

# SOCIAL MOBILITY FOUNDATION PRIVACY POLICY

## 1. PURPOSE

**The Social Mobility Foundation** ("we", "us", "our") has prepared this Privacy Policy ("Policy") to outline our practices regarding the collection, use, disclosure, transfer and other processing of individually identifiable information about you ("Personal Information"). The Social Mobility Foundation will process any Personal Information fairly and lawfully and in accordance with the Data Protection Act 1998 ("DPA").

For the purposes of the DPA, the data controller is The Social Mobility Foundation, Grosvenor Gardens House, 35-37 Grosvenor Gardens, London, SW1Q 0BS.

## 2. PERSONAL INFORMATION COLLECTION AND PURPOSES OF USE

### A. Personal Information Collection

Subject to this Policy, the Social Mobility Foundation will treat as confidential the Personal Information that the Social Mobility Foundation collects about you. The Social Mobility Foundation may collect the following categories of Personal Information:

**(1) For students:** 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 education maintenance allowance details), 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 **Sensitive Personal Data** (as defined by the DPA) from you. This includes information about your ethnic origin and any disabilities or medical conditions you may have.

**(2) For family members/guardians/emergency contacts:** Your name, contact information (address and telephone number), educational history and information relating to education maintenance allowance.

**(3) For teachers, employers and mentors:** Your name, contact information, opinions, employment information, information relating to your relationship with the student and information provided to the Social Mobility Foundation by organisations that may perform background checks on you from time to time (including, without limitation, the Criminal Records Bureau and the Independent Safeguarding Authority).

### B. Purposes of Use of Personal Information

The Social Mobility Foundation may use the Personal Information listed above for the following purposes:

**(1) For students:** To process your application for a place on our programmes, various administrative purposes in connection with the operation of the programmes, for statistical purposes, promotional purposes, programme evaluation purposes and for the purposes of reviewing career progression.

(2) **For family members/guardians/emergency contact:** For statistical purposes, to contact you in case of an emergency, promotional purposes and programme evaluation purposes.

(3) **For teachers, employers and mentors:** For the purpose of processing your information as a referee/mentor/internship provider (as the case may be), administrative purposes in connection with the operation of our programmes, promotional purposes, and programme evaluation purposes.

### 3. ACCESS BY THE SOCIAL MOBILITY FOUNDATION STAFF

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.

### 4. DISCLOSURE AND INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

**For students:** We may disclose your Personal Information to your teachers, your parents, the organisations in which we place you with (or propose to place you with), your mentors, prospective supporters (e.g. charitable trusts) and current funders of the Social Mobility Foundation.

**For family members/guardians:** We may disclose your Personal Information to the organisations in which we place your family member/ward (or propose to place your family member/ward).

**For students, family members/guardians, emergency contacts, teachers, employers 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 such Personal Information. The Social Mobility Foundation has taken steps to establish appropriate data protection and information security requirements with such 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 delegate such processing in writing, will choose a data processor that provides sufficient guarantees with respect to technical and organisational security measures governing the relevant processing and will ensure that the processor acts on our behalf and under our instructions. In addition, the Social Mobility Foundation will impose in writing appropriate data protection and information security requirements on such third party data processors.

## **5. CHANGES TO THE POLICY**

Should the Social Mobility Foundation decide to substantially modify the manner in which the Social Mobility Foundation collects or uses Personal Information, the type of Personal Information that the Social Mobility Foundation collects or any other aspect of this Policy, the Social Mobility Foundation will notify you as soon as possible of such changes by reissuing a revised Policy on our website ([www.socialmobility.org.uk](http://www.socialmobility.org.uk)), or taking other steps in accordance with applicable laws.

## **6. ACCURACY OF AND ACCESS TO YOUR PERSONAL INFORMATION**

You are entitled to access Personal Information held about you (subject to limited exceptions). In addition, you have the right to have inaccurate Personal Information corrected or removed and to object to the processing of your Personal Information. If you wish to access such Personal Information, you should apply in writing to the Chief Executive Officer of the Social Mobility Foundation at the address set out on our website ([www.socialmobility.org.uk](http://www.socialmobility.org.uk)). We may charge you a small administrative fee to access your data (which is currently £10).

To assist us in maintaining 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.

The Social Mobility Foundation will maintain Personal Information for as long as it is required to do so by applicable laws or for as long as necessary for the purpose(s) for which it was collected. The Social Mobility Foundation will delete Personal Information when it is no longer needed and, in any case, upon expiration of the maximum storage term required by applicable law.

## **7. SECURITY**

The Social Mobility Foundation maintains appropriate technical and organisational security measures to protect Personal Information against accidental or unlawful destruction, or accidental loss, alteration, unauthorised disclosure or access, in compliance with applicable laws.

## **8. QUESTIONS ?**

Please address all questions to the Chief Executive Officer of the Social Mobility Foundation at the address set out on our website ([www.socialmobility.org.uk](http://www.socialmobility.org.uk)).