

Privacy Policy

Maintaining your privacy is important to us. You entrust us with sensitive information, and we take that responsibility seriously.

Revisions

This policy was updated on 22nd January 2025 because we have started to collect additional data from some of our supporters.

This policy was updated on 11th July 2023 in line with GDPR requirements.

It may be updated in the future, and we will post the latest version here on our website.

1. General information

Universify Education (“we”, “us”, “our”) takes security and privacy seriously. This Privacy Policy explains how we collect, store, and use personal data when you browse www.universifyeducation.com (the “Universify Education website”), or otherwise provide your personal data to us. Please read this Privacy Policy carefully to understand how we will treat your personal data.

“Our Supporters” include both existing and potential.

This Privacy Policy should be read together with our [Terms and Conditions](#) and [GDPR note](#), which together applies to your use of the Universify Education website and participation in Universify Education events; programmes, and fundraising.

2. What information do we collect?

YOUR PERSONAL DATA

Our programme beneficiaries - when we say your “personal data”, we mean any information that identifies any person, that you provide to us, or that is contained in any other information that you provide to us (or that you authorise a third party to give to us on your behalf). Your personal data may also be contained in information that we collect about you in connection with your use of the Universify Education website and/or Universify Education. The data that you provide Universify Education, or that is provided to Universify Education from you, such as impact measurement surveys, isn’t part of the “personal data” discussed here, unless it identifies a person.

When it comes to your personal data, we comply with our obligations under the General Data Protection Regulation and any other applicable data protection legislation.

Information you provide – Your personal data includes the information you provide, or that you authorise someone else to provide, when you apply and attend the programme, volunteer to collaborate with it, or sign up to receive our emails on the Universify Education website. It also includes information you provide when you complete any forms which you submit to us. Examples of this personal data include your name, your email address, date of birth, and any correspondence when you contact us.

We collect special categories of personal data, as defined under GDPR. These special categories include medical and dietary information and ethnic background. We ask for medical and dietary information to enable us to accommodate student needs while they are attending our courses. We ask about ethnic background to ensure we work with a diverse range of students, however we give students the option to not answer this question. Universify Education is directed at children who could be under the age of 16. In agreeing to the terms and conditions, and this privacy policy, we assume that any student under 16 has received the consent of their parent or guardian.

Information we collect – We collect information about website usage to improve our service and to understand trends to enhance and customise content and advertisements. We avoid collection of “personal data”, where it identifies a person. Here is the information that we collect and how we use it:

- We monitor patterns of usage so we can understand how people are using Universify Education to develop and improve our website.
- We monitor traffic information when users visit our site or read our emails, including things like page visits, email clicks, referring sites, and video viewings. We use this information to improve our website, advertising, promotions, and to understand user behaviour.

Information others provide to us – We may receive information from others (e.g. teachers about the students) that you have authorised that third party to provide to us. This could include the initial information to enable us to confirm student eligibility for the programme (e.g. your predicted grades, whether you receive Pupil Premium or Free School Meals).

Our supporters - At a base level, we aim to collect your name and address. This is because we cannot match past or future donations to the same person by name alone and because, should you complete a Gift Aid declaration, HMRC requires full

name and address details for a claim to be valid. We also ask for email addresses because it's a cost-effective way to keep in touch. We try to complement postal communication with email communication, but only if you have told us you're happy for us to email you. Supporters must let us know if they move house, even if they have opted out of receiving letters. This is because your Gift Aid declaration is only valid if matched against a current address and we do not currently pay for Royal Mail's National Change of Address service.

For some supporters, we seek to conduct wealth research profiling to better understand you and your philanthropic priorities. We collect personal information such as job title, directorships, contact information, demographic data, including estimated income and property value, date and size of previous donations to other charities, and details of philanthropic activities. To source this data we use search engines, the press, social media (e.g. LinkedIn) and reputable public data sources, including Companies House, and The Charity Commission. In addition to in-house research, we may also use third-party independent research companies such as Factory and Prospecting for Gold.

3. What do we use your data for?

Our programme beneficiaries - we use your personal data to enable us to deliver our programme to students and to measure the impact of our programme. Impact measurement enables us to work to fulfil our charity objective and to improve our programme for future students. It will also enable us to contact you by email, post, SMS, social media or telephone where necessary concerning Universify Education.

