Privacy Policy

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Professional English training designed around the learner - not the course.

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Madrid, Spain

http://www.cwenglish.com/

Document Control

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This document is the official Privacy Policy of CW English and should be read together with the Terms and Conditions, Cookie Policy, Individual Learning Agreement and Individual Pricing & Payment Guide where applicable.

This document will be reviewed periodically to ensure continued compliance with applicable data protection legislation and to reflect changes in CW English services.

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Introduction

Thank you for choosing CW English.

At CW English, we believe that trust is built through transparency. Whether you are making an enquiry, completing an English Level Assessment, registering as a learner, or participating in one of our English training programmes, we are committed to protecting your personal information and handling it responsibly.

This Privacy Policy explains how **C. Warwick English S.L.**, trading as **CW English**, collects, uses, stores, protects and processes your personal information throughout your relationship with us.

We are committed to processing personal information fairly, lawfully and transparently in accordance with the **General Data Protection Regulation (GDPR)**, the **Spanish Organic Law on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD)**, and any other applicable data protection legislation.

This Privacy Policy applies to all users of the CW English website and to individuals or organisations who enquire about, register for or participate in CW English services, including:

- Individual English learners
- Company representatives
- Employees participating in company training programmes
- Visitors to the CW English website
- Individuals who contact CW English by email, telephone or through our online forms

This Privacy Policy should be read together with the following CW English documents where applicable:

- Individual Learning Agreement
- Individual Pricing & Payment Guide
- Terms and Conditions
- Cookie Policy
- Any company training agreement issued by CW English

By using our website or engaging with our services, you acknowledge that your personal information may be processed as described within this Privacy Policy.

Our goal is to collect only the information necessary to deliver professional English training, administer our services, communicate effectively with learners and clients, and continually improve the quality of our educational programmes while respecting your privacy.

About CW English

The organisation responsible for processing your personal information is:

C. Warwick English S.L.

Trading Name: **CW English**

Website: **www.cwenglish.com**

Email: **info@cwenglish.com**

Telephone: **+34 641 141 045**

Address:

Bahía de Alcudia 75
28042 Madrid
Spain

For the purposes of applicable data protection legislation, C. Warwick English S.L. acts as the **Data Controller** for the personal information collected through the CW English website and educational services.

As the Data Controller, we determine how and why personal information is collected, processed and stored in order to provide our services and comply with our legal obligations.

Information We Collect

The information we collect depends on how you interact with CW English and the services you request. We are committed to collecting only the personal information necessary to provide our educational services, administer your learning programme and meet our legal obligations.

The information collected may vary throughout your learner journey.

Website Visitors

When you visit the CW English website, certain technical information may be collected automatically to help operate and improve the website.

This may include:

- IP address
- Browser type and version
- Device information
- Operating system
- Date and time of your visit
- Pages visited
- Referral website
- Cookie information (where applicable)

This information is primarily used for website security, performance monitoring and improving the user experience.

Website Enquiries

If you contact CW English through our website, email or telephone, we may collect:

- Full name
- Email address
- Telephone number
- Company name (where applicable)
- Job title (where applicable)
- Country or city
- Your enquiry
- Preferred lesson type
- Preferred contact method

This information enables us to respond to your enquiry and determine whether our services are appropriate for your needs.

Student Registration

When you register for CW English services, we may collect:

- Full name
- Username
- Email address
- Telephone number
- Country
- City
- Company name (where applicable)
- Department (where applicable)

This information is used to create and administer your CW English learner account.

Personal Learning Profile

To design a personalised learning programme, we ask learners to complete a Personal Learning Profile.

This may include information relating to:

- Educational background
- Professional background
- Current English use
- Workplace communication
- Learning objectives
- Areas of confidence
- Areas requiring improvement
- Preferred learning themes
- Motivation for learning English

This information helps us design a learning programme tailored to your individual or professional needs.

English Level Assessment

Our English Level Assessment is designed to evaluate your current English ability.

Assessment records may include:

- Grammar results
- Vocabulary results
- Reading performance
- Listening performance
- Writing performance
- Speaking assessment (where applicable)
- Estimated CEFR level
- Teacher observations
- Learning recommendations

Assessment results are used solely for educational purposes and to help determine an appropriate learning pathway.

Lesson Scheduling

When arranging your lessons, we may collect:

- Preferred days
- Preferred lesson times
- Availability
- Lesson frequency
- Delivery preference (online or face-to-face)
- Lesson package selection
- Schedule confirmations

This information allows us to organise your personalised lesson schedule.

