Data Protection, Privacy and Cookies Policy

At the Campaign for Learning (referred to in this document as ‘The Campaign’) we are committed to maintaining the trust and confidence of our visitors to our website and to our office. Here you’ll find information on how we treat data we collect from when someone purchases a product, books onto an event, subscribes to our newsletter or visits our website.

The Campaign is required to maintain certain personal data about living individuals for the purposes of satisfying operational and legal obligations. The Campaign recognises the importance of the correct and lawful treatment of personal data; it maintains confidence in the organisation and provides for successful operations.

The types of personal data the Campaign for Learning may require includes information about suppliers and others with whom it communicates. The personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 2018 (DPA 2018). The DPA 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR) and controls how your personal information is used by organisations, businesses or the government.

Employees and any others who obtain, handle, process, transport and store personal data for the Campaign for Learning must follow the strict rules called ‘data protection principles’. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

1.0 Data we collect

1.1 Personal information

We may collect, store and use the following kinds of personal information:

- information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, timing, frequency and pattern of service use)
- information that you provide to us when using our website to register, join as a member, subscribing to our emails, purchasing services or products, making a donation, posting to our website for publication on the internet and any other personal information that you choose to send to us (including but not limited to your name, address data, email, job title, purchase order reference, contact number and any other booking details)
- for the employment and management of our staff. This information includes (but is not limited to) their name, address, date of birth, next of kin and emergency contact details, previous employment, qualifications, salary information, bank and pension details, relevant medical history and any individual needs including those relating to disability. Some data is collected directly from prospective or newly appointed staff. Other personal data is collected from third parties. We will only seek information from third parties with the applicant’s consent.

Financial transactions are handled through our payment services provider, Stripe and dealt with by a third party financial provider. You can review the provider’s privacy policies via the following URLs https://stripe.com/gb/privacy. We will share information with our payment services provider only to the
extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds. Payments

Before you disclose to us the personal information of another person, you must obtain that person’s consent to both the disclosure and the processing of that personal information in accordance with this policy.

1.2 Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

1.3 Cookies that we and our service providers use

<table>
<thead>
<tr>
<th>Cookie Name</th>
<th>Used By</th>
<th>Life Span</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>sVSession</td>
<td>Wix</td>
<td>Permanent</td>
<td>Creates activities and BI</td>
</tr>
<tr>
<td>hs</td>
<td>Wix</td>
<td>Session</td>
<td>Security</td>
</tr>
<tr>
<td>Incap_ses_${Proxy-ID}_${Site-ID}</td>
<td>Wix</td>
<td>Session</td>
<td>Security</td>
</tr>
<tr>
<td>Incap_visid_${Proxy-ID}_${Site-ID}</td>
<td>Wix</td>
<td>Session</td>
<td>Security</td>
</tr>
<tr>
<td>Nibi_(ID)</td>
<td>Wix</td>
<td>Persistent cookie</td>
<td>Security</td>
</tr>
<tr>
<td>XSRF-TOKEN</td>
<td>Wix</td>
<td>Persistent cookie</td>
<td>Security</td>
</tr>
<tr>
<td>smSession</td>
<td>Wix</td>
<td>Two weeks</td>
<td>Identify logged in site members</td>
</tr>
<tr>
<td>Cookie Name</td>
<td>Source</td>
<td>Expiry</td>
<td>Description</td>
</tr>
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</tr>
<tr>
<td>__utma</td>
<td>Google Analytics</td>
<td>2 years from set/update</td>
<td>Stores the amount of visits of a user, the time of their first visit, the previous visit, and the current visit. It does not contain any personal information and is used only for analytical purposes.</td>
</tr>
<tr>
<td>__utmz</td>
<td>Google Analytics</td>
<td>6 months from set/update</td>
<td>This performance cookie stores where a user came from (eg. search engine, search keyword, link).</td>
</tr>
<tr>
<td>_ga and _gid</td>
<td>Google Analytics</td>
<td>2 years and 2 hours</td>
<td>Used to distinguish between website users in Google Analytics</td>
</tr>
<tr>
<td>_gat_UA-62115691-1</td>
<td>Google Analytics</td>
<td>1 minute</td>
<td>Used to moderate calls to the Google Analytics service.</td>
</tr>
<tr>
<td>RITCookie</td>
<td>Website</td>
<td>365 days</td>
<td>Stores whether the user has accepted the cookie message or not.</td>
</tr>
<tr>
<td>ASP.NET_SessionId</td>
<td>Website</td>
<td>End of session</td>
<td>Used for authenticating a user's session after logging in. Closes when you exit the browser.</td>
</tr>
<tr>
<td>ARRAffinity</td>
<td>Website</td>
<td>End of session</td>
<td>Tells our infrastructure which server to handle the request.</td>
</tr>
<tr>
<td>MemberLoggedIn</td>
<td>Website</td>
<td>End of session</td>
<td>A binary flag which stores whether a user is logged in or not.</td>
</tr>
<tr>
<td>ai_session and ai_user</td>
<td>Website</td>
<td>1 day</td>
<td>Tracks users as they navigate the website predominantly for infrastructure performance insights.</td>
</tr>
</tbody>
</table>

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Website, Mobile Apps and Campaign for Learning Social Media.

