



## INTRODUCTION

### **We are committed to protecting and respecting your privacy.**

When it comes to your personal information, you have certain rights. During the course of our activities we will collect, store and process personal information about you and we know that we have to handle this data correctly in order to be a trustworthy company. Please read the following to understand how we will treat your personal data.

**If you are under 13 years old, you cannot agree to give us your personal data. Instead, please ask a parent or guardian to help you understand our website and policy, and provide us with any details for anything that you are interested in.**

## CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to Company Secretary (Elizabeth Kavanagh) by writing to the address below, or by emailing us at [Data.Protection.Officer@smallpeicetrust.org.uk](mailto:Data.Protection.Officer@smallpeicetrust.org.uk)

For the purpose of UK data protection laws, The Smallpeice Trust of Holly House, 74 Upper Holly Walk, Leamington Spa CV32 4JL is responsible for your data and is called the Data Controller.

## DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six principles of good practice. These say that your personal information must be:

- processed lawfully, fairly and in an understandable manner
- processed for specified, clear and legitimate purposes (meaning that we have to make you aware of why we are processing it)
- adequate, relevant and limited to what is necessary (we won't collect anything that we don't need for the service we are providing)
- accurate and kept up-to-date
- kept for no longer than is necessary, and
- kept safe and that your data is not seen by anyone who doesn't need to see it.

## INFORMATION YOU GIVE TO US



We may collect and use different kinds of personal information about you, including:

- your name, username or something else that identifies you, date of birth, gender, school
- your address, email address and telephone numbers

- IP addresses, your log-in data, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website (such as your computer, phone, tablet, etc.)
- your username, password, your interests, feedback and survey responses, details about your education, interview reports
- information about how you use our website, products and services, and
- your preferences in receiving marketing from us and our third parties, and your communication preferences. (Third parties are other people or groups we may have to share your data with in order to provide you with a service)

### 'SPECIAL CATEGORY' DATA

Special category data is information that is more sensitive and requires more protection. During the course of working with you, we may collect the following 'special category' data about you:

- information about your health, including medical conditions
- photographs of you
- information about your race, ethnicity, religious beliefs, and sexual orientation

We will only use 'special category' information:

- when you have definitely agreed to let us use it
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your clear consent (e.g. medical condition)
- where it is necessary for reasons of public interest (when sharing your data really benefits lots of other people)
- where you have previously made that information public knowledge, or
- if we need to use that data to establish, exercise or defend legal claims

### HOW WE COLLECT YOUR PERSONAL INFORMATION



We may have your personal information by directly interacting with you, such as by:

- you asking a question on our website
- you participating in discussion boards or other social media functions on our website
- you entering a competition, promotion or survey organised by us, or otherwise providing us with feedback
- you subscribing to our services or publications, or otherwise requesting marketing material to be sent to you e.g. signing up for our newsletters
- you communicating with us by phone, email, letters or otherwise
- you applying to one of our Arkwright Engineering Scholarships

- you applying to attend one of our Residential Courses, STEM Days, Aspire Experiences

We may also collect personal information about you from third parties (other companies you may interact with) or publicly-available sources.

### HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Normally, we will use your personal information in the following circumstances:

- you have agreed to let us use it
- we need to perform a contract we are about to enter into, or have entered into, with you (e.g. when you have applied for a course)
- when we need to use it with organisations that work alongside The Smallpeice Trust to help us deliver our courses, for example CyberFirst
- when we or another company have to use it and by using it, we are still in-keeping with your rights, or
- when the law or the rules mean that we have to use it.

### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We may use your personal information for a number of different reasons. For each reason, we have to confirm the 'legal basis' that allows us to use your information, as you can see in this grid:

Purposes for which we will use the information you give to us	Legal basis
To register you as a new student of ours	It will be necessary for the performance of the contract between you and us
To register you as a student with an organisation who works in partnership with The Smallpeice Trust to help deliver our courses, for example CyberFirst	It will be necessary for the performance of the contract between you and us
To notify you about changes to our terms or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions, so that you are up to date on what happens in our business relationship
To allow you to participate in a prize draw, competition or complete a survey	It will be necessary for our legitimate business interests, for example to study how customers use our products, to develop these products and help grow our business

