

# S\_CIAL M\_OBILITY F\_UNDATION®

## SMF PRIVACY POLICY

### Introduction

We take your privacy seriously. This privacy policy explains what Personal Information we collect, when and why we collect it, how we use it, how long we keep it, the conditions under which we may share it with others, how we keep it secure and your rights.

Please click below to find out more:

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**Who are we and how can you contact us**

The Social Mobility Foundation (SMF) is a charity (Registered Charity No. 1115888) which aims to make a practical improvement in social mobility for young people from low-income backgrounds.

If there is anything you are unsure about in this Privacy Policy, feel free to contact us by email at [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or by post at The Social Mobility Foundation, 1st and 2nd floor, 43-47 Leadenhall Market, London, EC3V 1LR.

SMF is responsible for processing the Personal Information you provide to us or we collect from other public sources and is registered with the Information Commissioner's Office in the UK under the General Data Protection Regulation and UK Data Protection Act 2018.

**What type of personal data do we collect?**

SMF collects and uses the types of data listed below so that we can run the charity and deliver the Aspiring Professionals Programme.

To find out more about which types of data we collect please read the relevant heading(s) below:

**Students**

We collect your name, photo, home contact information (address and telephone number), date of birth, gender, family status, educational details (including the name of your school/college and previous school(s)/college(s), any qualifications attained, predicted grades, and any free school meal and/or household income data), details relating to any work experience or job that you may have had or will have (including salary information), personal interests and academic/career aspirations. We may also collect Special Category Data (as defined by the GDPR) from you. This includes information about your ethnic origin and any disabilities or medical conditions you may have.

**Family members/guardians/emergency contacts**

We collect your name, contact information (address and telephone number), educational history and information relating to free school meals and household income.

**Teachers, other education organisations and contacts, charities, employers and volunteers including mentors**

We collect information which may include your name, contact information, employment information, information and opinions relating to your relationship with the SMF or student (for teachers) and information provided to the Social Mobility Foundation by organisations that may perform background checks on you from time to time (including, for volunteers, without limitation, the Criminal Records Bureau and the Independent Safeguarding Authority).

**Donors**

We collect information which may include your name, contact information, employment information and bank details.

### **Job Applicants and Employees**

Please click [here](#) to read about how we collect, process and look after the data of job applicants and employees.

### **Suppliers and other related organisations**

We collect information which may include your name, contact details and bank information.

### **Why do we collect and use personal data?**

The Social Mobility Foundation collects and uses Personal Information for reasons related to meeting the aims for the organisation.

To find out more about how SMF may use your information please read the relevant heading(s) below:

### **Students**

To process your application for a place on our programme, to run the programmes, track your involvement and offer you opportunities, undertake analysis, research and evaluation about our work, *promotional purposes*, and to review career progression.

### **Family members/guardians/emergency contacts**

To contact you in case of an emergency, promotional purposes and to undertake analysis, research and evaluation about our work.

### **Teachers, other education organisations and contacts, charities, employers and volunteers including mentors**

To process your information as a referee/volunteer or mentor/internship provider or supporter (as the case may be), to run our programmes, events and for promotional purposes. To undertake analysis, research and evaluation about our work.

### **Donors**

To process your information as a donor, thank you, for information giving and promotional purposes, and to undertake evaluation about our work.

### **Applicants for employment with SMF and employees**

Please click [here](#) to read about how we collect, process and look after the data of job applicants and employees.

### **Suppliers and other commercial partners**

To enable SMF to do business with you or your organisation, track payments and interactions and undertake other administrative tasks.

### **When do we collect personal data about you?**

We collect information when you are engaging with, participating in, supporting or volunteering in the Aspiring Professionals Programme.

When you interact with us in person, through email and written correspondence, by phone, by social media, or through our website.

When we collect Personal Information from other legitimate sources, such as public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.

We may collect personal data if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected we make sure an assessment is made, ensuring that there is an established mutual interest between you and the Social Mobility Foundation.

**Our legal basis for processing personal data**

**Collecting personal data based on legitimate interest**

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the people we collect data about (data subjects) do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between the Social Mobility Foundation and the individual person has been identified.

This legal basis is primarily related to the delivery of the Aspiring Professionals Programme. We will always inform individuals about their privacy rights and the purpose for collecting personal data.

**Collecting personal data based on consents**

The collection of personal data based on consent from the data subject will be done by using "Consent Forms" that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems. Normally consent is used as a legal basis for marketing/fundraising communications which fall outside our core programme activity.

**Collecting personal data based on contracts**

We use personal information for fulfilling our obligations related to contracts and agreements with commercial partners and suppliers.