We may use third parties to assist us in providing Universify Education from time to time, and in those cases may pass on your personal data to them. In such cases we will only share your data with third parties that we trust, and where there are assurances in place as to how they will protect the data in accordance with GDPR.

Contacting you for marketing purposes – We may use your personal data to contact you by email, fax, post, SMS, social media and /or telephone to let you know about Universify Education. We will only use your data in this way where you have provided consent, or where we are otherwise entitled by law to do so. If you would like us to stop providing you with such notifications, just contact us using the details below. Please note, this may take up to one working day to take effect.

To stop receiving emails from Universify Education please email info@universifyeducation.com.

We may contact you if the specific arrangement we have in place with a third party which impacts you is changing and/ or coming to an end and to let you know what will take place next.

Legal requirements – We may use your personal data to comply with any legal obligations to which we are subject.

We shall periodically check that the personal data we store for you is accurate. If you would like to update the personal data we hold about you, please contact us at info@universifyeducation.com with your request.

Our supporters - We know people support our work for a variety of reasons. It helps us in the fundraising team to understand what those reasons are, so we can appropriately communicate with you. But for us to communicate with you the right way, we do need to have an accurate picture of who you are. This means we may ask you to let us know what motivated you to donate, or how you feel about our work. The information you provide offers insight that we analyse to plan our activities and communications.

If someone has provided an address in writing we can't decipher, we will use Royal Mail's address finder service. When we send planned appeals, we may use a screening company to check that no one on the list has recently passed away. The last thing we want to do is send an appeal bearing the name of a lost loved one only for their next of kin to receive it.

We also analyse email results, such as open rate and click-through. We don't want to waste anyone's time on emails that no one is reading, so it is important to be able to see what messaging people are interested in.

4. Why do we use your personal data?

Our programme beneficiaries - We collect and use your personal data for a variety of reasons. We need some data to enter into and perform our contract with you and deliver the Universify Education programme to you – for example your contact details and other information requested during the Universify Education setup process. If you fail to provide such data we will be unable to provide our service to you.

In some circumstances, we may process your personal data because it is required for compliance with a legal or regulatory obligation.

We also use data, including images and testimonials to promote our programme to future participants and supporters.

Finally, your data, such as what you do after the Universify programme, allows us to measure the impact of our programme to understand and improve the value of our work. As mentioned in Section 3, we may contact you from time to time to check and gather up-to-date data for our impact measuring.

Our supporters - As a charity, we rely on donations to fund much of our work. To this end, we seek additional information to conduct wealth research to profile our supporter data and better understand you and your philanthropic priorities.

This research is also important because there is a risk to the charity if we unwittingly align ourselves with someone who would undermine the trust we have built with our beneficiaries or damage our reputation.

We use the grounds of legitimate interest to undertake wealth research and profiling like this. However, if you don't want us to process your data in this way, please contact info@universifyeducation.com.

5. Who do we share your information with?

Our Programme beneficiaries - We will share your personal data with third parties in certain circumstances:

- We will disclose student data to UCAS in order for them to provide anonymous details of whether students go on to apply to university. We will also disclose student data with HEAT, a tracker used by the University of Oxford to see what further programmes students go on to do.
- We will disclose student data to our partners, host universities and university colleges in order to run our programme.
- We may pass aggregate information on the usage of the Universify Education website and Universify Education, where relevant, to maintain, improve and manage the Universify Education website and Universify Education programme, but this will not include your personal data.
- We will use testimonials and images to promote our programme to future participants and supporters.
- We will share your name and email to partner programmes that you have consented to us providing your data to so that you can hear more about these programmes and so that Universify can understand what students do following the Universify programme for the purpose of impact measurement.
- We may share your name with partner programmes to cross check applications to partner programmes. This helps us to understand what students do following the Universify programme and which partner programmes they apply to. We use this information to understand our impact to improve future programmes.

We may also share your personal data with third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation; to cooperate with law enforcement officials in the investigation of unlawful activities of Universify Education website users or relating to Universify Education users; or in order to enforce or apply any contract with you; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We also utilise several carefully selected third parties to help provide our services. Examples of these functions include email, providing marketing assistance and data analysis, and data management. In choosing to work with any such third parties, we will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements we impose and expect, as a minimum. No ownership rights to the data will be transferred to any third party.

