

Privacy Policy

Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.
- 1.3 This privacy policy was last updated on 11 May 2018

Credit

- 2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

Collecting personal information

- 3.1 We may collect, store and use the following kinds of personal information:
 - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
 - (b) information that you provide to us when registering with our website (including your email address);
 - (c) information that you provide when joining as a member via our website (including your title, name, address, profile pictures, gender, date of birth, twitter handle, and employment details);
 - (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
 - (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
 - (f) information relating to any purchases you make of our goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details);
 - (g) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts and any peer to peer fundraising pages);

- (h) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication and any information gathered on a form); and
- (i) any other personal information that you choose to send to us.
- (j) information relating to any donations you make including your name, address, telephone number, email address, which appeal you are supporting and in the case of direct debits the frequency and date of when direct debits will be taken;

Note – Card details and bank details are collected by the website, but only stored by our payment processors, and not by us.

3.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

Using personal information

4.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

4.2 On the basis of legitimate interest to run our charity, we may use your personal information to apply to A, B, C, D, E, F, M, N, O and P below

Where you have given us consent we may use your personal information to complete G, H, I, J, K, and L below

In order to complete the service you have requested we may use your personal information to complete D, E, and F below

- (a) administer our website and business;
- (b) personalise our website for you;
- (c) enable your use of the services available on our website;
- (d) send you goods purchased through our website;
- (e) supply to you services purchased through our website;
- (f) send statements, invoices and payment reminders to you, and collect payments from you;
- (g) send you non-marketing commercial communications;
- (h) send you email notifications that you have specifically requested;

- (i) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- (j) send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer wish to receive marketing communications);
- (k) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- (l) deal with enquiries and complaints made by or about you relating to our website;
- (m) keep our website secure and prevent fraud;
- (n) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service);
and
- (o) to conduct aggregate analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our charity;
- (p) Your data may also be available to our website provider to enable us and them to carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

Your data will be made available to our website provider

The data that may be available to them include any of the data we collect as described in section 3 above.

Our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA.

They will store your data for a maximum of 7 years.

This processing does not affect your rights under sections 10 or 16 of this privacy policy

4.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

4.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website. Any comments/donations etc can be removed on request.

4.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

4.6 All our website financial transactions are handled through our payment services provider, *Stripe*, *GoCardless* or *Paypal*. You can review the provider's privacy policies via the following URLs <https://stripe.com/gb/privacy>, <https://gocardless.com/legal/privacy/> and <https://www.paypal.com/ie/webapps/mpp/ua/privacy-full>. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

4.7 Transferring information outside the EU

The College stores data on systems called *Salesforce* and *Google*. Both of these systems store data in the USA and therefore we will transfer the personal information we collect about you to the USA for processing and storage. There is an adequacy decision by the European Commission in respect of the USA. This means that the country to which we transfer your data is deemed to provide an adequate level of protection for your personal information.

Disclosing personal information

5.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers (including specifically the provider and host of our website or other subcontractors) insofar as reasonably necessary for the purposes set out in this policy.

5.2 We may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

5.3 Except as provided in this policy, we will not provide your personal information to third parties.

International data transfers

6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.

6.2 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

6.3 You expressly agree to the transfers of personal information described in this Section 6.

Retaining personal information

7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

7.3 Without prejudice to Section 7.2, we will usually delete all inactivatedata after 10 years.

7.4 Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

Security of personal information

8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

8.2 We will store all the personal information you provide on our, and where applicable our supplier's, secure (password- and firewall-protected) servers. This may include data storage services provided in the Cloud.

8.3 All electronic financial transactions entered into through our website will be protected by encryption technology.

8.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

Amendments

9.1 We may update this policy from time to time by publishing a new version on our website.

9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

9.3 We may notify you of changes to this policy by email or via a message on our website.

Your rights

10.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

(a) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

10.2 We may withhold personal information that you request to the extent permitted by law.

10.3 You may instruct us at any time not to process your personal information for marketing purposes.

10.4 In practice, you will usually expressly agree in advance to our use of your personal information for marketing purposes.

Third party websites

11.1 Our website includes hyperlinks to, and details of, third party websites.

11.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties. This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data

11.3 We operate a number of social media pages (including Facebook, Twitter, You Tube and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

Updating information

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

Cookies

13.1 Our website uses cookies.

13.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

13.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

13.5 We use both session and persistent cookies on our website.

13.6 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

13.6.1 We use Google Analytics to analyse the use of our website.

13.6.2 Our analytics service provider generates statistical and other information about website use by means of cookies.

13.6.3 The analytics cookies used by our website have the following names: `_ga`, `_gid`, `_gat`, `__utma`, `__utmt`, `__utmb`, `__utmc`, `__utmz` and `__utmv`.

13.6.4 The information generated relating to our website is used to create reports about the use of our website.

13.6.5 Our analytics service provider's privacy policy is available at: [\[http://www.google.com/policies/privacy/\]](http://www.google.com/policies/privacy/).

13.7 Most browsers allow you to refuse to accept cookies; for example:

(a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";

(b) in Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and

(c) in Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

13.8 Blocking all cookies will have a negative impact upon the usability of many websites.

13.9 If you block cookies, you will not be able to use all the features on our website.

13.10 You can delete cookies already stored on your computer; for example:

(a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);

(b) in Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and

(c) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

13.11 Deleting cookies will have a negative impact on the usability of many websites.

13.12 We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the 'about Hotjar' section of [Hotjar's support site](#).

Data protection registration

14.1 We are registered as a data controller with the UK Information Commissioner's Office.

14.2 Our data protection registration number is ZA096015

Our details

15.1 This website is owned and operated by The Co-operative College.

15.2 We are registered in England and Wales under registration number 1159105, and our registered office is at Holyoake House, Hanover Street, Manchester, M60 0AS

15.3 Our principal place of business is at Holyoake House, Hanover Street, Manchester, M60 0AS

15.4 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.
- (e) by contacting our data protection officer Steve Kingman on 0161 819 3000.

Complaints

16.1 If you have a complaint about us, or the treatment of your data, you can contact the Charity Commission. The Charity Commission is the independent watchdog for charities.

You can make a complaint about a charity on their website at www.charity-commission.gov.uk.

If you've got a complaint about our fundraising activities you can also complain to the Fundraising Standards Board (FRSB).

To find out whether a charity is an FRSB member and how to go about making a complaint, go to the FRSB public website at www.givewithconfidence.org.uk