
Issued for:	The Smallpeice Trust (incorporating Arkwright Engineering Scholarships)	Number:	CP 001
Subject:	External Privacy Policy	Issue Date:	Oct 2018

External Privacy Policy & Procedure

PURPOSE

This Policy is the responsibility of The Smallpeice Trust's Management Team who will also control implementation of its policy with The Smallpeice Trust (incorporating Arkwright Engineering Scholarships) and its third parties, customers, suppliers and sponsors.

PROCESS OWNER

Company Secretary

PROCESS PARTIES

Third Parties
Customers
Suppliers
Sponsors

SCOPE OF POLICY

The policy covers The Smallpeice Trust (incorporating Arkwright Engineering Scholarships) and its third parties, customers, suppliers and sponsors. It will be reviewed on an annual basis.

INTRODUCTION

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

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

If you are under 18 years old, please refer to our children's privacy policy.

For the purpose of UK data protection laws, the data controller is The Smallpeice Trust of Holly House, 74 Upper Holly Walk, Leamington Spa CV32 4JL.

DATA PROTECTION PRINCIPLES

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

- processed lawfully, fairly and in a transparent manner
- processed for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and kept up-to-date
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

INFORMATION YOU GIVE TO US

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

- **Identity Data**, such as your name, username or similar identifier, marital status, title, date of birth, gender, school
- **Contact Data**, such as your billing address, address, email address and telephone numbers,
- **Financial Data**, such as bank account and payment card details, donation / sponsorship amounts

- **Transaction Data**, including details about payments to and from you, and other details of products and services you purchase from us
- **Technical Data**, including 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
- **Profile Data**, such as your username, password, purchases made by you, your interests, preferences, feedback and survey responses, education details
- **Usage Data**, including information about how you use our website, products and services, and
- **Marketing Data**, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

'SPECIAL CATEGORY' DATA

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.

During the course of dealing with you, we may collect the following 'special category' data about you:

- information about your race, ethnicity, religious beliefs, sexual orientation and political opinions
- trade union membership
- information about your health, including medical conditions and sickness records
- information about criminal convictions and offences
- photographs

HOW WE COLLECT YOUR PERSONAL INFORMATION

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

- placing orders for products on our website
- raising an enquiry on our website
- participating in discussion boards or other social media functions on our website
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you e.g. signing up for our newsletters and brochures
- corresponding with us by phone, email, letters or otherwise
- applying to one of our Arkwright Engineering Scholarships
- applying to attend one of our Aspire Experiences, Residential Courses, STEM Days
- giving us your business card

- requesting further information about our services
- supporting us through a donation

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google)
- advertising networks
- search information providers
- providers of technical, payment and delivery services
- Companies House, LinkedIn and the electoral register
- Charity Commission website
- funding websites
- your employer

HOW WE USE YOUR PERSONAL INFORMATION

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

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- provided we have your explicit consent to 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 explicit consent,
- where it is necessary for reasons of substantial public interest,
- where you have previously made that data public knowledge, or
- if we need to use that data to establish, exercise or defence legal claims

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To register you as a new student or client of ours	It will be necessary for the performance of the contract between you and us
To process your order and, if accepted, to deliver the products to you (including managing payments, fees and charges) e.g. 'Think Kit'	It will be necessary for the performance of the contract between you and us
To process your order for one of our products e.g. our Think Kits using a third-party provider to process the payment.	We need to receive payment to be able to send you a Think Kit or other product. Also, to be able to despatch the Think Kit or other product, using a delivery service.
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for products that you have ordered from 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
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information
To enable you to participate in a prize draw, competition or complete a survey	It will be necessary for our legitimate business interests, namely to study how customers use our products, to develop them and help grow our business