During Your Training

Throughout your programme, CW English may maintain educational and administrative records including:

- Lesson attendance
- Lesson history
- Progress records
- Curriculum information
- Certificates issued
- Student evaluations
- Administrative communications
- Payment records
- Invoices
- General correspondence relating to your training

These records help us deliver a consistent, high-quality learning experience and maintain accurate educational and business records.

Company Training

Where English training is provided to a company or organisation, additional information may be collected, including:

- Company details
- Contact person
- Employee information provided by the company
- Department information
- Training objectives
- Group recommendations
- English Level Assessment results
- Communication Audit information (where applicable)

Company information is processed only for the purpose of delivering the agreed training services and administering the training programme.

Special Category Data

CW English does not intentionally request or collect special category personal data (such as information relating to health, race, religion, political opinions or biometric data) unless it is genuinely necessary to provide reasonable adjustments or comply with applicable legal obligations.

If such information is voluntarily provided, it will be processed only where there is an appropriate lawful basis under applicable data protection legislation.

Why We Use Your Information

CW English processes personal information only where it is necessary to provide our educational services, administer learner programmes, communicate with learners and clients, and comply with our legal obligations.

We do not collect personal information for purposes unrelated to the services we provide.

Depending on your relationship with CW English, your information may be used for one or more of the following purposes.

Responding to Enquiries

When you contact CW English, we use your information to:

- Respond to your enquiry.
- Provide information about our services.
- Arrange consultations where appropriate.
- Determine whether our services are suitable for your needs.
- Maintain records of communications.

Student Registration

Information collected during registration is used to:

- Create your learner account.
- Verify your identity where appropriate.
- Maintain accurate learner records.
- Contact you regarding your programme.
- Administer your enrolment.

Personal Learning Profile

Information contained within your Personal Learning Profile is used to:

- Understand your learning objectives.
- Identify your professional or personal communication needs.
- Design a personalised learning pathway.
- Recommend appropriate lesson content.
- Support curriculum planning.

Your Personal Learning Profile is used exclusively for educational purposes and is not used for automated decision-making.

English Level Assessment

Assessment information is used to:

- Evaluate your current English ability.
- Estimate your CEFR level.
- Identify strengths and areas for improvement.
- Recommend an appropriate starting level.
- Support lesson planning.
- Measure progress throughout your programme.

Assessment results are intended to support educational decisions made by CW English and are not used as the sole basis for automated decisions.

Lesson Scheduling

Scheduling information is used to:

- Organise lesson timetables.
- Allocate teaching resources.
- Confirm lesson arrangements.
- Manage lesson availability.
- Coordinate online or face-to-face training.

Delivering Educational Services

Throughout your learning programme, your information may be used to:

- Deliver English lessons.
- Monitor progress.
- Record attendance.
- Produce lesson materials.
- Prepare evaluations.
- Issue certificates.
- Communicate important updates.
- Improve the quality of our teaching.

Company Training

Where training is provided to businesses or organisations, personal information may also be used to:

- Administer company training programmes.
- Coordinate with authorised company representatives.
- Organise learner groups.
- Produce Communication Audit reports where requested.
- Recommend training pathways.
- Deliver agreed educational services.

CW English processes company learner information only for purposes directly connected with the agreed training programme.

Administration and Business Operations

Personal information may also be processed to:

- Prepare invoices.
- Record payments.
- Maintain accounting records.
- Meet tax and legal obligations.
- Respond to customer enquiries.
- Resolve disputes where necessary.
- Maintain internal administrative records.

Improving Our Services

CW English continually reviews its educational programmes and administrative processes.

Information may be used to:

- Improve learner experience.
- Improve course design.
- Improve website functionality.
- Develop new educational services.
- Review administrative procedures.
- Improve communication with learners and organisations.

Where possible, statistical or anonymised information may be used for service improvement without identifying individual learners.

Marketing Communications

CW English will only send marketing communications where permitted by applicable law or where you have requested information about our services.

You may unsubscribe from marketing communications at any time by following the instructions contained within the communication or by contacting **info@cwenglish.com**.

Operational communications relating to your learning programme, invoices, assessments or scheduled lessons are considered part of the educational service and are not marketing communications.

What We Do Not Do

CW English is committed to responsible handling of personal information.

We do **not**:

- Sell personal information to third parties.
- Rent personal information to other organisations.
- Share learner information for unrelated marketing purposes.
- Make fully automated decisions that produce legal or similarly significant effects without appropriate human involvement.
- Collect personal information that is not reasonably necessary to provide our educational services.

We believe that learners should always understand why their information is collected and how it supports their educational journey.

