



# Privacy Policy

March 2019

## Privacy Policy

### **1. Introduction**

1.1 City Lit is committed to protecting your personal information when you use our services. This Privacy Policy relates to us using any personal information that we collect from you via the following online services:

- any City Lit website that links to this Privacy Policy
- social media or official City Lit content on other websites

It also relates to us using any personal information that you provide by phone, SMS, email, in letters and other correspondence, and in person.

This Privacy Policy provides a widely drafted privacy notice to allow data to be processed under a number of grounds and for a number of purposes.

1.2 This Privacy Policy explains the following:

- who we are
- what information we may collect about you
- how we will use information we collect about you
- how long we hold information about you
- the legal basis for processing your information
- when we may use your details to contact you
- whether we will disclose your details to anyone else
- your rights regarding the personal information you provide to us
- How to contact us or lodge a complaint to the Information Commissioners Office

1.3 City Lit is committed to safeguarding your personal information. Whenever you provide such information, we are obliged to use it in line with applicable laws concerning the protection of personal information (these laws are referred to collectively in this Privacy Policy as the "data protection laws"). City Lit websites contain hyperlinks to websites owned and operated by third parties beyond the control of City Lit. These third party websites will have their own privacy policies which you should read if you have concerns.

## **2. About us?**

2.1 During this policy and online when saying “we”, “our” or “City Lit”, we are referring to The City Literary Institute

Registered office: City Lit, 1-10 Keeley Street, Covent Garden, London, WC2B 4BA.

Registered charity: 803007

Registered in England no: 2471686

The Data Controller is The City Literary Institute and our registration number in the Data Protection Register is Z4963477.

## **3. What Information will City Lit collect about me?**

3.1 We will collect your personal information when you:

- access, participate in or sign up to any of our services, activities or online content
- apply or enrol for one of our courses,
- create an account on our website,
- phone or email us,
- donate money to City Lit,
- reserve a place at an event,

3.2 We may collect sensitive personal information from you such as ethnic origin, health, religious beliefs or sexual orientation (e.g. if you are applying to join one of our courses or applying for a job at City Lit). This type of sensitive personal information is also known as ‘special categories of personal data’. The processing of these categories is only permitted in certain situations such as providing health and social care during your studies. We are also required to report this information to our funding providers (see **section 9**). In these circumstances, we will explain further why we are collecting this information and how we will use it and obtain your explicit consent.

3.3 What types of personal data do we collect?

- name, ethnic origin, gender preference and date of birth
- contact details including postal address, email and phone
- your communication preferences
- household situation
- employment information,
- prior education level,
- household status & residency status
- state benefits where relevant
- disability/learning difficulty information, and support information where relevant
- records of academic assessment and outcomes

3.4 City Lit collects information about how you use its website and other City Lit online content, and the device(s) you use to access these services. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the web. For more information, please see our [Cookie Policy](#).

#### **4. How will City Lit use the personal Information it collects about me?**

4.1 By providing City Lit with your personal information it will be stored, and may be used by us for any of the following purposes:

- To register you on to one of our courses and give you access to the course materials.
- To comply with funding and audit requirements for the Education and Skills Funding Agency (ESFA)
- To provide you with information about our courses; application tips; funding advice; and other information that may be relevant to your interests.
- For the direct marketing of City Lit products and services
- To provide you with invitations to relevant events and reminders or joining details for those events to which you register.
- To issue directed funding appeals and verify large donations
- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our students/customers.
- To provide postal communications.
- To determine the effectiveness of promotional campaigns and advertising.
- To better understand how people interact with our websites.
- To enhance the security of our network and information systems.
- To identify and prevent fraud.

4.2 We will ask for consent to send you marketing communications about our products and services. You'll be able to unsubscribe from these communications at any point or alternatively via the 'unsubscribe' option at the bottom of each email we send you. See **section 7** for more details.