<p>To provide you with information about courses and events that are similar to those that you have already received from us</p>	<p>Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive</p> <p>In all other cases, we will only do this if you give us your consent</p>
<p>To review your application for one of our:</p> <ul style="list-style-type: none"> • Arkwright Engineering Scholarships. • Aspire Experiences • Residential Courses • STEM Days 	<p>We need to be able to review your application for you to participate in one of our programmes.</p>
<p>To respond to your enquiries regarding one of Arkwright Engineering Scholarships, Aspire Experiences, Residential Courses and STEM Days. Once we retrieve your enquiry, your contact details will be passed on to one of our team members to contact you regarding your requirements and to fill out a booking form.</p>	<p>We need to be able to respond to you and to ensure that you are aware of the latest programmes available and that we have the correct information on our booking forms.</p>
<p>To provide you with a brochure giving details of one of our courses, which you have requested through our website.</p>	<p>We need to use this information to be able to send you a brochure.</p>
<p>To provide you with a newsletter via email so that you have the latest information about our programmes.</p>	<p>We will only do this if you agree to receive a newsletter by ticking the relevant box on the application form to give your consent.</p>
<p>Where you are a parent of a child receiving/ or have received the benefit of one of our Scholarships or courses, to ask you for a contribution to our trust.</p>	<p>We will only do this if you consent to us contacting you for this reason in advance.</p>
<p>In order to gain all the required information from parents and teachers to support an application for one of our Scholarships or for a potential application to participate in one of our courses.</p>	<p>We are using your personal data to support your application.</p>
<p>To release Scholar contact information to sponsor to be able to contact their Scholar.</p>	<p>We will need your personal information to complete this.</p>
<p>To administer and improve our website and to keep our site safe and secure.</p>	<p>We are allowed to use this information to ensure you receive the best experience possible when accessing and using our website.</p>
<p>To process your donation / sponsorship and send a thank you letter.</p>	<p>We will need your personal information to complete this.</p>

To release sponsor contact information to Scholar to be able to contact their sponsor.	We will need your personal information to complete this.
To release sponsor nominated representative information to enable them to attend an event.	We will need your personal information to complete this.
To release sponsor contact information to Scholar to allow mentoring within the Scholarship programme.	We will need your personal information to complete this.
Where you are a donor we will collect & store information as to whether you are a tax payer so that we can claim Gift Aid.	We will need your personal information to complete this.
Any other purpose that we notify to you, but is not expressly listed in this table	We will only do this if you give us your consent by some specific, informed and unambiguous method.

We will only use your personal information for the purpose(s) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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

We work closely with other third parties (including, for example, sponsors, mentors, schools and universities, volunteers, donors, payment and delivery services, analytics providers, search information providers). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

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

It is a contractual requirement for you to provide us with certain information, namely your name, address, email address application form detailing information about you, and debit/credit card information if purchasing a 'Think Kit'. If you do not provide us with that information, we will be unable to accept your application and/or process your order and deliver the products to you.

SPONSORS AND DONORS

We may carry out research and profiling to determine whether an individual or company could be a potential donor or sponsor. We may complete analysis and profiling of our potential supporters and rely on legitimate interest to do so. Where we do this, we will consider any potential impact on you and ensure that your rights under Data Protection laws are protected. We may use publicly available information from third party sources such as:

- Companies house
- Funding websites

- Charity Commission website
- LinkedIn profiles

Please see 'How we combine and analyse the information we collect about you' to find out more.

The type of information we will collect may include:

- Gift capacity
- Areas of charitable interest
- Previous donations / sponsorships

HOW WILL WE COMBINE AND ANALYSE THE INFORMATION WE COLLECT ABOUT YOU?

Before contacting you, we may use data analysis to interpret your data and predict how likely you are to be interested in or responsive to a particular campaign or fundraising message. Where we have identified that you have the capacity and/or affinity to support The Smallpeice Trust (incorporating Arkwright Engineering Scholarships) at a higher level, we may collect additional information about you (see 'How we use your information') and combine, analyse and compile that information into a profile of you in order to assist us in engaging with you in a more personalised way.

