



Data Protection and Electronic Marketing Privacy Policy (September 2019)

1. Introduction

This policy covers data protection, electronic marketing, and the retention of information within the administration of the Sussex School of Practical Philosophy (the Branch), a branch of the School of Philosophy and Economic Science (the School).

The Branch's policy is to adhere to the Data Protection Act 2018 (incorporating the requirements of the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003, and such other legislation as may be applicable.

The School also aspires to follow best practice in so far as it relates to its activities.

2. Data Protection

The Branch holds information about:

- enrolled students; and
- members of the public who (1) attend events undertaken or arranged by the Branch; or (2) express an interest in the Branch's activities; or (3) visit the Branch's website; or (4) otherwise wish to receive materials published or distributed by the Branch.

Hereinafter, the following terms have the following meanings:

- "we" and "us" means the Branch;
- "you" and "your" means or applies to enrolled students and members of the public who have contacted the Branch in the manner listed above;

This policy sets out the way we collect and process your personal data and we have created this privacy policy to make sure you are aware of how we use your data.

3. How we collect your information

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you enrol on a course or at an event or when you make enquiries through our website, when you register your interest on our website, or you are the recipient of communication in various other ways (for example, where you alert us to a change in your contact details).

- From someone else who has enrolled you on a course or signed you up to an event on your behalf or (for example a family member, or a fellow student who has provided us with your contact details for that purpose).
- From a third party organisation in specific circumstances such as our bank if you pay your fees by BACS.

We will not store or capture personal data through our website(s) without your prior knowledge and consent. Where personal information is so captured it will be used for the purposes set out in this policy.

When collecting data generally we will endeavour, whether by reference to this policy or otherwise, to ensure that you:

- understand why the information is needed, what it will be used for and what the consequences are in the event you decide not to give consent to processing;
- so far as reasonably practicable, grant specific consent, either written or verbal for data to be processed; and
- have received sufficient information on why your data is needed and how it will be used.

4. The types of information we collect

We may collect the following types of personal data about you:

- Contact and communications information, including your contact details (including name, address, email address, phone numbers) and records of communications and interactions we have had with you);
- Demographic information, such as postcode, preferences and interests;
- Website usage data;
- Other information relevant to course enquiries;
- Certain other information, which you volunteer when participating as a student in our activities (for example, when attending courses, or events or in volunteering to assist in the operations of the School).

We may also collect data about your health or medical conditions, where you have volunteered this, for example so that we can cater for you when you attend a course or event or act as a volunteer for and on our behalf.

This is held electronically by the Branch's administrator familiar with the rights and obligations surrounding your data.

Mailing groups are used for communications with students, and subscribers for events, activities, notifications and publications.

Emergency Contact data is held by the Lead Tutor or administrator of a residential course for the duration of the course and may be used for emergency contact purposes.

5. How we use personal data

Unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose, personal data provided to us will be used for the purposes set out at the time of collection (which may consist of those purposes set out in this policy) and, where relevant, in accordance with any preferences you express.

If you require any information as to how processing for the new purpose is compatible with the original purpose, please contact Branch Leader, at info@practicalphilosophysussex.com.

We will only use your personal data where the law allows. In general terms, save as set out elsewhere in this policy:

- personal data we hold is used for the purposes of administering or improving courses or events or other activities and publications; and
- your details will not be passed to any other organisation for any purpose.

If we are so permitted, you may receive from us details of activities run by or in conjunction with other organisations by post or email. You are free to opt out of receiving such communications from us at any time.

Where we have your consent and / or (if within the law) where this is necessary for our legitimate interests (or the legitimate interests of a third party), as applicable, we use your personal data for the following purposes:

- in the administration of courses, events, and activities including:
 - general notifications to you about them; and
 - receiving payment of course fees and other charges;
- research and statistical analysis about the courses or events or activities we offer;
- communication about our activities or events and activities outside of the School and its branches that we think may be of interest to you;
- storing your details on the software platform we use for our database. Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Policy published on that site.