Legal Basis for Processing Personal Information

CW English processes personal information only where there is a lawful basis for doing so under the **General Data Protection Regulation (GDPR)** and applicable Spanish data protection legislation.

Depending on your relationship with CW English, one or more of the following lawful bases may apply.

Consent

In some situations, CW English processes personal information because you have given your consent.

Examples include:

- Submitting an enquiry through our website.
- Completing optional forms.
- Agreeing to receive marketing communications.
- Providing additional information voluntarily.

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Performance of a Contract

Most personal information processed by CW English is necessary to provide the educational services you have requested.

This includes processing information required to:

- Register learners.
- Organise lessons.
- Create personalised learning programmes.
- Deliver English training.
- Arrange schedules.
- Produce certificates and evaluations.
- Communicate about your learning programme.
- Administer payments and invoices.

Without this information, CW English may be unable to provide the requested services.

Legal Obligations

CW English is required to retain and process certain information to comply with legal obligations.

These obligations may include:

- Accounting requirements.
- Tax legislation.
- Consumer protection legislation.
- Business record keeping.
- Requests from competent public authorities where required by law.

Legitimate Interests

CW English may process personal information where it is necessary for our legitimate business interests, provided those interests do not override your rights and freedoms.

Examples include:

- Improving our educational services.
- Maintaining learner records.
- Protecting the security of our website.
- Preventing fraud or misuse of our services.
- Maintaining internal administrative records.
- Responding to complaints or disputes.
- Improving the effectiveness of our website and learning processes.

Whenever legitimate interests are relied upon, CW English considers the potential impact on learners and seeks to ensure that processing remains fair, reasonable and proportionate.

Automated Decision-Making

CW English believes that educational decisions should involve professional human judgement.

At the time of publication, CW English does **not** make decisions based solely on automated processing that produce legal or similarly significant effects for learners.

English Level Assessments, Personal Learning Profiles and other educational information are used to support decisions made by teachers and administrators rather than replacing professional judgement.

Any recommendations generated through internal systems are reviewed by CW English before they influence educational planning.

Professor Santi

CW English is currently developing **Professor Santi**, an adaptive educational system designed to support personalised English learning.

At the time of publication:

- Professor Santi does **not** independently collect personal information from learners.
- Professor Santi does **not** make automated educational decisions.
- Professor Santi does **not** replace teacher judgement.
- Professor Santi is **not** responsible for determining learner progression, assessment outcomes or curriculum decisions.

If Professor Santi becomes integrated into the learner experience in the future, this Privacy Policy will be updated before those changes take effect, and learners will be informed where required by applicable law.

Data Minimisation

CW English follows the principle of **data minimisation**.

This means we collect only the personal information that is reasonably necessary to:

- Provide educational services.
- Administer learner programmes.
- Meet our legal obligations.
- Improve the quality of our services.

We do not intentionally collect unnecessary personal information.

Where information is no longer required, it will be securely deleted or anonymised in accordance with our retention policies.

Accuracy of Information

CW English aims to keep personal information accurate and up to date.

Learners are encouraged to notify us promptly if their contact details or other relevant information changes during their learning programme.

Maintaining accurate information helps us deliver our services effectively and communicate important updates relating to lessons, assessments and administration.

Systems Used to Process Personal Information

CW English uses carefully selected systems to administer enquiries, learner registration, assessments, scheduling and educational services.

These systems are used only where necessary to deliver our services efficiently, securely and professionally.

WordPress Website

The CW English website is built using WordPress.

The website is used to:

- Provide information about CW English services.
- Accept enquiries.
- Register learners.
- Manage secure user accounts.
- Provide access to learner resources where applicable.
- Support communication between learners and CW English.

The website does not intentionally collect personal information beyond that required to operate our services.

Elementor Forms

CW English uses Elementor forms to collect information submitted through our website.

These forms may include:

- General enquiries
- Company enquiries
- Contact requests
- Registration forms
- Other service-related forms

Information submitted through these forms is used solely for the purposes described within this Privacy Policy.

Google Workspace

CW English uses Google Workspace to support the administration of its educational services.

This may include:

- Gmail
- Google Forms
- Google Sheets
- Google Drive
- Google Calendar

These services are used to organise learner information, administer educational programmes and communicate with learners and organisations.

Google Forms

Google Forms may be used to collect information including:

- Learning Profiles
- English Level Assessments
- Lesson scheduling preferences
- Feedback forms
- Company information
- Employee information

Forms are designed to collect only information necessary for the relevant educational or administrative purpose.

