

Next Steps South West: Website Privacy Policy.

Next Steps South West is a collaborative project run by the University of Plymouth which respects your privacy and is committed to protecting your personal data. Next Steps South West is a collaborative partnership between fourteen higher education providers in South West England. You can see a full list of our partners here.

The project works closely with schools and colleges in the region to identify and support students in years 9-13 from disadvantaged areas. The programme is supported and funded by the Office for Students.

This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or engage with us and tells you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

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Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how the University of Plymouth collects and processes your personal data through your use of this website, including any data you may provide through this website, for example, when you sign up to our newsletter or book an event.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Information on all our privacy policies can be found at: <https://nextstepsw.ac.uk/your-privacy-matters/>

Controller

The University is the controller of the website and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy policy). It is registered with the Information Commissioner’s Office under registration number Z7546246

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: University of Plymouth Email address: dpo@plymouth.ac.uk

Postal address: **Drake Circus, Plymouth, PL8 4AA.**

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in September 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, title, date of birth and gender.
- Contact Data includes postcode, email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes bookings made by you, your interests, preferences, feedback, and survey responses.
- Usage Data includes information about how you use our website, products, and services.

- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We generally do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However, we may collect and process such data with your specific consent in relation to an event you are attending (for example any allergies, other dietary requirements, or adjustments you may require).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when:

participating in the project and attending our events

subscribe to our service or publications

request updates to be sent to you

enter a competition, promotion, or survey or

give us feedback or contact us

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Cookies

Cookies are small text files that get stored on your computer's hard drive. They enable our site to remember information, but do not store personal information that could lead to your identification without your permission.

Some cookies are required in order for the site to function correctly, others are optional. We use the following **cookies**:

- **Strictly necessary cookies.** These are **cookies** that are required for the operation of our website. They include, for example, **cookies** that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These **cookies** record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

You can find more information about the individual **cookies** we use and the purposes for which we use them in the table below:

Name	Provider	Domain	Purpose
_ga	Google Analytics	.nextstepsw.ac.uk	Registers unique ID that is used to generate statistical data on how the visitor uses the website.
_gid	Google Analytics	.nextstepsw.ac.uk	Registers unique ID that is used to generate statistical on how the visitor uses the website
_gat	Google Analytics	.nextstepsw.ac.uk	Used by Google Analytics to throttle request rate.
cookieconsent_status	Next Steps South West	.nextstepsw.ac.uk	Remembers the cookie notice was dismissed so doesn't show again.

You can learn more about cookies including how to control and disable them [HERE](#).

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below

Technical Data from the following parties:

- (a) analytics providers [such as Google based outside the EU]

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is in our public task to do so
- Where we need to perform the contract, we are about to enter into or have entered into with you

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal obligation
- Your explicit consent

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal grounds, we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To process and arrange for your attendance at events	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications (e) Health or disability information	(a) Performance of a contract with you (b) Necessary for our legitimate interests Special category data (a) Explicit consent
To manage our relationship with you, which will include: (a) notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take part in a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (d) Public task
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We use a third-party service provider named Mailchimp (The Rocket Science Group, LLC) to process and subsequently store personal data, for the purpose of sending email newsletters. We will only add you to our EMS (email marketing service) mailing lists with your explicit permission. Any handover of personal data is voluntary and can only be imported once confirmed via a double opt-in email.

Under the lawful basis of 'legitimate interest' Article 6(1)(f) we may sometimes manually subscribe contacts to our Schools & Colleges Newsletter, provided there is a relevant and appropriate relationship between the reader and NSSW, for instance if you are an event organiser at one of our target schools.

To read how Mailchimp uses your personal data please refer to their [privacy policy](#).

If you wish to stop receiving updates and marketing from us, please use the opt-out link at the foot of the update email or contact us at nextsteps@plymouth.ac.uk

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with our collaborative partners and service providers for the purposes set out in the table above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting, or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

As a data subject you have a number of rights in relation to your personal data. You can:

- access and obtain a copy of your data on request
- require the University to amend incorrect or incomplete data
- require the University to stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where the University is relying on its legitimate interests as the legal ground for processing
- require us to erase your personal data
- require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.

Please note that the above rights are not absolute, and the University may be entitled to refuse requests where exceptions apply.

If you wish to exercise any of these rights or if you have a complaint about the way you believe your data is being processed, in the first instance, please email: dpo@plymouth.ac.uk

If you have a complaint and you remain dissatisfied with how your complaint has been dealt with you can take your complaint to the Information Commissioner's Office (ICO) for a review. They can be contacted at casework@ico.org.uk