

UNIVERSIFY EDUCATION PRIVACY POLICY

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

Version 2.0: This policy was last updated on 21st June 2018 in line with GDPR requirements. It may be updated in the future and we'll post the new version here on our website.

1. General information

Universify Education Education (“we”, “us”, “our”) take 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.

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

2. What information do we collect?

YOUR PERSONAL DATA

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 are in receipt of Pupil Premium or Free School Meals).

3. What do we use your data for?

Delivering the Universify Education programme – 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 object 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.

4. Why do we use your personal data?

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.

5. Who do we share your information with?

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 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 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 a number of 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 ourselves 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 subprocessors include:

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

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

6. How long do we store your data for?

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, or has completed their first university degree, prior to turning 24.

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 co-ordinate 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.

7. You can access your data at any time

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

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?

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, or has completed their first university degree, prior to turning 24. 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 co-ordinate 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

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 6th April 2020.

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.