To give you information about courses and events that are similar to those that you have already received from us	If you have received this kind of information from us before, then it will be necessary for our legitimate business interests to make sure that you continue to receive communications that you have previously agreed to receive In all other cases, we will only do this if you give us your consent
To review your application for one of our: <ul style="list-style-type: none"> <li>• Arkwright Engineering Scholarships.</li> <li>• Aspire Experiences</li> <li>• Residential Courses</li> <li>• Stem Days</li> </ul>	We need to be able to review your application for you to take part in one of our programmes.
To respond to your enquiries about one of Arkwright Engineering Scholarships, Aspire Experiences, Residential Courses and STEM Days. Once we get your enquiry, your contact details will be passed on to one of our team members to contact you about your requirements and to fill out a booking form.	We need to be able to respond to you and to make sure that you are aware of the latest programmes available and that we have the correct information on our booking forms.
To provide you with a brochure giving details of one of our courses, which you have asked for through our website.	We need to use this information to be able to send you a brochure.
To provide you with an email newsletter so that you have the latest information about our programmes.	We will only do this if you agree to receive a newsletter by ticking the box on the application form to give your consent.
To get all the information we need from parents and teachers to support an application for one of our Scholarships or for a potential application to take part in one of our courses.	We are using your personal data to support your application.
To administer and improve our website and to keep our site safe and secure.	We are allowed to use this information to make sure you receive the best experience possible when accessing and using our website.
To release Scholar contact information to sponsor to be able to contact their Scholar.	We will need your personal information to complete this.
To set you up with a Slack account so that you can communicate in a safe environment with your mentor.	We will only do this with you and your parent or guardians consent
To keep up in touch with you and follow your education and career path.	Where you have given us your consent
To obtain feedback and survey responses	It will be necessary for our legitimate business interests to ensure that we are providing a good service and make improvements where necessary.
To invite you to events, such as workshops, corporate hospitality, residential course meals and thereafter to manage your attendance at the event in questions to include managing information on your dietary preferences if the event is catered	It will be necessary for our legitimate business interests to develop our relationship with our students and encourage them to nominate guest to attend events. Where you would not normally expect to receive these types of invites from us, we will only send

	<p>you invites if you agree. Where the information collected relates to any dietary preference which may be considered to be 'special category data', for example by indicating a particular religious or philosophical view, or a medical issue or allergy, we will only process this information with your explicit consent</p>
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We will only use your personal information for the reason (s) for which we collected it, unless we really believe that we need to use it for another reason and that reason doesn't go against the original reason for which we collected your personal information. If it's not related, we will let you know and we will explain the legal basis which allows us to do so.

It is important to understand that we may sometimes have to process your personal information without your knowledge or consent where this is needed or allowed by law.

### HOW WE USE THE INFORMATION WE COLLECT ABOUT YOU FROM OTHER SOURCES

We may ask for personal data about you from other people such as your parents or your school. In this case, we will have let you know on the application form when we are going to collect your personal data and add it to the information you have already given us.

We work closely with other third parties including, for example, potential sponsors, potential mentors, other schools and universities. We will also let you know when we receive information about you from them and the reason for which we are going to use that information.

### WHAT IF YOU CANNOT OR WILL NOT PROVIDE US WITH YOUR PERSONAL INFORMATION



When we process your application, for example for one of our courses you must give us certain information: your name, address, email address, and application form, including information about your education. If you do not give us that information, we can't accept your application.

### COOKIE POLICY



Our website uses cookies so that we can tell who is accessing our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- **Session ID.** In order to allow the website to make certain features available, we make use of a session ID cookie. This information is stored temporarily and deleted once the visit has ended.
- **Cookie Banner.** This cookie stores whether a visitor has dismissed the cookie warning message to avoid showing it again on future visits to the website. This stores no personal data.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

<b>__cfduid</b>	To protect our website from security threats such as hackers and to improve its performance our site is routed through CloudFlare.
<b>_ga</b>	Set by Google Analytics and is used to distinguish users.
<b>_gid</b>	Set by Google Analytics and is used to distinguish users.
<b>_gat</b>	Set by Google Analytics and is used to throttle the request rate.
<b>_dc_gtm_</b>	Set by Google Analytics and is used to throttle the request rate.
<b>Lang</b>	This cookie is set due to Twitter integration and sharing capabilities for the social media.
<b>personalization_id</b>	This cookie is set due to Twitter integration and sharing capabilities for the social media.
<b>IDE</b>	This cookie is used for re-targeting, optimisation, reporting and attribution of online adverts.
<b>DSID</b>	This cookie is used for re-targeting, optimisation, reporting and attribution of online adverts.
<b>PHPSESSID</b>	A unique ID number allowing the website to store information about a visitor maintaining data between page loads.
<b>accept_cookies</b>	Stores a value of 1 if the user has dismissed the Cookie Banner.