Google Sheets

Google Sheets may be used to organise and administer learner information.

Depending on the service provided, this may include:

- Learner registration records
- Assessment results
- Scheduling information
- Training administration
- Company training information
- Progress tracking
- Internal educational planning

Google Sheets are used as secure administrative tools and are not publicly accessible.

Email Communication

CW English uses email to communicate with learners and organisations regarding:

- Enquiries
- Lesson scheduling
- Registration
- Assessments
- Programme proposals
- Learning Agreements
- Certificates
- Evaluations
- Invoices
- Administrative matters

Learners are encouraged not to send unnecessary sensitive personal information by email.

Online Meetings

Where online lessons or consultations are provided, CW English may use approved online meeting platforms.

These services are used solely for delivering educational services and communicating with learners.

Internal Administrative Systems

CW English maintains internal administrative records to support the delivery of educational services.

These records may include:

- Learner administration
- Company administration
- Lesson planning
- Curriculum development
- Attendance records
- Educational progress
- Payment administration

- Certificates
- Evaluations

Access to these records is restricted to authorised personnel where required to perform their duties.

Communication Audit Services

Where organisations request a **Communication Audit**, CW English may process additional information necessary to evaluate English communication needs within the organisation.

Depending on the agreed service, this may include:

- Company information
- Department information
- Employee registration information
- Learning Profiles
- English Level Assessment results
- Communication requirements
- Group recommendations
- Training recommendations
- Audit reports

Communication Audit information is processed solely for the purpose of delivering the agreed consultancy and educational services.

Company Training

Where training is provided to an organisation, CW English may receive learner information from an authorised company representative.

Where appropriate, the company is responsible for ensuring that employees have been informed about the processing of their personal information and that any necessary permissions have been obtained before information is provided to CW English.

CW English processes this information only for purposes directly connected with delivering the agreed training programme.

Future Educational Systems

CW English continually develops its educational systems to improve the learner experience.

Future developments may include enhanced educational tools, learner dashboards and adaptive learning technologies.

Where any future system changes materially affect how personal information is processed, this Privacy Policy will be updated before those changes take effect, and learners will be informed where required by applicable law.

Sharing Personal Information

CW English respects the confidentiality of your personal information.

We do **not** sell, rent, trade or otherwise distribute your personal information to third parties for commercial or marketing purposes.

Personal information will only be shared where it is necessary to provide our services, comply with legal obligations or protect the legitimate interests of CW English and its learners.

Service Providers

CW English works with carefully selected service providers who help us operate our educational services.

These providers may include organisations responsible for:

- Website hosting
- Email services
- Cloud storage
- Online forms
- Educational administration
- Payment processing (where applicable)
- IT support
- Website security

These organisations process personal information only as necessary to provide their services and are expected to maintain appropriate standards of confidentiality and security.

Company Training

Where training is provided to an organisation, authorised company representatives may receive limited information relating to the administration of the agreed training programme.

This may include information such as:

- Attendance
- Completion status
- Group allocation
- Assessment summaries (where agreed)

- Progress reports
- Communication Audit reports

CW English does **not** disclose unnecessary personal information to employers or organisations.

Where appropriate, the scope of information shared will be agreed as part of the training arrangement.

Legal Requirements

CW English may disclose personal information where required to do so by law or where disclosure is necessary to:

- Comply with legal obligations.
- Respond to lawful requests from public authorities.
- Protect the rights, property or safety of CW English, our learners or others.
- Investigate suspected fraud or misuse of our services.

International Data Transfers

Some of the service providers used by CW English operate internationally.

As a result, personal information may occasionally be processed or stored outside the European Economic Area (EEA).

Where international transfers occur, CW English seeks to ensure that appropriate safeguards are in place in accordance with applicable data protection legislation.

These safeguards may include:

- European Commission Adequacy Decisions.
- Standard Contractual Clauses (SCCs).
- Other recognised legal mechanisms for international data transfers.

CW English works only with reputable providers that maintain appropriate security and privacy standards.

Data Security

Protecting personal information is an important part of our responsibility to learners and organisations.

CW English implements reasonable technical and organisational measures designed to protect personal information against:

- Unauthorised access.
- Accidental disclosure.

- Loss.
- Destruction.
- Misuse.
- Alteration.

Examples of these measures may include:

- Secure website hosting.
- Password-protected systems.
- Access controls.
- Secure cloud services.
- Software updates.
- Website security monitoring.
- Restricted administrative access.

Although every reasonable effort is made to protect personal information, no internet-based system can guarantee absolute security.