4.3 Whenever processing data for the purposes described above, we will comply with the spirit and the letter of the law in respecting your rights and interests. You have the right to object to marketing. See **section 11** for more details.

#### **5. How long will City Lit retain my personal data?**

5.1 We will hold and process your personal information on our systems only for the purpose for which the data was originally collected unless we have notified you differently, or as long as is set out in any relevant contract you hold with City Lit. If you enrol on a course with City Lit we will retain your personal information for 12 years in line with our responsibilities to record and report on this information for the Education and Skills Funding Agency (ESFA).

## **6. Legal basis for processing your information**

6.1 Data Protection law requires us to list the legal basis by which we process personal data. There are six categories available:

<b>Legal basis</b>	<b>Example</b>
(a) Consent	To obtain permission to take photographs at a City Lit event or receive direct marketing
(b) Performance of a Contract	To fulfill the specific obligations of a contractual agreement e.g. communications about your attendance at an event
(c) Compliance with a legal obligation	To supply details to ESFA the funding body for City Lit
(d) To protect the vital interests of the data subject	The processing is necessary to protect someone's life e.g. share health information
(e) Public interest task	This is probably the main basis for our processing of your personal data as a provider of educational services
(f) Legitimate interests of the organisation	This is a broad category which incorporates diverse activities such as business planning, fraud prevention and IT Network Security

6.2 Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

6.3 If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not.

## **7. Will I be contacted for marketing purposes?**

7.1 We offer regular emails to let you know about our courses, events and news as well as any alerts relating to courses you have booked or shown an interest in. We may also invite you to take part in surveys about our products and services or issues affecting City Lit, some of which we are legally required to do.

City Lit may personalise the message content based on any information you provide to us and your use of our platforms.

You can update your communications preferences and stop receiving future emails at any time by following the links located at the bottom of our emails. Requests submitted in this manner are processed and effective immediately.

7.2 If you believe you have received unwanted, unsolicited emails sent by or purporting to be from City Lit, please forward a copy of that email with your comments to [data.protectionofficer@citylit.ac.uk](mailto:data.protectionofficer@citylit.ac.uk) for review.

7.3 Occasionally, we may contract a third party to communicate on our behalf. We do not collect your email address or contact information from this third party, and we do not have access to their mailing list.

Depending on the nature of the third-party mailing, we may, in order to comply with applicable laws, provide the third party with a suppression list of our contacts to exclude from their list. The third party does not have permission to keep or market to our contacts on this list, or to use it in any way other than as a suppression list for a mailing they are providing on our behalf.

7.4 We may contact you via post to let you know about our courses, events and news. City Lit may personalise the message content based on any information you provide to us. You will only be contacted by post if your marketing preferences state you are happy for us to do so.

7.5 City Lit may contact you by phone, either by a call or by SMS, to keep you updated about courses you have shown an interest in or asked to receive alerts for (e.g. using our waiting lists functions). We will only contact you this way if stated in your marketing preferences.

## **8. Profiling, research and Wealth screening**

8.1 Your data is assessed to ensure we send you relevant communications and information. We do this by reviewing the events and activities you have attended or shown interest in. We may tailor the content, the amount of information we send and which channels we use to best suit your needs. This profiling also helps us to understand the collective interests, expectations and trends of our community, feeding in to our future planning for activities and fund raising appeals. We do not make decisions based solely on automated processing of your data.

There are no current plans to carry out external wealth screening projects.

## **9. Will City Lit share my personal information with anyone else?**

9.1 As City Lit receives government funding it is legally required to share student personal data collected when you enrol on a course to government agencies. These agencies are:

- Education & Skills Funding Agency
- European Social Fund
- Greater London Authority

9.2 Your information may also be shared with our educational partners where necessary to provide you with a service you have requested. This would happen when, for example, you have requested to enrol on an accredited course where an external awarding body is involved. When doing this, we will provide you with further information at the time of first collecting your information.

