example, where we need to protect a person from serious harm.
- Where we have safeguarding concerns about a child, and we need to alert the local authority.
- Where we are required to do so to comply with the instructions of a law enforcement authority. For example, we might receive a request from the Police for personal information we hold about an individual, to help them investigate a crime.
- To protect our business interests

We may also share your personal information with third parties who provide a service to us (If any)

When we use third parties to process personal information on our behalf, they are required to follow the same rules and information security requirements as us and are not permitted to reuse your personal information for any other purpose. We only share the personal information that is necessary to deliver the service.

We will not share your personal information with third parties for marketing purposes and we will never rent or sell your personal information to any other organisation or individual.

6. How we keep your personal information safe

We have robust technical and operational security measures in place to protect your personal information against unauthorized access or unlawful use.

In addition, we limit access to your personal information to those employees, contractors, and other third parties who have a legitimate business need to know. They will only process your personal information on our strict instructions, and they are subject to a duty of confidentiality. We maintain internal policies and procedures regarding data protection and confidentiality to ensure that our employees are aware of and understand their responsibilities in relation to your personal information.

We have a robust procedure in place to deal with any suspected personal data breaches. We will notify you and the Information Commissioner's Office (ICO) of any breach within the specified timescales where we are legally required to do so.

You too can play a part in helping to keep your personal information safe. This includes choosing strong passwords, being alert to any fraudulent emails that might appear to be from us (when they are not) and using suitable anti-virus software on your device.

7. How long we keep your personal information for

We carefully consider how long we keep your personal information for and only keep it for as long as is necessary to fulfil the purpose it was collected for.

We review our data retention periods on a regular basis to ensure that personal information is not held for longer than is necessary. We regularly review the information we hold and delete or securely destroy it when we longer need it.

In some circumstances, we may anonymize your personal information (so that it can be no longer be attributed to you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Children's personal information

PRIMA GUARDIAN (PG) retains student's information in order to fulfill our role. This may include:

- Name, address, date of birth
- Details of ethnicity
- Contact details, such as phone numbers, email addresses and addresses
- School details
- Medical information
- Copies of passport, BRP and police checks
- Details of bank accounts and finances
- Details of mobile phone accounts
- Information on food preferences, interests and hobbies
- Copies of school reports
- Records of meetings held with students and schools

This information is treated as sensitive information and is stored securely as explained in this notice and is only shared with others on a need-to-know basis. PRIMA GUARDIAN (PG) may share information with staff members, homestays, and school staff. PRIMA GUARDIAN (PG) may share information with external agencies where there is a safeguarding concern.

Through this privacy notice, PRIMA GUARDIAN (PG) provides information to students and their parents about what records we hold, why we need to hold them and who we might share their information with (for example as part of a multi-agency child protection team) (Information Commissioner's Office, 2021). If we are keeping records for child protection reasons, please note that we don't necessarily need to get consent from the adults and/or children concerned.

We will store general student records for *[add retention time here]*.

Child Protection Records

PRIMA GUARDIAN (PG) is required to keep child protection records where there has been a safeguarding concern. These will be stored separately to other information in a secure file. There will be one file for each child and access is limited to the DSL and DDSL If it is necessary to share records (within our organisation or externally), we will ensure that they are kept confidential. We will use passwords and encryption when sharing electronic files. If the person responsible for managing our child protection records leaves PRIMA GUARDIAN (PG) will appoint somebody to take over their role and arrange a proper handover.

We will store any child protection records until a child turns 25

9. Marketing

We will keep you up to date with our latest news and details about any services, upcoming events or training courses if you have told us that you are happy to receive marketing communications from us.

If you decide that you no longer want to hear from us, you can opt-out at any time. You can do this by contacting us using the details contained in this Policy, or by clicking on the 'unsubscribe' link contained in any email marketing communication you receive from us.

10. Links to third-party websites and services

This website may include links to other websites and applications that are operated by third parties.
For example, we provide links to websites of other organisations, including accredited guardianship organisations and member schools. When you click on one of these links, you will be directed to that website.

We do not have any control over these third-party websites, and we cannot take any responsibility for any information you might give to them.

When you leave our website, we encourage you to read the privacy notice of every website you visit so you can understand how that website will collect and use your personal information.

11. Cookies

A cookie is a small file of letters and numbers which is downloaded to your device when you access a website. When you visit a website, that site will ask your device for permission to store this file.

