

Privacy Policy

Introduction

Villiers Park Educational Trust is committed to protecting your personal privacy and taking care with how we collect, use and store your data.

We process personal information in compliance with the Data Protection (2018) Act and other relevant privacy legislation. This policy explains how we will collect, use and store data as part of our work, and ensure we respect your individual rights.

Our Vision

Villiers Park is a national social mobility charity dedicated to supporting young people from under-represented backgrounds through programmes that develop personal, academic and employability skills and empower them to make informed choices about their future.

We believe every young person should have an equal opportunity to excel at school, at university and in their careers.

Villiers Park Educational Trust is a registered charity with the Charity Commission in England and Wales (registered charity number 1179436). Our work is almost entirely funded through voluntary income thanks to the generosity of members of the public, charitable trusts and foundations, companies and universities and individuals.

What this policy is about

This privacy policy explains how Villiers Park Educational Trust (we) processes your personal information ('data'). In this policy, "processes" means collects, stores, shares and otherwise uses for lawful purposes. "We" and "our" means Villiers Park Educational Trust and it covers all the instances where we might process personal information of supporters, beneficiaries and other relevant parties of Villiers Park Educational Trust.

Villiers Park Educational Trust promises to safely process and store your personal data. We strive to ensure that our paperwork and forms are clear about how we will use the data we collect. Data plays a big role in what we do. It is fundamental for the safe and effective running of our courses, programmes and our charity. The section on 'how we use your personal information' will explain how we use data about you. As per the section on 'what we collect', you may withdraw your consent for us to process your information at any time.

We take your privacy seriously and are committed to protecting your personal information. We aim to be clear and open about our data and security practices.

Where we ask you to provide us with any information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement, and in line with the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulation (PECR) 2018.

If you have any questions about this policy or how we use your personal information, please contact us using the contact details contained at the end of this privacy policy.

Organisations are permitted to process data if they have a legal basis in doing so. We process data when:

- We have express and informed consent given by the person whose data is being processed; and/or
- We have a legitimate interest in processing the data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; and/or there is a legal obligation on Villiers Park Educational Trust to process data.

Where Villiers Park Educational Trust is relying solely on consent as the basis for processing data, we are required to obtain your expressed consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which we are able to provide services to or interact with you in future.

Villiers Park Educational Trust may change this policy from time to time and any such changes will be published on our website. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

Your personal information: what we collect

We collect personal information from a number of places, including through (but not limited to):

- * General contact with us
- * Registration or subscription
- * Enquiry about our programmes and other activities
- * Make a donation
- * Attendance at an in-person event
- * Attendance at an on-line event
- Application to work or volunteer with us
- Visit to our website
- or otherwise provide us with your personal information.

We may also receive personal information indirectly from you, for example through specialist companies carrying out work on our behalf, such as surveys or event bookings, partner organisations for our projects or website and social media platforms which you use to engage with us.

The information we collect may include (but isn't limited to):

- **contact information:** including name, postal address, email address, phone number, place of work and job title
- **financial information** (for donors): including bank details, payment details and if you are a taxpayer
- **background information** (in the case of applicants for paid and volunteer roles): including employment history, eligibility checks and training records
- **sensitive personal information:** including age, gender, health, and other diversity information
- your opinions on our services and the routes near you
- how you interact with our website and record which pages you visit when you follow links from our emails through the use of cookies.

We do not use cookies to collect this type of information. All online financial transactions will be encrypted using TLS (Transport Layer Security).

We may also receive information about you when you interact with third parties with whom we work. For example, where you've made a donation to us through a third-party website

(e.g., Just Giving, CAF Donate or Benevity) and given them permission to share your information with us.

We may supplement what we know about you with information that is available to the public. For example, in order to ensure that our communication with you is relevant and tailored to your background and interests, we may collect information about you from publicly available sources either directly or through third-party subscription services or service providers. We may also carry out research using publicly available information to identify individuals who have an affinity to our cause but with whom we are not already in touch.

We may collect aggregated or anonymous information when you visit our website or interact with our content. For example, we may collect information about the services you use and how you use them, like when you watch a video on YouTube, visit our website or view and interact with our ads and content. Please see our Cookie Policy for more detail.

We may also collect and process information about your interactions with us, including details about our contacts with you through email, SMS, post, on the phone or in person (i.e., the date, time, and method of contact), details about donations you make to us, events or activities that you register for or attend and any other support you provide to us. We may also collect and record any other relevant information you share with us about yourself, including your interests or your affiliations with other charities, community groups, your employer or a Villiers Park corporate partner. If you are a minor, we may collect the name and contact details of a parent or guardian and, where appropriate, the name and location of your school.

