

Privacy Notice

This Privacy Notice explains how we intend to comply with the General Data Protection Regulation (GDPR) and is issued in the interests of transparency over how we use (or process) the Personal Data we collect. We also have specific <u>Terms of Conditions</u> for the use of our website, which you should read as well.

We value everyone who engages with us by whatever means, and we do all we can to fully protect your privacy and to make sure the personal data you provide us with is kept safe.

We treat all our supporters and contacts in line with our values and ethos and we welcome feedback; please use our contact details at the bottom of this article.

Moorlands College ("we", "us") is a charitable company registered at Companies House with company number 4241702 and registered with the Charity Commission for England and Wales with charity number 1092000. We are registered with the Information Commissioner's Office with registration number Z6065769.

Your Information

We collect personal information each time you deal with us, for example when you make a donation, request materials or information, sign up for an event, provide comments, complete surveys or otherwise provide your personal details.

We may hold some of the following data, depending on your relationship with us, that has been supplied by you or trusted third parties:

- Personal information, if you have supplied it, such as Name, date of birth, postal address, contact information.
- Event related information such as dietary or access requirements.
- Donation information, including gift aid status.
- Business details, such as job titles, employer or company names, and contact information.
- Communication preferences, such as how you receive our newsletter.

When you visit our website

We collect non-personal data such as IP addresses, details of pages visited and files downloaded. Website usage information is collected using cookies (see the section on Cookies below). If you provide us with any personal data while using our website we may use it to provide you with any information or services you have requested.

Information from social media

We may collect information that you make available on social media, for example, Twitter, Facebook and LinkedIn. You may wish to check their privacy policies to find out more about how they will process your data.



We collect information from third parties such as event organisers or fundraising sites where you have agreed to support us and have given your consent. You may wish to check their privacy policy to find out more information on how they process your data.

Other publicly available information

We may collect information from Companies House, Charity Commission and information published in articles, newspapers or blogs.

Sensitive Personal Data

Where you provide the information, we may collect Sensitive Personal Data, which may include your religious beliefs, or your physical or mental health.

Our legal basis for holding and processing your Personal Data

(formatting change - moved above following section *How we use your data*) We process and store information relating to current and prospective students, staff, alumni, donors and friends of Moorlands College.

We may contact you by post or telephone where we have a legitimate interest to do so. For example, where you have made a donation to us, we may send you information about the work your donation is making possible or other work we may wish to do. We will respond to your queries, and use your information to support and manage your relationship with us. Where you have previously asked us not to contact you we will respect your contact preferences. You can change your preferences at any time or stop us processing your data by contacting us by phone, post or email using the details given at the bottom of this document.

We may contact you by email, telephone or text if you have given us your consent to do so. We will only communicate in accordance with your preferences and you are free to change your preferences at any time by contacting us by telephone, post or email using the details given at the bottom of this document.

Where you provide personal data and sensitive personal data when applying for a job with us, such as the information on your CV, we will process, store and disclose the personal data we collect to:

- Support the recruitment process.
- Enable you to submit your CV or apply online for jobs.
- Answer any questions you may have.
- Provide anonymised data to monitor compliance with our equal opportunities policy.

How we use your data

Processing and use of your data will be done in compliance with any consent you have given us.

We may use the personal data that we collect to:



- Manage your interaction with Moorlands College.
- Aid your studies in line with any terms and conditions you have agreed to.
- Keep you up to date on news and stories about our work.
- Ask for financial and non-financial support, such as prayer.
- Process donations you give us, or support your fundraising for us, including Gift Aid.
- Provide information or resources you have requested.
- Provide personalised services, such as customised website content or personalised emails.
- Keep records of your relationship with us, for example questions you have asked or suggestions or complaints you have made.
- Classify supporters by location.
- Analyse publicly available information to aid our understanding of our supporters, understand the level of potential donations, and to help provide the right information at the right time to the right supporters.
- Conduct market research to aid our understanding of our supporters and their views.
- We may use trusted third parties for fundraising purposes.

If engaged with one of our courses or events, we may contact you with relevant information and changes in regard to any bookings or expressed interest.

How and where we store your information

We will keep your personal information in accordance with our legal basis and where appropriate to comply with terms and conditions we have agreed with you. We have a data retention policy to implement this.

We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned. For example, we will retain details of donations for 7 years to meet tax and accounting requirements, and we will not actively retain any safeguarding issues once they are resolved.

With regard to legacies, we may keep data you provide indefinitely to carry out the administration of legacies and to communicate with the families of those leaving us legacies.

If you have any questions about our Data Retention Policy please address these to our Privacy Officer, using the contact details at the bottom of this document.