### Google Maps

The website makes use of a Google Map Embed on the Contact page (and others). This sets a variety of third-party cookies on the google.com domain.

Further information: <https://developers.google.com/maps/terms>

### YouTube

On pages that include a YouTube video, for example the Meet our Scholars, a number of cookies will be stored by YouTube on the device from the youtube.com domain name.

Further information: <https://policies.google.com/privacy/key-terms?hl=en&gl=uk#toc-terms-cookie>.

**You can find more information about the individual cookies we use and the purposes for which we use them by contacting us.**

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Except for essential cookies and cookies that protect our website from security threats, all cookies will expire after a maximum of two years.

### INFORMATION OUR WEBSITE COLLECTS FROM YOU



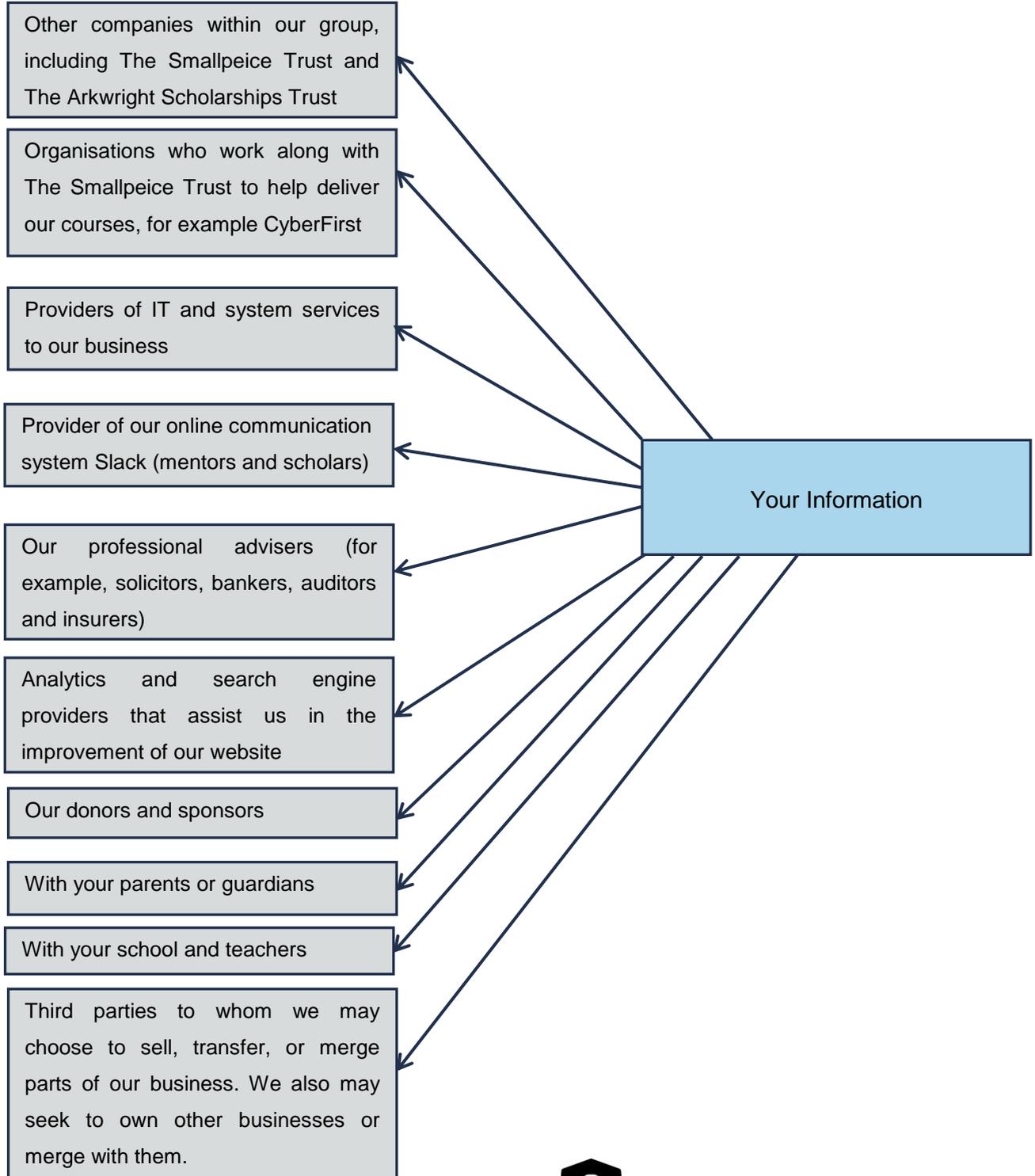
This can include technical information such as:

- the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- if you access the website over a mobile device such as your phone, we may collect information about the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, and time zone setting.
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

**What this means is that we might collect information about what device you use to access our website, where you access it from, when you access it, and what you do whilst you're on our website.**

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with the people and companies set out below:





## WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers in the United Kingdom.

We will take all steps necessary to ensure that your data is treated securely, including the following:

- **Building entry controls.**
- **Lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposing paper.** Paper documents are disposed of by shredding or destruction so that the data is permanently gone.
- **Firewalls.** Protection from unauthorised access into a network or system.
- **Encryption.** Protects from unauthorised access by turning data into a code (password protected).
- **Sending your information to another country.** Whenever we send your personal information outside the United Kingdom, we make sure that it is protected by ensuring that we apply appropriate protection.

Unfortunately, collecting information on the internet means that it is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee that data collected on our website is entirely secure, so it is given at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access and keep it secure.

## HOW LONG WE WILL STORE YOUR INFORMATION

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with the law	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can show the reason why we are using/storing your data is more important than your interests, rights and freedoms, then we will continue to use and

	store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your consent	We will use/store your data until you ask us to stop

To decide how long we keep your personal information, we think about how much information we have, what type of information we have and how sensitive the information is. We also think about the risk of you or others being harmed if your personal information is shared. We will only keep your information for as long as it is required.

## YOUR RIGHTS



In the eyes of the law you have rights about how we collect, keep and process your information, such as:

- You have a **right to access the information** we hold about you free-of-charge, together with why and how we are using your information, who we may have shared that information with, where we got the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete. **If the information is wrong, you can ask us to change it.**
- You have the **right to ask us to delete the information** we hold about you.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a good reason to use the information.
- You have the **right to ask us to send the information** we hold about you to another person or company. We will send that in the way you wish e.g. email / paper form.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information.**
- You have the **right to withdraw your consent** at any time. **You can tell us that you don't want us to use your information any more.**
- You have the **right to object to us using/storing your information for direct marketing purposes.** As us to stop sending you information.

If you wish to use any of your rights, please contact our Company Secretary (Elizabeth Kavanagh) by writing to the address at the top of this policy, or by emailing us at [Data.Protection.Officer@smallpeicetrust.org.uk](mailto:Data.Protection.Officer@smallpeicetrust.org.uk)

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office (ICO) if you believe we are not obeying the rules and you are unhappy with how we are handling your information. The ICO is an independent body set up to help protect personal information.

### TELLING US YOU DON'T WANT TO HEAR FROM US



You can ask us to stop sending you marketing communications and advertisements at any time by contacting our Company Secretary (Elizabeth Kavanagh) by writing to the address at the top of this policy, or by emailing us at [Data.Protection.Officer@smallpeicetrust.org.uk](mailto:Data.Protection.Officer@smallpeicetrust.org.uk)

### AUTOMATED DECISION-MAKING

We do not use automated decision-making processes. This means that people rather than just computers are involved in making our decisions and they are not made at random.

### THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements, so they may collect data in a different way, and for different reasons. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website and, where appropriate, we will send you an email or post on social media. Please check our website frequently to see any updates or changes to our policy.

### **Reference**

See also:

Final Version – Data Governance Policy

## REVISION AND ISSUE STATUS

### External Privacy – Children Policy & Procedure

Issue No	Page No	Date Issued	Changes Made	Amended by
V1.0	Whole Document	25/05/18	New Policy issued	E Kavanagh
V1.1	Page 12	23/08/18	Added reference to Data Governance Policy	N Smith
V1.2	Page 12	23/08/18	Amended typing/ wording errors	N Smith
V1.3	Page 12	31/10/18	Removed reference to Data Governance Policy	N Smith
V1.4	Page 5	11/12/18	Added 2 further categories for legal basis for processing	N Smith
V1.5	Page 1	29/01/19	Removed sentence 'incorporating Arkwright Engineering Scholarships	N Smith
V1.6	Page 4 & 9	06/03/18	Added further information regarding sharing information with partner organisations (CyberFirst)	N Smith
V1.7	Page 6	07/03/19	Update table with information regarding CyberFirst partnership	N Smith
V1.8	Page 4 & 9	29/03/19	Added further information regarding use of Slack as method of communication	N Smith