



The EBP Privacy Notice August 2019

The EU General Data Protection Regulation (GDPR), which is enforceable from 25 May 2018 provides new rights to individuals and requires organisations to provide information about their processing in a clear and transparent way.

The EBP is committed to protecting your privacy and we take our responsibilities about keeping your data secure very seriously. We work in compliance of the Data Protection Act 1998, the EU General Data Protection Regulation (GDPR) and other relevant legislation.

This privacy notice explains how and why we collect personal data about you and what we use that data for, who we disclose it to and how we protect your privacy.

When we refer to “we”, “us” or “our” in this notice we mean The EBP.

Who we are and important information

Our privacy notice applies to personal data that The EBP collects, uses and processes at our registered offices: The EBP, Welton House, Limekiln Way, Lincoln, LN2 4WH and our regional offices in Leicestershire and Northamptonshire.

The EBP is the trading name of The Lincolnshire and Rutland Education Business Partnership. We are a social enterprise developing the skills of young people, registered in England with company no: 4190289.

We are registered with the Information Commissioner’s Office (ICO) Data Protection Register; registration number Z5536487 expires 12 August 2020.

What types of personal data do we collect?

When referring to “personal data” we mean any information that allows us to identify you. It does not include any data where the identifiable information has been removed (anonymous data).

We may collect, store, use or in some cases transfer different categories of personal data about you, which can be grouped as follows:

EBP

- a. Identity details includes first name(s) and last name (sometimes referred to as surname).
- b. Contact details means data we use to contact you, and can include address, telephone number(s), email address, business or organisation name.
- c. Financial data means the data we hold to process payments for goods, services or programmes that you have provided to us or purchased from us.
- d. Transaction data means details about your transaction history with us, including payments to and from you along with other details of services or programmes you have purchased from or supplied us with.
- e. Special category data means personal data that relates to particularly sensitive information and may include such information as:
 - Medical information.
 - Information relating to race, ethnic origin, gender identity, sexual orientation, religious or political beliefs.
 - Biometric data such as voice or video recordings and facial images.
- f. Technical data means details about the device(s) you have used to access our website and to interact with our emails or text messages with. This may include browser type, location, operating system, device make.
- g. Usage data includes information about how you use our website, products and services. This would include details about your browsing patterns (only within our own website), such as how long you've spent on each page, what pages you've visited and in what order and you're landing and exiting pages.
- h. Marketing and communications data including your preferences for receiving marketing information from us.

We also collect use and share anonymised data for statistical and demographic purposes. This data is not stored in a way that allows it to be used to identify an individual directly or indirectly.

How do we collect personal data?

We collect personal data about you from using a number of different methods including:

- Automated interactions as you interact with our website, social media accounts or other forms of digital media. We may automatically collect usage and technical data. This data is collected using cookies, server logs and other similar technologies.

EBP

- Direct interactions. You may provide your personal data to us when completing online forms, corresponding with us by post, email, over the phone or otherwise, or by interacting with us at events.
- Indirect interactions. You may also provide information to us indirectly by accessing one of our programmes or services through a third party, or if we collect your personal information from a publicly accessible source (such as a company website) as part of our normal business activity.

How we use your personal data

We only use personal data when we have a legal basis for doing so. In most cases we only process personal data for the following purposes:

- To fulfil a requirement under a contract we are about to enter or have entered into.
- In order to comply with a legal obligation.
- When the processing is necessary for our legitimate interests, and those interests are not overridden by your interests and fundamental rights.

Purpose and lawful basis for processing your personal data

In the below table, we have described all the ways that we commonly use personal data, along with the legal basis we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing
To communicate with you, and manage our relationship.	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you. We may also use some data for our legitimate interest of ensuring our customer service quality standards are met.
To manage your queries submitted to us through the post, by email, over the phone, by social media or any other means.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special category	For our legitimate interest of ensuring our customer service quality standards.

