

Livery Schools Link Ltd - Privacy Policy

Welcome to Livery Schools Link Privacy Notice.

Livery Schools Link (collectively referred to as "LSL", "we", "us" or "our" in this privacy notice) respect your privacy and are committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Please note that this Privacy Policy may be updated from time to time, so please remember to check back on a regular basis. This version was last updated on 24th May 2018. When we do make changes to this Privacy Policy we will state so on our website or contact you regarding the changes.

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1. Important information and who we are

Purpose of this privacy notice

We are a charity working with Livery Companies of the City of London and schools to benefit young people in education - all the personal data that we process is in pursuit of these aims.

This Privacy Policy aims to give you information on how LSL collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us about use our services or sign up to our marketing materials.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Controller

Under the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"), LSL is the "data controller" responsible for the processing of your personal data.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.

Third-party links

This 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 policy/notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the following broad categories:

- **Identity Data** includes first name, last name, username or similar identifier, title
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login 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 this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. If we combine or collect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data

Data Protection Law recognises that some categories of personal information are more sensitive than others and therefore greater care must be taken when processing it.

These Special Categories of Personal Data includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

If we were to process such information, we would obtain your express consent before processing this type of information or rely on our legitimate activities under GDPR Article 9(2)(d).

We may also process information about criminal convictions and offences in accordance with relevant legal requirements.

We do not collect data of this nature at present and have no current plans to do so.

3. How is your personal data collected?

We use different methods to collect data from and about you, including through:

Direct interactions. You may give us your identity and contact details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- fill in forms on our website;
- correspond with us by phone, email or other means;
- subscribe to our services and publications;
- apply to us, for instance to work as a volunteer or with a volunteer;
- give us feedback, including reporting issues with our site;

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. Please see below for further information under Section 5 "Cookies". Information that we may collect from you includes:

- 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;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time);
- services, schools, postings that 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), and methods used to browse away from the page and any phone number used to call us.

Third parties. We work closely with a number of Third Parties [see Glossary] and may receive personal data about you from them. For instance the schools and educational organisations we work with may provide us with information including feedback on individuals who volunteer through us with these organisations.

Publicly available sources. We may collect information about you from publicly available sources. For instance, we may collect publically available information when reviewing the qualifications and background of individuals who wish to volunteer through LSL.

4. How we use your personal data

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

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Examples of where we have a legitimate interest to process your personal data include using your information for data analytics, to conduct research to better understand what our partners and volunteers want and/or need, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email, or in certain circumstances where we process special categories of personal data. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purposes for which we will use your personal data

We only process personal data when we have a lawful ground for doing so.

You can find out more about the purposes and grounds for processing personal data [here](#).

Marketing and Promotions

We may wish to contact you by phone, email, text message or post for promotional purposes in order to keep you informed of our services and events or where you have entered one of our surveys or competitions. We shall only contact you in this manner if you have agreed that you would like to receive marketing material.

You are free to [contact us](#) at any time to alter your choices about how we contact you for marketing purposes or to inform us that you no longer wish to receive marketing material (such material sent to you by email contains an "unsubscribe" option that you can click on).

We never store personal data with third parties for marketing purposes.

Change of purpose

We will only use your personal data for the purposes 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Cookies

What are cookies?

A "[Cookie](#)" is a term used to describe a small text file which is downloaded onto your electronic device when you visit a website. This allows the website to recognise the device, increasing the efficiency of the website and gathering information about your use of the website.

What cookies do we use and why?

This website uses 'session' cookies to distinguish you from other users of the website. This helps LSL to provide you with a good experience when you browse the website, and also enables us to compile statistics that help us to understand how the website is used and to improve its structure.

This website also uses 'persistent' cookies, which are cookies that remain in the cookies file of your browser for longer and help LSL to recognise you as a unique visitor to the website.

For further information on these types of cookies and how they work, we recommend that you refer to the International Chamber of Commerce's [UK Cookie Guide](#).

This website's analytics cookies include Google Analytics.

Can I alter cookie settings?

Yes, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. If you have questions about how we use cookie, please [contact us](#).