You, as the data subject, may change your preferences or request deletion of your data at any time in writing, subject to any overriding legal obligation that we may have for its retention. We may keep such data on a 'suppression list' so we know not to contact you or process your data in future until further notice.

You also have the right to raise any issues of concern about us regarding data protection and our processing of your information to the data protection regulator, The Information Commissioner's Office (ICO). Here is a helpful link to their website.

<https://ico.org.uk/concerns/>.

Supporter profiles:

We use profiling and screening techniques to ensure communications are relevant and timely and provide an improved experience for our supporters. Profiling allows us to target our resources effectively and understand the background of people who support us, helping us to make appropriate requests for support and raise funds towards VPET's work.

When building a profile we may analyse geographic, demographic and other information relating to you in order to better understand your interests, preferences and motivation for giving and engage with you in a more personalised way. In doing this, we may use additional information from third party sources or publicly available sources. This could be, for example, addresses, education history, listed job titles or typical earnings in a given area. We may review other information about you that is publicly available through internet searches, social networks such as LinkedIn, subscription services, news archives or public databases (e.g., Companies House, the electoral, political and property registers), information about corporate directorships, shareholdings, published biographic information, philanthropic interests and networks, charitable giving history and relevant media coverage.

When you contact us by email, letter or on the phone, we may also record this information on our customer relationship management database to help us process your request efficiently.

Do we process 'sensitive' personal information?

Under data protection law, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs, and political opinions ('sensitive personal data'). In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or support to enable you to participate in charitable fundraising challenge event.

How we use your personal information

We use your personal information for the following purposes:

- to confirm that your donations and fees have been processed correctly or to validate your Gift Aid claim;
- for providing the relevant information to you regarding the work we do to support young people;
- for invoicing purposes when you donate to us;
- to send you administrative information, relating to our organisation and its activities, for example, information about a residential a young person is attending, where relevant;
- for our internal purposes such as management, research, analytics, organisational reporting, and ways that will improve efficiencies;
- to check with you that you are content with regards the type of communications that you receive;
- To market our events, fundraising opportunities, and other ways to get involved with Villiers Park Educational Trust, including occasionally third-party events or activities that may be of interest to you by the appropriate means and in accordance with the GDPR and the PECR;
- To provide you with services, products or information you have requested;
- To analyse and improve the services, products, information we provide;
- To analyse and improve the content and operation of our website;
- To analyse and improve our internal business processes;
- To analyse the personal information we collect about you, and use publicly available information to better understand your interests, preferences and level of potential donations so that we can contact you in the most appropriate way and to ensure that we do not send you unwanted communications;
- To tailor advertising that is presented to you on the Internet according to your interests, preferences and other characteristics (as described below);
- To direct advertisements and other communications to other people who may have similar interests or other characteristics to yours (as described below);
- To assess your personal information for the purposes of credit risk reduction or fraud prevention; and
- Where we are required by law to disclose or otherwise use your information.

We may contact you for marketing purposes by email or text message if you have agreed to be contacted in this manner. We may also send you service communications via email or text, for example where you place an order for goods or services on our website, or you have donated by text.

If you have provided us with your postal address or telephone number, we may send you information about our work or other communications of the kinds described above by direct mail or contact you by telephone unless you have told us that you would prefer not

to hear from us in this way. We provide information about how you can change your marketing preferences below.

Who we share your personal information with

We do not sell or share personal details to third parties for the purposes of marketing.

If we run an event or fundraising activity, it may require the service of a third party and then we might need to share your details with them. This would happen if your data was required to deliver the specific activity, for example we would share your data with an outsourced mailing house provider, in order for us to send you a fundraising appeal.

If we share your data with colleagues or programme partners, including outside of the European Union, we will only do so if we are confident that they adhere to the same high standards that we do when processing data and protecting its privacy and security.

If we share your information with other organisations or data processors we do not allow them to use your information for their own purposes and they have to follow our strict instructions whilst complying with appropriate security measures. We regularly assess their security measures and we continue to monitor their compliance throughout the time we use their services.

We may also share your data with law enforcement agencies, regulators, courts, public authorities or emergency services when required to do so.

How long we keep your personal information

The period for which we keep your information depends on the purpose for which your information was collected and the use. We will not keep your personal information for longer than necessary for those purposes or for any other legal requirements.

We review all data retention periods every two years. Data collected for accounts purposes are kept for seven years plus an additional period of six months. You can request your data to be forgotten and we will delete all your data other than anything we must retain for legal reasons.