We typically look at and combine information published in the media but other commonly used publicly available sources including company resources, the Electoral Register and any data you choose to make public on LinkedIn. We may also use any publicly available data that you share on social media. We may use additional information such as geographical information for measures of affluence where available. In order to do this efficiently, we may use trusted third-party specialist companies that collate and analyse information from public registers alongside statistical social-economic data to automate some of this work. This helps us to understand more about your interests and level of potential engagement or donation.

Please note that before seeking or accepting major donations we are required to conduct a minimum level of due diligence. This is in accordance with our legal and regulatory obligations and our internal risk management policies and procedures. This means that if you opt out of analysis of your data for due diligence purposes, we may not be able to accept donations from you.

COOKIE POLICY

Our website uses cookies to distinguish you from other users of 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:

__cfduid	To protect our website from security threats such as hackers and to improve its performance our site is routed through CloudFlare.
_ga	Set by Google Analytics and is used to distinguish users.
_gid	Set by Google Analytics and is used to distinguish users.
_gat	Set by Google Analytics and is used to throttle the request rate.
_dc_gtm_	Set by Google Analytics and is used to throttle the request rate.
Lang	This cookie is set due to Twitter integration and sharing capabilities for the social media.
personalization_id	This cookie is set due to Twitter integration and sharing capabilities for the social media.
IDE	This cookie is used for re-targeting, optimisation, reporting and attribution of online adverts.

DSID	This cookie is used for re-targeting, optimisation, reporting and attribution of online adverts.
PHPSESSID	A unique ID number allowing the website to store information about a visitor maintaining data between page loads.
accept_cookies	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, 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.

- Purchase data, where you have purchased a product through our website.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with the parties set out below:

- other companies within our group, including The Smallpeice Trust and The Arkwright Scholarships
- providers of IT and system administration services to our business including Probrand, Mailchimp, and Adept
- our professional advisers (including solicitors, bankers, auditors and insurers),
- HM Revenue & Customs, the Information Commissioner's Office, The Charity Commission, regulators and other authorities who require reporting of processing activities in certain circumstances,
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this policy.
- sponsorship recipients
- donation recipients
- donors

If you have applied to one of our scholarships or courses, with:

- any of our scholarship sponsors
- any of our scholarship or course providers
- any of our scholarship mentors
- any of our course insurers
- with your parents or guardians;
- with your (or your child's) school and teachers;
- with any suppliers required to fulfil your order for a course or Think Kit;
- with our analytics and search engine providers that assist us in the improvement and optimisation of our site.

Please be aware that due to our charitable nature, our list of sponsors, donors, course providers and mentors may change throughout the year depending on who is able to offer us these services or sponsorships. This may mean that when you apply for a course or sponsorship, additional providers are found in the time between your application and our offer to you. We recommend that you keep up to date with our list of third party sponsors / providers at www.smallpeicetrust.org.uk and www.arkwright.org.uk

If there are any particular sponsors or course providers you do not wish us to share your personal data with, please let us know immediately.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

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 reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **PCI DSS standards.** We comply with the Payment Card Industry Data Security Standards in relation to debit/credit card payments made on our website.
- **Building entry controls.**
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding or destruction in a manner that ensures confidentiality.
- **Firewalls.**
- **Encryption.**
- **Overseas transfers.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE WILL STORE YOUR PERSONAL 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 a legal obligation to which we are subject	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 demonstrate the reason why we are using/storing your data overrides 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 specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained 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.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- 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 legitimate reason to use the information. Please note that we may continue to store your information or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- 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**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal 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

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

OPTING OUT OF RECEIVING MARKETING COMMUNICATIONS

You can ask us to stop sending you marketing communications at any time by contacting 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

AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections 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. 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, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to 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

REVISION AND ISSUE STATUS

External Privacy 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 3	23/08/18	Amended typing error	N Smith
V1.2	Page 16	23/08/18	Added reference to Data Governance Policy	N Smith
V1.3	Page 16	31/10/18	Removed reference to Data Governance Policy	N Smith