How safe is the personal information we hold?

We ensure that we have appropriate technical controls in place to protect all the personal data you provide. For example, we ensure that any online forms are encrypted to ensure they can only be read by people permitted to do so. Our network is robustly protected from unauthorised access and is routinely monitored.



We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

We may make limited use from time to time of external companies to collect or process personal data on our behalf. If and when we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear, and carry out periodic reviews. If and when we do use external companies, we remain responsible for the storing and processing of your personal data.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

Credit / debit card security

We may use a third party to process donations or purchases using cards but will ask them to process your information in line with the GDPR and the Payment Card Industry Data Standard.

If you use your debit or credit to donate to us or pay for something, whether online, over the phone or by mail, we will process your information securely in accordance with the Payment Card Industry Standard.

We do not store your debit or credit card details once your transaction has completed. All card details are securely destroyed once your donation or payment has completed. We may hold bank account details for the purpose of making payments, or collecting direct debits in accordance with direct debit mandate rules.

Where we store your personal information

We use a combination of local servers and cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. For our Local servers, both physical protection and Firewall protection is utilised. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information.

Sensitive information, such as application and placement information, is held in a locked and secured office and only appropriate members of staff have access to these areas. The staff team are encouraged to operate a clear desk policy when dealing with your sensitive information in order to prevent an accidental breach of your information.

When we share your information

We do not share or swap your information with any other charities.

Legal duty



We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by HMRC, or if asked for details by a law enforcement agency.

Our service providers and third parties

Occasionally we may employ agents to carry out tasks on our behalf, such as fulfilling orders, organising events or processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

Cookies

We collect data using cookies. A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website, for example, traffic data, location data, device information, the date and time of your visit and the pages that you visit. The use of cookies is an industry standard for most major websites. You can find more information about cookies by following this link.

To enjoy our website to the full, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the sites.

The cookie data that we collect we may use to:

- Customise the content on our website and to help to understand visitor's current and future needs.
- Process any requests, applications or transactions you may make.
- Aid internal administration and analysis.

Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.

Third party cookies

We use websites such as YouTube and Vimeo to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third party website for more information about their cookies and how to manage them.

We also use third party suppliers such as Facebook, Twitter, and Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts. As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK



courts. If you are concerned about this you can change your cookie settings or you can find out more about this from the Information Commissioner's Office at ico.org.uk COLLEGI

Children and vulnerable people

We do not actively seek to collect children's data. If at any time we create any materials which may lead to someone aged under 16 years providing their details, we will make it clear that we will need their parent's/guardian's permission before giving us their personal information.

In the event that we knowingly collect data of vulnerable persons we carry out a risk assessment to ensure the appropriate actions are taken.

Your rights and telling us when things change

We fully recognise your right to have your data removed, to be forgotten, to opt out of communications or withdraw consent and to have a copy of your personal data. You also have the right to lodge a complaint with the Information Commissioner's Office at ico.org.uk

Preferences

You can change your preferences at any time about what you receive from us, including marketing and fundraising materials, or how we contact you, by mail, phone or email. Please let us know, using the contact details at the bottom of this document.

Updating your details

We do appreciate it if you keep your details up to date. You can do so in the same way as updating your preferences above.

Telling us to stop processing

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by using the contact details at the bottom of this document.

We may use Royal Mail's Postcode Address File or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form.

We will not use these sources to create data that you have chosen not to provide, for example, if you have left a telephone number blank; nor will we automatically update changes of address, we will normally only update your address when you tell us it has changed. However, if you are a regular giver, continuing to give regularly, and items such as newsletters are returned to us, we may use external sources to update your address details so that we may let you know how your money has been spent.

If you engage with study at Moorlands College, or on one of our partner courses, your data will be held in accordance with terms and conditions agreed with upon accepting a place on the course.

EST. 1948

Access to your information

You have the right to request details of the information we hold about you. To receive a copy of the personal information we hold please write to our Privacy Officer at the address given below. We will respond within one month of receiving your letter.

You can find out more about your rights on the Information Commissioner's Office website at ico.org.uk/for-the-public/personal-information/

Changes to our privacy and security policy

This policy was last updated in May 2019. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy we will show this clearly on our website, in our publications or by writing to you directly. By continuing to use our website you will be deemed to have accepted these changes.

Contact Us

We welcome feedback or questions on this policy or on any of our actions. If you would like to discuss any of the above, or have any wider enquiries please use the details below;

Call us on: 01425 674500

Email us on: enquiries@moorlands.ac.uk

Write to us at: Moorlands College, Sopley, Christchurch, Dorset, BH23 7AT