**Collecting special category data**

We may collect Special Category Data (as defined by the GDPR in article 9 of the Regulation) from students on application to the Aspiring Professionals Programme or for specific activities in the case of health information. This includes information about your ethnic origin (collected under article 9 (2) condition (g) – significant public interest) and any disabilities or medical conditions you may have (collected under article 9 (2) conditions (c) and (h) for health emergency or occupational health reasons).

**Who has access to your personal data?**

Within the Social Mobility Foundation, access to your Personal Information is restricted to the employees of the Social Mobility Foundation on a need-to-know basis or as required by law.

**How long do we keep it?**

We'll keep your Personal Information for as long as we need it to deliver and evaluate the Aspiring Professionals Programme.

We also keep information about students for research purposes.

We may also keep it to comply with our legal obligations, resolve any disputes and enforce our rights. These reasons can vary from one piece of information to the next and depend on your involvement with SMF, so the amount of time we keep your personal information for may vary.

In all cases, our need to use your Personal Information will be reassessed on a regular basis, and information which is no longer required for any purposes will be disposed of safely.

### Your rights to your personal data

It is important that you understand your rights in relation to your Personal Information and how you can contact us if you have questions or concerns.

If you have any questions, comments or concerns about how we handle your Personal Information, then you may contact us by sending an email to [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or go to [www.socialmobility.org.uk](http://www.socialmobility.org.uk) and complete a **Contact Us** form.

You have the right to tell us if you:

- don't want to be contacted in the future by us
- would like a copy of the Personal Information which we hold about you
- would like us to correct, update, or delete your Personal Information in our records
- wish to report any misuse of your Personal Information
- want to withdraw your consent to receiving marketing information and event invitations

To help us to deal with your request, please always provide your full name and contact information.

To help us to maintain accurate Personal Information, you must advise us of any changes to your Personal Information. In the event that the Social Mobility Foundation becomes aware of any inaccuracy in the Personal Information that the Social Mobility Foundation has recorded, the Social Mobility Foundation will correct that inaccuracy at the earliest practical opportunity.

### Use of cookies

We use cookies in a variety of ways. SMF cookie policy is available [here](#).

### Do we share your data with anyone?

We share your data for specific reasons only, mainly related to delivering and carrying out research into the Aspiring Professionals Programme. We do not share or trade your information without securing your consent in advance except as described in the boxes below.

To find out more about how SMF may share your information please read the relevant heading(s) below:

#### Students

We may share your Personal Information with your teachers, your parents, the organisations with which we place you (or propose to place you), organisations you wish to apply to or are applying to for employment, your mentors, prospective supporters (e.g. charitable trusts) and current funders of the Social Mobility Foundation.

### **Family members/guardians**

We may share your Personal Information with the organisations in which we place your family member/ward (or propose to place your family member/ward) or in case of emergency with organisations involved.

### **Individuals attending events and activities hosted by SMF partner organisations:**

We may share data with hosting organisations for registration and health and safety purposes, or to comply with legal or professional requirements. This data will not be used for marketing purposes.

### **If required by law:**

We will disclose your Personal Information if required by law or if we, as an organisation, reasonably believe that disclosure is necessary to protect our organisation's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

### **Where in the world do we send Personal Information?**

The Social Mobility Foundation has taken steps to set up appropriate data protection and information security requirements with organisations/ recipients to confirm that Personal Information is properly protected in accordance with this Policy and applicable laws. If necessary and in accordance with applicable laws, the Social Mobility Foundation may disclose Personal Information to our outside professional advisers and to other third parties that provide products or services to the Social Mobility Foundation, such as IT systems providers, trainers and consulting firms.

Where the processing of Personal Information is delegated to a third party data processor, such as those listed above, the Social Mobility Foundation will choose a data processor that provides sufficient guarantees about the technical and organisational security measures governing the relevant processing and will ensure that the processor acts on our behalf and under our instructions.

### **For students, family members/guardians, emergency contacts, teachers, employers, volunteers and mentors:**

Most of the recipients of the Personal Information that the Social Mobility Foundation collects from you will be located in the United Kingdom. However, some of your Personal Information may be transferred to servers located in the United States of America for the purposes of securely storing this information.

### **Changes to this privacy policy**

We may update this Privacy Policy at any time and ideally you should check it regularly for updates. We won't alert you to every minor change, but if there are any really important changes to the Policy or to how we use your information we'll let you know and where appropriate ask for your consent.

### **Your right to complain**

If you are unhappy with the way in which your personal data has been processed, in the first instance, contact us by email at [privacy@socialmobility.org.uk](mailto:privacy@socialmobility.org.uk) or by post at The Social Mobility Foundation, 1st and 2nd floor, 43-47 Leadenhall Market, London, EC3V 1LR.

If you remain dissatisfied, then you have the right to apply directly to the UK national supervisory authority for a decision. The supervisory authority for the United Kingdom can be contacted at: Information Commissioner's Office (ICO), [ico.org.uk](https://ico.org.uk)