LSL will not store any personal data that you provide in your cookies.

You may also delete cookies at any time by going to the browsing settings on your web browser.

For details about how to adjust your cookie settings in the following browsers, please visit the relevant link:

Internet Explorer:

<http://windows.microsoft.com/is-is/internet-explorer/delete-manage-cookies#ie=ie-11>

Firefox:

<http://support.mozilla.org/en-US/kb/Cookies>

Chrome:

<http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

Safari:

<http://support.apple.com/kb/PH17191>

iOS:

<http://support.apple.com/kb/HT1677>

6. Disclosures of your personal data

LSL works in close collaboration with a number of trusted Third Parties [Glossary], in particular schools, other educational organisations and consultants, business partnerships, Livery Companies and suppliers.

In addition to LSL's own staff sharing your personal data, we may also share it with these trusted Third Parties in the course of our charitable activities, such as for volunteering purposes.

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

We may disclose your personal data if required to do so by law (such as when complying with applicable laws, regulations and codes of practice or in response to valid requests from competent authorities).

7. Data security

Looking after your personal data is a priority for us.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and Third Parties who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

The unfortunate reality is that there are security threats on the internet and transmitting personal data online cannot be completely secure. While we use our best endeavours to safeguard your online personal data, we cannot guarantee the security of such data when it is transmitted to our website.

Our website may contain links to sites belonging to other organisations. We endeavour to only share links which maintain high standards when it comes to data protection and privacy. However, we are not responsible for how these organisations manage data privacy, so we encourage you to always refer to their privacy policies.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We will keep your information for a period of sixty (60) days following notification from you that you no longer wish to use the Services. Once this period expires, we will delete it

9. Your legal rights

Under certain circumstances, you have rights under the Data Protection Law in relation to your personal data. Please click on the links below to find out more about these rights:

- [*Request access to your personal data*](#)
- [*Request correction/rectification of your personal data*](#)
- [*Request erasure of your personal data*](#)
- [*Object to processing of your personal data*](#)
- [*Request restriction of processing your personal data*](#)
- [*Request transfer of your personal data*](#)
- [*Right to withdraw consent*](#)
- [*Right against automated-decision making.*](#)

If you want more information about or wish to exercise any of the rights set out above, please [contact us](#).

As mentioned in Section 7 on Data Security, our site may, from time to time, contain links to and from the websites of partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Automated Decision-Making (ADM): when a decision is made which is based solely on Automated Processing (including profiling) which produces legal effects or significantly affects an individual. The GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not Automated Processing.

Automated Processing: any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. Profiling is an example of Automated Processing.

Consent: agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signify agreement to the Processing of Personal Data relating to them.

Data Controller: the person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the GDPR. We are the Data Controller of all Personal Data relating to our Company Personnel and Personal Data used in our business for our own commercial purposes.

Data Subject: a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

Data Protection Officer (DPO): the person required to be appointed in specific circumstances under the GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to the Company data privacy team with responsibility for data protection compliance.

Explicit Consent: consent which requires a very clear and specific statement.

General Data Protection Regulation (GDPR): the General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR.

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Sensitive Personal Data and Pseudonymised Personal

Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Personal Data Breach: any act or omission that compromises the security, confidentiality, integrity or availability of Personal Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure or acquisition, of Personal Data is a Personal Data Breach.

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, by automated means or otherwise, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Pseudonymisation or Pseudonymised: replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

Special Categories of Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Third parties with whom we may share your personal data include but are not limited to:

- Schools - We work closely with a number of schools and educational organisations. See the [Schools](#) section of our website for further details.
- Livery Companies - for more details on livery companies with whom we work see the [Livery Companies](#) page of our website.
- Volunteers - for more details on our volunteers see the [Volunteers](#) page of our website.
- Partners - see the [Partners](#) page of our website for the list of organisations with whom we collaborate.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Service providers like analytics and search engine providers, that assist us in the improvement and optimisation of our site who provide IT and system administration services.
- Suppliers and sub-contractors for the performance of any contract we enter into with them or you.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process 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), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Object to automated-decision making, meaning decision-making which takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