How we protect your personal information

We maintain the highest standards of data privacy and security to protect your personal details and other information about you because we want you to feel completely confident about the communications you receive from us. We regularly review our processes and procedures to protect your information from unauthorised access and use, accidental loss and/or destruction.

Keeping your personal information up to date

We want to make sure that any personal information we hold about you is up to date. So, if you think your personal information is inaccurate, you can ask us to correct or remove it at no charge to you. This is called your right to rectification. Please contact our office on 01223 872601 or dataprotection@villierspark.org.uk if you would like to change any information that we may hold on you.

Under the GDPR, you have a right to know what personal information we hold about you. To request any information, please read the Subject Access Request policy and complete the form provided, all available via the link,

The Data Controller
Villiers Park Educational Trust
Allia Future Business Centre
King's Hedges Road
Cambridge

CB4 2HY

To opt out of receiving information from us and for any enquiries about data collection and management, please contact Villiers Park on:

Tel: 01223 872601

Email: dataprotection@villierspark.org.uk

What other Data Protection rights do you have?

Under UK data protection law, you have certain rights over personal information that we hold about you. These rights are summarised below. Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances.

You can assert your rights, raise a concern, or make a complaint about how we process your personal data by contacting our Data Controller. It will assist us, if you explain your request or concern and describe the personal information you are referencing as specifically as possible. To action your request, we may need to request further information or request that you provide proof of identity.

Your rights in relation to our processing of your personal information, include:

- Right to object to the processing of your data - you have the right to object to our processing of your personal data in certain circumstances. If you object, please explain your objection and the reason for it. If you are objecting to the processing of your data for direct marketing purposes, you can contact us and we will stop processing your data for those purposes as soon as reasonably possible.
- Right to have inaccurate or incomplete personal information corrected or completed - if you believe our records of your personal information are inaccurate or incomplete, you have the right to ask us to correct or complete those records. You can do this by contacting us via email, by phone or in writing
- Right to restrict processing – in certain circumstances, you have the right to ask us to stop making active use of the personal information that we retain in our records about you, if there is disagreement about its accuracy or legitimate usage.
- Right of erasure - in certain circumstances, you have the right to request that we delete your personal information from our records.
- Right of access - you can write to us to ask for confirmation of what information we hold relating to you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exceptions that apply.
- Right to receive your personal information in a portable format – in limited circumstances, where we are processing information you provided to us because you gave us your consent or because it is necessary for the performance of a contract and the processing is carried out by automated means, you may ask us to provide it to you in a portable format.

If you are not happy with how we have handled your request or complaint, you can contact the Office of the Information Commissioner, which oversees the protection of personal data in the UK. Alternatively, you may choose to contact the Information Commissioner directly about your complaint, regardless of whether you have raised it with us first.

Why we are allowed to process your personal information

Our Privacy and Cookie Policies consider several laws, including:

- the Data Protection Act 2018
- the Privacy and Electronic Communications (EC Directive) Regulations 2003
- General Data Protection Regulation (EU) 2016/679

Generally, our processing of your personal information as described in this policy is allowed by these laws based on one or more lawful grounds, including:

- Where you have provided your consent to us using your personal information in a certain way. For example, we only use your information to send you marketing communications by email or text with your consent. We also may ask for your explicit consent if you share sensitive personal information with us.
- Where the processing is reasonably necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract. For example, we may rely on this basis where you apply to work for us.
- Where the processing is reasonably necessary to comply with a legal obligation to which we are subject. For example, we may rely on this basis where we are obliged to share your personal information with a regulator or HMRC.
- Where the processing is reasonably necessary for the purpose of a legitimate interest pursued by us or a third party and your privacy rights do not override the legitimate interest. Our "legitimate interests" include pursuing the aims and ideals of Villiers Park Educational Trust through empowering young people to succeed and have confident futures by discovering the skills and knowledge they need to become the leaders of tomorrow; and through our fundraising via trusts & foundations, corporate partners, major donors and direct marketing campaigns, emergency appeals and events. However, "legitimate interests" can also include your interests, such as when you have requested information from us, and those of third parties, such as our beneficiaries.

For example, we rely on legitimate interests for activities such as sending marketing communications by post or telephone unless you have told us that you would prefer not to hear from us in this way, contacting you as a representative of an organisation about charity partnerships or to organise an event, and analysing your interaction with us to improve our internal business processes.

In any event, where we are relying on legitimate interests to process your personal information, we will consider any potential impact on you (positive or negative), your rights under data protection laws, and will not use your personal information for activities where the impact on you overrides the legitimate interests in the processing.