1.4 Google Analytics

When someone visits www.campaign-for-learning.org.uk, www.learningatworkweek.com or www.familylearningfestival.com we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: https://www.google.com/policies/privacy/.

1.5 Guest Wi-fi
When you visit the Campaign for Learning office in London you may choose to use the free wi-fi on our premises. Initiatives for Change who own the router do not collect any data from your usage.

2.0 Using Personal Information

As part of the registration process for our e-newsletters, event bookings, and product purchases we collect personal information. We may also collect information from you if you choose to participate in one of our research projects.

We use that information for the following reasons: to tell you about things you have indicated you are interested in; to provide products or services; to contact you if we need to obtain or provide additional information; to collect payments from you; to check our records are right and to check every now and then that you’re happy and satisfied; to personalise our website for you; provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information).

We also collect information about prospective and appointed staff to cover our statutory, management and contractual responsibilities.

We don’t rent or trade email lists with other organisations and businesses. We will not share your email address with a third party unless your consent has been given.

We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter and communications. For more information, please see MailChimp’s privacy notice. You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing us at info@cflearning.org.uk

3.0 Storing your personal information

Your information will be stored in our company file storage system Google drive, CRM system, accounts system SAGE and our 3rd party credit card transaction STRIPE. We also store hard copy information on site and in secure storage facilities.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our, and where applicable our supplier’s, secure (password- and firewall-protected) servers. This may include data storage services provided in the Cloud.

All electronic financial transactions entered into through our website will be protected by encryption technology. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

4.0 Sharing information

Occasionally the Campaign for Learning works in partnership with other organisations on activities such as events or research. We will share with our partners the information you provide for the purpose of fulfilling the needs of the event, research or activity. However, we will not share your contact details e.g. email, with our partners unless you give explicit permission for us to do so.

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers (including specifically the provider and host of our website or other subcontractors) insofar as reasonably necessary for the purposes set out in this policy.
Please be assured that we do not share your personal details with any other company without your consent or if required to for legal or insurance reasons.

5.0 Access to your personal information

You are entitled to view, amend, or delete the personal information that we hold. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. In addition, if you signed up via the www.campaign-for-learning.org.uk, you can access your profile data and adjust your privacy settings by visiting https://www.campaign-for-learning.org.uk/my-details when logged into the website.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

The Campaign for Learning aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt unless there is a good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request. Email your request to our data protection officer Julia Wright at info@cflearning.org.uk

6.0 Retention of data

The Campaign for Learning will keep most information for seven years. This excludes some project data which will be kept for 10 years and staff records which will be kept for six years.

7.0 Third party websites

Our website includes hyperlinks to, and details of, third party websites. This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

We operate a number of social media pages. Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

8.0 PERSONAL DATA OF CHILDREN

Our website and services are targeted at persons over the age of 18. The Campaign does not routinely collect or store children and young people’s personal data. The only exception to this is where there is a requirement to collect data of children and young people for research and evaluation purposes. In these circumstances, the following policy will be implemented:

- We will always clearly explain in writing why we are collecting and we will only use the data for that purpose
- We will always obtain written parental consent before we collect data from children and young people who are under the age of 16
- We will always keep the data that we hold secure so that it cannot be lost, misused or disclosed
• We will never share data with a third party without written consent
• We will only keep data for as long as is necessary for the research and evaluation process and we will then destroy it.
• We will comply with all applicable laws concerning data protection of personal information.

9.0 Notification under the Data Protection Act

Normally, organisations holding confidential data have to notify or register with the Information Commissioner (IC); however the Campaign for Learning’s use of personal information falls into at least two exemptions listed by the IC. The Campaign for Learning will monitor changes in business use of personal information, and notify the IC if appropriate.

10.0 Our Details

This website is operated by Campaign for Learning. We are a charity registered in England and Wales Charity no. 1064113 and a company limited by guarantee Company no. 03380789. Our registered office is at Campaign for Learning, 24 Greencoat Place, London SW1P 1RD.

You can contact us:

• by post, using the postal address given above
• using our website contact form
• by telephone, on the contact number 020 7798 6067
• by email at info@cflearning.org.uk

This privacy notice was last reviewed on 1 May 2019 and will be next reviewed 1 May 2020.