Learners should also take reasonable steps to protect their own account credentials and devices.

Data Retention

CW English retains personal information only for as long as reasonably necessary to fulfil the purposes described in this Privacy Policy.

The length of time information is retained depends upon the nature of the information and the legal or educational purpose for which it was collected.

Personal information may be retained for purposes including:

- Delivering educational services.
- Maintaining learner records.
- Producing certificates and evaluations.
- Supporting future administrative enquiries.
- Meeting legal, accounting and taxation requirements.
- Protecting the legitimate interests of CW English.

When information is no longer required, it will be securely deleted, anonymised or otherwise disposed of in an appropriate manner.

Accuracy of Information

CW English aims to ensure that personal information remains accurate and up to date.

Learners are encouraged to notify us promptly if any relevant information changes, including:

- Name
- Email address
- Telephone number
- Company
- Billing information
- Other contact details

Maintaining accurate information helps ensure that educational services can be delivered effectively and that important communications reach the intended recipient.

Confidentiality

All personal information collected by CW English is treated as confidential.

Access to learner information is restricted to authorised individuals who require access in order to deliver educational services or perform legitimate administrative duties.

CW English takes reasonable steps to ensure that staff, contractors and service providers respect the confidentiality of personal information entrusted to them.

Your Rights

CW English respects your rights under the General Data Protection Regulation (GDPR) and applicable Spanish data protection legislation.

Depending on your circumstances, you may have the right to:

- Request access to the personal information we hold about you.
- Request correction of inaccurate or incomplete information.
- Request deletion of your personal information where appropriate.
- Request restriction of certain types of processing.
- Object to processing based on legitimate interests.
- Request a copy of your personal information in a commonly used electronic format (data portability).
- Withdraw consent where processing is based upon your consent.

These rights are not absolute and may be subject to legal or contractual limitations.

To exercise any of your rights, please contact CW English using the contact details provided at the end of this Privacy Policy. CW English will respond to requests within the time limits required by applicable law.

Withdrawing Consent

Where CW English processes personal information based upon your consent, you may withdraw that consent at any time.

Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

Please note that withdrawing consent may affect our ability to continue providing certain services where that information is necessary to deliver your learning programme.

Complaints

CW English is committed to resolving privacy concerns fairly and promptly.

If you have any questions or concerns regarding the way your personal information has been processed, we encourage you to contact us first so that we have the opportunity to resolve the matter.

If you remain dissatisfied, you have the right to lodge a complaint with the:

Agencia Española de Protección de Datos (AEPD)

Website:

https://www.aepd.es

The AEPD is the independent supervisory authority responsible for enforcing data protection legislation in Spain.

Children's Privacy

CW English primarily provides educational services to adults and professionals.

Where services are provided to learners under the age required by applicable law to provide their own consent, personal information will only be processed with the consent or authorisation of a parent, legal guardian or other authorised representative where required.

CW English does not knowingly collect personal information from children in a manner that is inconsistent with applicable data protection legislation.

Cookies

The CW English website uses cookies to improve functionality, enhance the user experience and support the secure operation of the website.

Further information regarding the cookies used by the website can be found in our separate **Cookie Policy**, which forms part of the legal documentation available on the CW English website.

Where required by law, you will be given the opportunity to manage your cookie preferences when visiting the website.

Third-Party Websites

The CW English website may contain links to third-party websites or services for your convenience.

This Privacy Policy applies only to the CW English website and services.

CW English is not responsible for the privacy practices, security or content of third-party websites.

Users are encouraged to review the privacy policies of any external websites they visit.

Changes to this Privacy Policy

CW English may update this Privacy Policy from time to time to reflect:

- Changes to our services.
- Changes to our administrative systems.
- Changes to applicable legislation.
- Improvements to our educational processes.
- Future developments within CW English.

The most recent version of this Privacy Policy will always be published on the CW English website.

The **Effective Date** and **Document Version** shown on the front page identify the current version of this document.

Where changes are significant, we may take additional steps to notify learners where appropriate.

Contact Us

If you have any questions regarding this Privacy Policy or the way CW English processes personal information, please contact us.

CW English

C. Warwick English S.L.

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28042 Madrid

Spain

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Website: **www.cwenglish.com**

Telephone: **+34 641 141 045**

Closing Statement

CW English believes that effective education is built upon trust, professionalism and respect.

Protecting your personal information is an important part of that commitment. We are committed to processing personal information responsibly, collecting only what is necessary to provide our services, and continually reviewing our practices to ensure they remain appropriate, transparent and compliant with applicable data protection legislation.
Thank you for choosing CW English.