Purpose/Activity	Type of data	Lawful basis for processing
To collect and recover money owed to us.	(f) Identity (g) Contact (h) Financial (i) Transaction	For our legitimate interest to recover debts due to us.
To carry out fraud assessments.	(a) Identity (b) Contact (c) Financial (d) Transaction (f) Technical	For our legitimate interests of ensuring payments are not fraudulent.
To help us improve our offering to our customers, including asking you to leave a review, take a survey or provide customer insight.	(a) Identity (b) Contact (d) Transaction (h) Marketing and communications	For our legitimate interests of monitoring how our customers use our products/services, improving our offering to our customers and to develop and grow our business.
To enable you to partake in a competition or promotion.	(a) Identity (b) Contact (g) Usage (h) Marketing and communications	For the performance of a contract with you to fulfil the competition or promotion.
To deliver a programme, service or event that you are involved with.	(a) Identity (b) Contact (e) Special category	Performance of a contract with you. We also use some data for our legitimate interest of developing the skills of young people.
To inform you about our news and offers that we believe you may be interested in.	(a) Identity (b) Contact (d) Transaction (g) Usage (h) Marketing and communications	For our legitimate interests, to grow our business and to inform our marketing strategy.
To use data analytics to improve our website, products/services or programmes, marketing, customer relationships and experiences.	(f) Technical (g) Usage	For our legitimate interests, to keep our website updated and relevant, and to inform our marketing strategy and develop our business.

EBP

Purpose/Activity	Type of data	Lawful basis for processing
To comply with a legal obligation.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special category (f) Technical (g) Usage (h) Marketing and communications	To meet an identified common law or statutory obligation.

The EBP does not conduct any automated decision making, although we may from time to time, profile our customers for the purposes of targeting marketing at them. When we profile our customers, this is done in the interest of ensuring that our marketing is relevant to its audience. For example, we may classify an appropriate audience for a promotion based the proximity of their location to a programme we offer.

Marketing

We strive to provide you with choices regarding certain uses of personal data, particularly around marketing. We only send electronic marketing when it is in our specific legitimate interest to do so and we will always offer a way out of receiving future marketing in every marketing communication we send, often in the form of a link to unsubscribe at the bottom of an email.

You can also choose to let us know you don't want to receive future marketing communications at any time by emailing enquiries@the-ebp.co.uk.

Where you have opted out of receiving marketing messages from us, it will not apply to personal data used by us for another purpose, such as corresponding to you about a programme you are taking part with. We will continue to process such personal data in accordance with this privacy notice and as permitted by law.



Security of your personal data

The EBP is committed to taking appropriate organisational and technical measures to protect your personal data from being accidentally lost, accessed or used in an unauthorised manner, disclosed or changed.

Our systems are set up in a way to limit access to personal data so that only our employees and agents that have a business need are able to access your personal data.

As described in this privacy notice we may in some cases, share your personal data with our partner organisations (third parties). When we share your personal data with our partner organisations we only do so when require that they have appropriate technical and organisational measures in place to protect your personal data before we share it with them.

There may however be times when we are compelled to share disclose your personal data by law to third parties (such as the police) where we have limited control over how it is protected by those parties.

In the event that we identify any suspected breach of personal data then we have procedures in place to deal with these and will notify the applicable regulator (usually the ICO) and you in accordance with the appropriate data protection legislation.

Cookies

In order to improve our website and services, to provide you with more relevant content and improve our customer journey, we may use technologies such as cookies and analytics tools.

In most cases we are not able to identify you directly from information we collect using these technologies as we do not utilise those features of the technology.

Sharing your personal data

We may share some of your personal data with, or be given your personal data by our partner organisations as detailed below:

EBP

- Financial service providers: We may share personal data required to allow the processing of card or bank details to complete payments for service and programmes that you are involved with, or to fulfil the payment of an invoice you have sent us. We do not keep such information any longer than required under financial regulations for the purposes of auditing and fraud prevention.
- Authorities: We will disclose your information with authorities when we in good faith believe we are required to by law or when we in our discretion believe the sharing of personal data is required to protect the legal rights of another.
- Suppliers providing services to us in order to help us run our business: we may provide some of your personal data to a third party when they provide us with a service that we use as part of our business activity. Examples of such services would include but is not limited to, bulk text messaging services, venues, such as conference centres and partners and sub-contractors.
- Professional advisors: We may also share your data with professional advisors, such as lawyers and insurers to manage risks and legal claims.