The data we collect from you may be transferred to, and stored at, a destination outside the European Union (“EU”) only if they comply with the Privacy Shield framework. By submitting your data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Our sub processors include:

- Salesforce
- Dolt.org
- Google
- NEST
- HMRC
- Charity Commission

We ensure our sub processors are compliant with GDPR and we will engage in DPAs (Data Protection Addendums) with our college and partner institutions.

Our supporters - HMRC for Gift Ad; credit/debit card donations are sent directly to JustGiving and BigGive, our card payment processing partners. Once card details are entered, we do not retain them on our systems; third-party data processors including wealth research companies who are compliant with GDPR.

6. How long do we store your data for?

Programme beneficiaries - As specified in our GDPR note we only store your data for as long as necessary for the purposes of processing set out in this policy.

If you are signed up to marketing communications, you can unsubscribe at every communication or by emailing info@universifyeducation.com.

To prove that Universify is working towards its charity objectives – outlined in its governing documents – we require personalised student data until every student is 24 years old.

When a student reaches that age we will erase their data. All sensitive data, that is not required to track a student's progress to higher education, such as medical and dietary information, will be deleted six months after the completion of the residential aspects of our programme. Students may also request the erasure of their data before this time, by emailing info@universifyeducation.com.

We hold teacher information in order to coordinate student applications and the delivery of the programme to our students. We will hold teacher information (name, school, email address, and phone number) for as long as they act as a lead teacher, or if they ask for us to erase their information by emailing info@universifyeducation.com, if this does not affect students signed up to an existing Universify programme. After two years we will delete the information of any lead teacher with whom we have not had contact.

We hold employee, volunteer, and trustee data for up to 7 years after they have worked with us in order to fulfil statutory limitations.

To ensure the integrity of our systems and your data, we utilise various technologies to continually take secure, encrypted backups.

Our supporters - We will only keep 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.

7. You can access your data at any time

Our programme beneficiaries & supporters - You can request a copy of your data whenever you like – this will include your personal data. Please contact info@universifyeducation.com to request a copy of your data.

8. You can delete your data at any time

Our programme beneficiaries & supporters - You can request the erasure of all your data at any time. You can request erasure of your data by emailing info@universifyeducation.com.

9. What are your rights?

Our programme beneficiaries & supporters - Under the GDPR you have the right to see a full copy of any data we hold about you, and also the right to request that it is fully deleted from our system (although we may be required to keep some records to ensure that you are not contacted in future, or to comply with any legal obligations).

However, to prove that Universify is working towards its charity objectives – outlined in its governing documents – we require personalised student data until every student is 24 years old. When a student reaches that age we will erase their data. All sensitive data, that is not required to track a student's progress to higher education, such as medical and dietary information, will be deleted six months after the completion of the residential aspects of our programme. Students may also request the erasure of their data before this time, by emailing info@universifyeducation.com.

We hold teacher information in order to coordinate student applications and the delivery of the programme to our students. We will ask teachers to provide contextual information to ensure students meet the eligibility criteria. We also ask for teachers to provide information on student's attainment at GCSE to allow us to measure the impact of the programme. We will hold teacher information (name, school, email address and phone number) for as long as they act as a lead teacher, or if they ask for us to erase their information by emailing info@universifyeducation.com, if this does not affect students signed up to an existing Universify programme. After two years we will delete the information of any lead teacher we have not had contact with.

The data you provide will be used to make statistical analysis of the impact Universify Education's programme. Your personal data won't be made public nor shared with partners without a DPA.

10. Security and data storage

Our programme beneficiaries & supporters - We take security and privacy seriously. We will endeavour to take all reasonable steps to keep your personal data secure once it has been transferred to our systems. We adopt appropriate, industry standard data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction.

Where we utilise third parties to help provide our services, we will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements we ourselves impose and expect, as a minimum.

Please note that the internet is not a secure medium and although we will do our best to protect your data, we cannot guarantee the security of any data transmitted to the Universify Education website or through Universify Education itself. Any transmission is at your own risk.

11. Changes to this privacy policy

We may modify or update this Privacy Policy from time to time to reflect the changes in our practices, and so you should review this page periodically. When we make important modifications to this Privacy Policy we will notify you.

This Privacy Policy was last amended on 22nd January 2025.

12. Getting in touch

If you have any queries relating to this Privacy Policy or Universify Education's use of your personal or data, please contact us at info@universifyeducation.com.