Where we process sensitive personal data (as mentioned above), we will make sure that we only do so in accordance with one of the additional lawful grounds for processing that type of data, such as where we have your explicit consent, or you have made that information manifestly public.

Job and Volunteer Applicants and Current and Former Employees

This Privacy Policy does not apply to personal information that we collect from you if you apply for a job or volunteering opportunity with Villiers Park Educational Trust or become an employee or volunteer. You will receive a separate Privacy Statement from us when providing information for these purposes.

Other Websites

We cannot be held responsible for the privacy of data collected by websites not owned or managed by Villiers Park Educational Trust, including those linked through our website.

Emails – Terms of Use

Emails are not always secure and can be intercepted or changed after they have been sent. Villiers Park Educational Trust does not accept liability if this happens. The contents of emails reflect their author's views and not necessarily those of Villiers Park Educational Trust.

Please do not send Villiers Park Educational Trust any financial data through email.

The information in emails is confidential, so if you've received one by mistake, please delete it without copying, using or telling anyone about the contents.

Cookie Policy

What are Cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device and to target the content displayed to the user's interests.

You can find more information about cookies at <https://www.allaboutcookies.org> and <https://www.youronlinechoices.com/uk/>

Do we use Cookies?

Yes.

Types of Cookies

There are two broad types of cookies - 'first party cookies' and 'third party cookies':

First party cookies are cookies that are served directly by the website operator to your computer and are often used to recognise your computer when it revisits that site and to remember your preferences as you browse the site. Basically, these are our cookies.

Third party cookies are served by a service provider on behalf of the website operator and can be used by the service provider to recognise your computer when you visit other web sites. Third party cookies are most used for web site analytics or advertising purposes.

In addition, cookies may be either 'session cookies' or 'persistent cookies'. Your computer automatically

Why we use Cookies

We use cookies and similar technologies to collect and store information (which may include your personal information) about how you interact with our website. We may use these technologies to help us deliver relevant information about our organisation.

By using our website, our social media pages (such as Facebook, Twitter, YouTube and Instagram), subscribing to our services, donating to us and/or shopping online, you agree that, unless you have set your computer's browser to reject them, we can place the types of cookies on your device and use that data in accordance with this policy.

Our website may contain links to other websites of interest. Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

The Cookies we use

Google Analytics

- `_ga`, Used to distinguish users.
- `_gid`, Used to distinguish users.
- `_gat`, Used to throttle request rate.

Website Statistics, Analytics, Testing and Personalisation

We currently use Google Analytics:

[Google Analytics](#) is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which (as discussed above) are text files placed on your computer, to help the website analyse how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more details, please read [Google's Analytics overview](#).

You can always opt-out of Google Analytics cookies by [Google's opt-out tool](#).

Other Third Party Cookies

You may notice some other cookies that are not related to the Villiers Park's website whilst visiting www.villierspark.org.uk. Some of our pages contain embedded content such as YouTube video, Twitter feed and Facebook likes, and you may receive cookies delivered from these websites. Villiers Park does not govern the publication of third-party cookies. To understand more about their cookies and privacy statements, please visit the relevant sites.

Some of our cookies will remind you about our work and how you can help after you have left the website. These are the targeting/advertising cookies we use. It is a useful tool for us to keep public awareness of our campaigns and how they can be supported.

If you do not want cookies to be stored on your PC it is possible to disable this function without affecting your navigation around the site.

Changing Your Cookie Preferences

The "Help" menu in the toolbar of most web browsers will tell you how to change your browser's cookie settings, including how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. Below is some helpful guidance about how to make these changes.

How to Disable Cookies

If you are using Microsoft Internet Explorer and you wish to block Villiers Park website cookies, you can perform the following:

1. On your browser tools menu, select 'Internet Options'
2. Click on the 'Privacy' tab and then on the 'Sites' button
3. Type into the 'Address of website' field: www.villierspark.org.uk
5. Click on the 'Block' button
6. Click on the OK button

Find out more information about blocking or deleting cookies using Microsoft Internet Explorer.

7. Other browsers:

- Firefox cookie management
- Chrome cookie management
- Safari cookie management

Contact Information

Should you have any questions or concerns about this Privacy Policy or the way that Villiers Park Educational Trust handles data please contact us by any of the following means:

The Data Controller
Villiers Park Education Trust
Allia Future Business Centre
King's Hedges Road
Cambridge
CB4 2HY

Tel: 01223 872601

Email: dataprotection@villierspark.org.uk