9.3 City Lit sometimes uses third parties to process and store your information on our behalf, for example to provide services or analysis. We require these third parties to comply with our

instructions and that they do not use your personal information for their own business purposes, unless you have explicitly consented to them using your personal information in this way.

9.4 Although most of the information we store and process stays within the UK, some data may be transferred to other countries. Transfers to countries within the EU are permitted because every EU country is subject to the requirements under GDPR. If data is transferred outside of the European Economic Area (EEA) the recipient organisation must ensure an adequate level of protection for your rights and freedoms.

## **10. How will City Lit protect my personal data?**

10.1 We have implemented appropriate safeguards to ensure your data is protected. Examples of how we protect your personal data include the following:

- Restricted access rights to I.T. systems, with processes in place to grant and revoke these rights;
- Firewalls and virus protection in place which are monitored and updated on a systematic basis;
- Physical security measures such as door access control systems, on-site security and surveillance monitoring systems;
- Use of secure off-site data centre with a high level of physical security and back-up procedures in place to protect data;
- Business continuity and disaster recovery procedures in place.

## **11. What are my rights?**

11.1 You have the following rights subject to a number of qualifying conditions which are partly linked to our legal basis for processing your data:

### **Right of access:**

You have the right to request a copy of the personal information we hold about you, except where releasing that information would breach another person's privacy or where an exemption to data protection laws applies.

You may request that City Lit disclose details of data which it holds about you and the purpose for which such data is held. A 'Subject Access Request Form' will be supplied upon request. Additionally we may need documentation such as a copy of your passport or driver's licence to verify identity.

### **Right of rectification:**

You have the right to ask us to update or amend the information we hold about you if it is incorrect.

### **Right of erasure:**

You have the right to ask us to remove your personal information from our records.

**Right to restrict processing:**

You have the right to ask us to stop or limit processing of your personal data. When processing is stopped, we are permitted to store the personal data but not to further process it.

**Right to data portability:**

You have the right to ask us to provide you with a copy of your personal data in a machine readable format provided that the processing is based on your consent and it is carried out by automated means (i.e. not paper files).

You also have the right to ask us to transmit the data to another controller.

**Right to Object:**

You have a right to object to the processing of your personal data including the right to object to direct marketing. You can also withdraw your consent at any time.

**Who to contact to exercise your rights**

Please address requests and questions about your rights to the Data Protection Officer, City Lit, 1-10 Keeley Street, Covent Garden, London, WC2B 4BA, or email: [data.protectionofficer@citylit.ac.uk](mailto:data.protectionofficer@citylit.ac.uk)

**Right to make a complaint to the supervisory authority:**

You have the right to make a complaint to the Information Commissioner's Office (ICO):

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Tel: +44 (0)303 123 1113 (local rate)

Web: <https://ico.org.uk/make-a-complaint/>



## **12. Updates to this privacy policy**

12.1 We may update or amend this Privacy Policy from time to time, to comply with the law or to meet our changing business requirements. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access our Website you are agreeing to these updates and amendments.

## **13. Contacting City Lit**

13.1 If you have any questions or comments about this Privacy Policy, please contact:

Data Protection Officer, City Lit, 1-10 Keeley Street, Covent Garden, London, WC2B 4BA,

email: [data.protectionofficer@citylit.ac.uk](mailto:data.protectionofficer@citylit.ac.uk)

<b>Executive Owner</b>	Chief Finance Officer
<b>Policy Owner</b>	Data Protection Officer
<b>Approval Body</b>	Governing Body
<b>Date Approved</b>	5/3/2019
<b>Review Period</b>	Annual
<b>Next Scheduled Review Data</b>	One year from date approved

### **Version tracking**

<b>Versions</b>	<b>Date</b>	<b>Author</b>	<b>Reason for changes</b>
1.1	18/11/18	Graham Jennings	New
1.2	9/1/19	Graham Jennings	New branding added
1.3	13/2/19	Graham Jennings	Minor text corrections
1.4	24/4/19	Graham Jennings	Minor text corrections