Please note that we may also use your data and share it with others where it is necessary:

- for us to comply with a legal obligation to which we are subject;
- to protect the vital interests of the data subject or of another natural person.

Personal data collected and processed by us may be shared, where necessary, with:

- our volunteers, for the purposes of administering courses, events, publications and activities organised by or in conjunction with us and giving you access to the benefits to which you are entitled.
- our contractors, professional advisors, auditors or suppliers, including those providing IT services or data management services.

Some of the events and courses we offer, such as residential courses, are organised and / or administered by the School through its administrative office at Mandeville Place, London. Data provided by you relevant to your attendance at such events and courses may be forwarded to the School for the purposes of such events / courses and will be held by the School subject its own School's data protection and privacy policy available at its website at www.schoolofphilosophy.org.

Statistical information may be shared with the School for administrative purposes, but this will not include personal information.

We do not sell your personal data to/with other organisations to use and, save as set out above, do not otherwise share it with other organisations.

6. Your marketing preferences

We will always respect your wishes in respect of what type of communications you wish to receive from us and how you wish to receive them. We wish to gain your prior consent to mailings. However, there are some communications that we may need to send you without your specific prior consent, for example, in order for us to fulfil our contractual obligations to you. Examples of these essential service communications are:

- Mailings directly concerning your participation on a course or at an event, notices of formal meetings, and notification about similar or related courses or events similar to one who are attending or have recently attended.
- Records of transactions, such as payment receipts or Direct Debit confirmations, booking confirmations (as applicable).

7. Controlling information about you

a. For Students of the Branch

When you enrol for any of our courses you will see a tick box allowing you to opt-in to receive marketing communications from us by email. This authorisation will automatically lapse at the start of the next term unless you renew it on the enrolment form for the new term.

If during the term you change your mind and no longer wish to receive marketing communications then you can let us know by one of these methods:

- Reply to any email that you receive with “unsubscribe” in the Subject field.
- Send an email to info@practicalphilosophysussex.com
- Inform your tutor.

If you do opt-out of marketing communications but are enrolled on one of our courses, we will still contact you with relevant, non-marketing information pertaining to the course or event for which you have enrolled.

Once you cease being a student of the Branch you may still continue to receive marketing communications by registering your interest and opting-in to receiving information from the Branch on our website at www.practicalphilosophysussex.com.

b. For Others Interested in the Branch

When you register your interest on our website, you will see a tick box allowing you to opt-in to receive marketing communications from us by email.

You are in control of how we communicate with you. You can update your choices and/or your contact details on-line at your leisure. If you have agreed that we can use your information for marketing purposes, you can change your mind and inform us via one of these methods:

- Reply to any email that you receive with “unsubscribe” in the Subject field.
- Send an email to info@practicalphilosophysussex.com

8. Security

We will always hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards.

We also follow stringent procedures to ensure we work with all personal data in line with the General Data Protection Regulation (GDPR).

9. Links from our sites

Our websites may contain links to other websites.

Please note that we have no control of websites outside of the Branch website.

The School website, www.schoolofphilosophy.org, and websites of other branches, adhere to similar data protection and privacy policies as those detailed in this policy. Links to their data protection and privacy policies are included on their websites.

If you provide information to a website to which we link, we are not responsible for its protection and privacy.

Always be wary when submitting data to websites. Read the sites’ data protection and privacy policies fully.

10. How long your information is kept

We keep your personal data only for as long as necessary for each purpose we use it. You can voluntarily unsubscribe from mailing groups at any time.

Financial records must be retained for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

11. Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

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

12. Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your legal rights, you may contact, in the first instance, the branch data administrator:

- by email: The Branch Leader at info@practicalphilosophysussex.com;

If you are not satisfied with the response, please contact the School’s General Manager

- by email: laura@fses.org;
- or by post: : Laura Counsell, General Manager, School of Philosophy and Economic Science, 11 Mandeville Place, London W1U 3AJ

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under applicable data protection laws from the Information Commissioner’s Office website: www.ico.org.uk.