Cookies are used by many websites and have several different uses. For example, they can remember your preferences and count the number of people who have visited a website or webpage

At PRIMA GUARDIAN (PG), we use Facebook through our official page: https://www.facebook.com/Primaguardian. Facebook may use both session cookies and persistent cookies in accordance with its own policies and settings.

Our Facebook page is used to share updates, receive comments, and feedback, and provide information about cultural and traditional differences to help students adapt comfortably to their new environment. We also share other relevant information and updates. Visitors to our Facebook page may contact us through Facebook Messenger.

We maintain an official website at www.primaguardian.com, which is publicly accessible and provides information about our organisation and services. Visitors may also contact us through the website.

In addition, we operate a private Instagram account for our clients (parents and students) and individuals involved in supporting student safeguarding and welfare. This may include host families (Nominated Guardians), agents, family members, Designated Deputy Safeguarding Leads (DDSLs), volunteers, staff members, and other individuals who assist us in fulfilling our safeguarding responsibilities.

Access to this private Instagram account is restricted and is not shared with the general public. Membership and access are granted only with the approval of the PG Director/Owner and in accordance with our safeguarding, privacy, and data protection requirements.

'Session cookies' are those which expire at the end of your browser session. They allow a website to recognize and link the actions of a user during a browsing session. This means we can gather statistics to help us understand how our website is being used, and to improve its structure.

'Persistent cookies' are stored on a user's device in between browsing sessions. They help us to recognize you as a unique visitor to our website and allow us to tailor the content of certain areas.

You can use your web browser to accept, decline, or delete cookies. You can also clear cookies at the end of your browsing session. Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. This may, however, prevent you from taking full advantage of our website.

12. Your legal rights

We want to ensure that you are always in control of your personal information.

We have outlined below what your legal rights are in relation to your personal information, together with details as to how you can exercise them.

- **The right to access your personal information**

  You have the right to request a copy of the personal information we hold about you.

- **The right to edit and update your personal information**

  You have the right to request that your personal information is rectified if it is inaccurate or incomplete.

- **The right to request to have your personal information erased (also known as the 'right to be forgotten')**

  You have the right to request that your personal information is erased. However, this is not an absolute right, and it only applies in certain circumstances. For example, the law may require us to keep some types of personal information for a specific period of time.

  We will review each request on a case-by-case basis.

- **The right to restrict the processing of your personal information**

You have the right to request the restriction or suppression of your personal information. However, this is not an absolute right, and it only applies in certain circumstances.

When processing is restricted, we will continue to store your personal information, but we will not use it.

- **The right to object to your personal information being used**

  You have the right to object to the processing of your personal information at any time. However, this is not an absolute right, and it only applies in certain circumstances.

  You do, however, have an absolute right to stop your personal information being used for direct marketing purposes.

- **The right to data portability**

  You have the right to request that we transfer your personal information from one organisation to another or give it to you. This right only applies to information that you have provided to us and is held electronically.

- **The right to complain to a supervisory authority if you believe we have not handled your personal information in accordance with data protection laws**

  You can make a complaint or raise a concern about how we process your personal information by contacting us using the details set out below.

  If you are not happy with how we have handled your complaint, or you believe that your data protection or privacy rights have been infringed, you have the right to complain to the Information Commissioner's Officer (ICO). The ICO is the UK's independent body established to uphold information rights.

If you wish to exercise any of the rights outlined in this section, please write to us at the following address:

PRIMA GUARDIAN (PG) Address : 1 Cherry lane York North Yorkshire England YO241QH

Or send us an email: *primaguardianuk@outlook.com*

We will endeavour to respond to all requests without delay, and in any event within one month of receiving your request. There may be circumstances when we need to extend the time limit for responding to a request. We will tell you if this is the case and keep you informed.

Before responding to a request, we may be required to ask for further information and/or proof of your identity.

Please keep in mind that there are exceptions to the rights outlined above and although we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

13. Changes to our Privacy Policy

This Privacy Policy will be regularly reviewed and may change from time to time. If it does, the most current version will always be available on this website.

We will keep our privacy notice under regular review. Our privacy notice will be next reviewed in 3 years or sooner if data protection legislation changes in the interim, therefore the review date will be 22 June 2029

This privacy notice was last reviewed on: 22 June 2026

Signed: ……

(Buppha Somngam Steer)

Managing Director

Date : 2 2 June 2026