

# PRIVACY POLICY

## 1. Introduction

FIRST UK is a registered charity in England and Wales (1178433) trading as FIRST Tech Challenge (referred to as "**FIRST**" "**we**" "**us**") with its registered address at FIRST Tech Challenge UK, 11 Upper Brook Street, London, W1K 6PB.

The COO of the charity acts as data protection manager. If you have any questions or comments, please contact [privacy@firsttechchallengeuk.org](mailto:privacy@firsttechchallengeuk.org).

This policy explains:

- What personal data we collect and how we use it
- The legal basis for processing your personal data
- Where we collect information about you from
- How we keep your data safe and who has access
- Keeping your information up to date
- Right of access and correction of your information
- Changes to this Policy.

## 2. What personal data we collect and how we use it

### 2.1. Supporters

If you support us, for example make a donation, volunteer, register to fundraise, or sign up for an event we will usually collect:

- Your name
- Your contact details
- Your date of birth
- Your bank or credit card details.

Where it is appropriate we may ask for:

- Information relating to your health (for example if you have an allergy or have a disability so we can accommodate you)
- Your motivation for giving, including whether this relates to your personal experience with FIRST. We will never make this question mandatory, and only want to know the answer if you are comfortable telling us.

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Administer your donation or support your fundraising, including processing gift aid
- Keep a record of your relationship with us
- Share your story, if you consent. Some participants choose to tell us about their experiences with FIRST to help further our work. They may take on a role as an Ambassador, Mentor, or Volunteer and attend our events. This may include them sharing sensitive information related to their personal histories and family life in addition to their biographical and contact information. We may use some of the information provided, including gender, ethnicity or the educational background, to target opportunities to get involved. We will also monitor the types of people who are involved to ensure that the views we hear are representative of all groups. If we have the explicit and informed consent of the individuals (in addition to their parent or guardian (if they are under 18)), this information may be made public by us at events, in materials promoting our campaigning and fundraising work, as case studies, in documents such as our annual report or in accordance with reporting requirements of our funders such as the Department for Education.
- Manage your marketing preferences. With your consent, we will contact you to let you know about the progress we are making and to ask for financial and non-financial support. We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine. Just tell us so when you provide your data or contact us on [privacy@firsttechchallengeuk.org](mailto:privacy@firsttechchallengeuk.org).
- We do not sell or share personal details to third parties for the purposes of marketing. But, if we run an event in partnership with another named organisation your details may need to be shared. We will be very clear what will happen to your data when you register.
- Understand how we can improve our services, events or communications.
- We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you, including geo-demographic information and measures of affluence, when it is available from external sources to help us do this effectively. This helps us understand the background of the people who support us and helps us to make appropriate requests for gifts to supporters who may be able and willing to give more than they already do. We may also use your personal information to detect and reduce fraud and credit risk.
- If you enter your details onto one of our online forms, and you don't 'send' or 'submit' the form, we may contact you to see if we can help with any problems you may be experiencing with the form or our websites.

## 2.2. Young people's data

We collect and manage information from children and manage it in a way which is appropriate to the age of the child. Information is only collected to further our charitable provision – such as participant data to support programme delivery and event management, and data to help evaluate performance, impact and inform reporting.

Where possible and appropriate we will seek consent from both the child and parent or guardian before collecting information about children. Our events have specific rules about whether children can participate, and make sure advertising for those events is age appropriate.

## 3. The legal basis for processing your personal data:

We obtain individual consent to certain of our activities.

We process data that we need to process for the purposes of performing contractual obligations to data subjects.

We have a legitimate interest in processing personal data for marketing and other purposes connected with our business, which we do not consider is overridden by the interests or fundamental rights and freedoms of the data subject concerned.

## 4. Where we collect information about you from

We collect information in the following ways:

- **When you give it to us directly.** You may give us your information in order to sign up for one of our events, tell us your story, make a donation, purchase our product or communicate with us. Sometimes when you support us, your information is collected by an organisation working for us (e.g. professional fundraising agencies), but we are responsible for your data at all times.
- **When you give permission to other organisations to share it.** Depending on your settings or the privacy policies for social media and messaging services like Facebook, YouTube or Twitter, you might give us permission to access information from those accounts or services.
- **When we collect it as you use our websites or apps.** Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you're using to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

## 5. How we keep your data safe and who has access

We ensure that there are appropriate technical controls in place to protect your personal details; including passwords and access restrictions. Our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may, in exceptional circumstances, need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

## 6. Keeping your information up to date

We really appreciate it if you let us know if your contact details change. You can do that by contacting us at [privacy@firsttechchallengeuk.org](mailto:privacy@firsttechchallengeuk.org).

We will hold your personal data only for so long as it is necessary to provide you with the services you have requested or to perform the purpose for which it was originally collected, after which it will be deleted, unless it is necessary for us to continue to process it in order to comply with any legal obligations to which we are subject or for another legitimate and lawful purpose. Our retention policy is available upon request.

## 7. Your right to know what we know about you, make changes or ask us to stop using your data

You have the right to request from us access to and rectification or erasure of personal data or to restriction of processing concerning you or to object to our processing of the data as well as the right to data portability. If you want to access your information, please send a description of the information you want to see and proof of your identity by post to FIRST UK, 11 Upper Brook Street, London W1 6PB. We do not accept these requests by email. If you would like to stop us processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g. processing your donation or registering you for an event) we will do so. Contact us on [privacy@firsttechchallengeuk.org](mailto:privacy@firsttechchallengeuk.org) if you have any concerns.

If you have any questions please send these to [privacy@firsttechchallengeuk.org](mailto:privacy@firsttechchallengeuk.org), and for further information see the Information Commissioner's guidance [here](#). This is an external link. You have the right to complain to the Information Commissioner's Office about the manner in which or otherwise in respect of the manner in which we process your personal data.

Your provision of personal data to us may be a contractual or legal requirement. If you do not supply your personal data to us we may not be able to provide the services to you.

## **8. Changes to this policy**

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the FIRST Website or by contacting you directly.

Signed: .....

Date: .....

We are committed to reviewing our policies and good practice annually and/or when required by law.

<b>Date</b>	<b>Version</b>	<b>Policy Name</b>	<b>Approval Name</b>
31 <sup>st</sup> January 2019	V1 31-01-19	Website Privacy Notice	Chair of Trustees