When working with partner organisations they do not use or have access to your personal information for any purpose other than those clearly laid out by prior agreement between ourselves and the partner organisation. Where such prior agreements are in place they only provide for your personal data to be used for the purposes described in this privacy notice.

NCS

The EBP is both a regional and local provider for the NCS programme. The NCS Trust CIC (NCS) is the data controller for all NCS data, as a regional and local provider for NCS The EBP is a data processor of the personal data.

As such for the purposes of your personal data in relation to NCS you should review the appropriate privacy policy at <http://www.ncsyet.co.uk/privacy-policy>.

Your rights

Under UK data protection laws there are under certain circumstance rights that you have in relation to your personal data.

EBP

You have the right to:

- Request that any incorrect personal data we hold about you is corrected. Although in some circumstances we may need to verify the accuracy of the new data provided to us.
- Request erasure of your personal data. You can ask us to delete or remove your personal data where there is no good reason for us to continue processing it, for example where you consider that we do not need it any longer for the purposes for which we originally collected it.
You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below). Please note however, that we may not always be able to comply with your request for erasure for a specific legal reason. If this is the case we will notify, if applicable, at the time of the request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you feel there is something about your particular situation which makes you want to object to the processing on this ground as you feel that the processing impacts on your fundamental rights and freedoms.
You also have the right to object to processing of your personal data for direct marketing purposes.
In some cases we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights or freedoms.
- Request restriction of processing of your personal data. You can ask us to suspend the processing of your personal data for the following reasons:
 - You want to establish your data's accuracy.
 - Where our use of your personal data is unlawful but you don't want us to erase it.
 - Where you need us to continue to hold your personal data even though we no longer require it as you need it to establish, exercise or defend a legal claim.
 - You have objected to our use of your personal data but we need to verify whether we have an overriding legitimate ground for its use.
- Request the transfer of your personal data to you or a third party. We will provide you (or the third party directly if you request) your personal data in a structured, commonly used, machine readable format. Please note this right only applies where we used the information to perform a contract with you, or the information was automated information which we relied on your consent as our legal basis to process.
- Request access to your personal data (a "data subject access request" SAR). This allows you to receive a copy of the data we hold about you.

EBP

You do not need to pay a fee to access your personal data. However, we can charge a reasonable fee or refuse to comply with your request, if it is repetitive, excessive or clearly unfounded.

In the event that you make a subject access request we may need to request additional information from you as a security measure to confirm your identity and ensure your right to access your personal information. In some situations, we may also contact you to request further information to allow us to better deal with your request.

Once we receive a subject access request we will try to respond within one month. Sometimes it may take us longer if your request is complex or you have made a number of requests, in this case we will inform you of the reason for the delay and when we will be able to answer your request without undue delay but no later than within one month.

Data Retention

We will only retain your personal data as long as necessary in order to fulfil the purposes for which we collected it, including the purposes of satisfying a legal, accounting and reporting requirements.

To determine the retention period for personal data, we consider the sensitivity and amount of personal data, the potential risk of harm from unauthorised use or access, the purposes for which we process the personal data and any applicable legal requirements.

In most cases once we no longer need your personal data we will anonymise the data (so that it can no longer be associated with you). The anonymised data will then be kept for statistical purposes indefinitely without further notice to you.

Updates to our privacy policy

We review our privacy notice regularly to take into account changes to our processing and regulatory changes. This means we may make changes to our privacy notice from time to time and will publish any new version on our website.



Contact information

If you have any questions or comments about our privacy policy then we would welcome your contact.

If you want to exercise any of your data protection rights you should also contact us using the below details.

Should you wish to contact us you can do so:

- By email: dataprotection@the-ebp.co.uk.
- By phone: 01522 574100
- By post:
Data Protection
The EBP
Welton House
Limekiln Way
Lincoln
LN2 4WH

Third party links

Our website includes links to third party websites, plug-ins and applications. Clicking those links will take you to the third parties website and may allow them to collect your personal data.

We do not control those third parties and as such are not responsible for their privacy notices. When using third party website we recommend that you read their privacy notices so that you understand what personal data they will be collecting.

Further information

Should you want more information about your data protection rights, you can find information here:

<https://ico.org.uk/for-the-public/>