

First Star Scholars UK

Privacy Notice - Clients

Date of Last Review	29/10/2024
Review Cycle	Annually
Date (Month/Year) of Next Review	10/2025
Date Policy was Ratified	29/10/2024
Named Lead for Writing/Review	Emily Hollis MBE
Signed:	Date
CEO	29/10/24
FSSUK Board of Trustees – Chair	
A.	

Introduction

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Post - 167-169 Great Portland Street, London, W1W 5PF

Telephone - 07933686271

Email - info@firststaruk.org

What information we collect and use, and why

We collect or use the following information for the operation of client accounts/contracts and guarantees:

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Racial or ethnic origin
- Genetic information
- Health information

We collect or use the following information for service updates or marketing purposes:

- Names and contact details
- Addresses
- Marketing preferences
- Records of consent, where appropriate

We collect or use the following information for research or archiving purposes:

- Names and contact details
- Addresses
- Personal information used for administration of research
- Personal information used for the purpose of research
- Records of consent, where appropriate

We also collect or use the following information for research or archiving purposes:

- Racial or ethnic origin
- Genetic information
- Health information

We collect or use the following information to comply with legal requirements:

- Name
- Contact information
- Identification documents
- Criminal offence data (including Disclosure Barring Service (DBS)
- Health and safety information

We also collect or use the following information to comply with legal requirements:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic information
- Health information
- Sexual orientation information

We collect or use the following information for recruitment purposes:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS)
- Security clearance details (eg basic checks and higher security clearance)

We also collect or use the following information for recruitment purposes:

- Racial or ethnic origin
- · Religious or philosophical beliefs
- Trade union membership
- Genetic information
- Health information
- Sexual orientation information

We collect or use the following information to measure the impact of services:

- Names and contact details
- Date of birth
- Health information (including dietary requirements, allergies and health conditions)
- Photographs or video recordings
- Recorded images, such as photos or videos
- Records of consent, where appropriate

We also collect or use the following information to measure impact of services:

- Racial or ethnic origin
- Genetic information
- Health information
- Sexual orientation information

Our lawful bases for collecting or using personal information are:

- Consent
- Contract
- Legal obligation
- Legitimate interest: Information is collected to measure support and impact on the care experienced community and make measured improvements to any impact.

Where we get personal information from

We collect your information from the following places:

- From people directly
- Partner contracts/agreements with consent

How long we keep information

Usually, we only retain 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.

In some cases we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. For example, because we are a charity that works with children and vulnerable adults we may need to keep information for longer (and in some cases indefinitely) to help us comply with our legal and safeguarding obligations.

Further information regarding retention and our retention schedule can be found in our Retention Policy.

Who we share information with

- Organisations we need to share information with for safeguarding reasons
- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Emergency services (where necessary)

Data processors

We outsource for the purpose of:

- Cloud based services
- Payroll
- IT
- Financial accounting
- HR

Use of cookies

The charity complies with cookie regulations by informing you about the use of cookies on our website and obtaining consent where necessary.

Our website is built using WordPress. Their cookie policy can be found here: <u>Cookie Policy | WordPress.org English (UK)</u>

We display a message regarding cookies / privacy on our website and also within this Privacy Notice.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal data.

<u>Your right to rectification</u> - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal data in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of

your personal data in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

<u>Your right to data portability</u> - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

<u>Your right to withdraw consent</u> – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information contact info@firststaruk.org

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Claim compensation for damages caused by a breach of the data protection regulations

If you want to exercise any of the above rights, please contact info@firststaruk.org

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact info@firststaruk.org. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern via info@firststaruk.org in the first instance.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Linked policies

Please also refer to our Data Protection Policy, Retention Policy and Appropriate Policy Document.

Version Control - Approval and Review

Version No.	Approved by	Approval Date	Main Change	Review Period
1.0	Diarmuid Molloy	29 October 2024	New policy format	Annually
			approved	