# How we use Students' Data

LikeToBe Ltd takes your privacy very seriously and is committed to protecting and respecting your privacy.

LikeToBe Ltd is the data controller and Its registered office is LiketoBe, Engine Shed Station Approach, Temple Meads, Bristol, England, BS1 6QH . The Data Protection Officer is Antony Jinman who can be contacted at <a href="mailto:info@liketobe.org">info@liketobe.org</a>

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 (<a href="www.ico.org.uk">www.ico.org.uk</a>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### PERSONAL DATA WE COLLECT FROM AND ABOUT YOU

We will collect the following data:

### Personal Data you give us.

You may give us personal data about you:

- when you complete a registration to use the LikeToBe Platform
- when you use the LikeToBePlatform, for example, if you upload any data files or information that contains personal data (see further detail below);
- if you complete a survey or questionnaire at our request (including any survey or questionnaire we commission from a third party provider e.g. SurveyMonkey);
- if you provide feedback on the LikeToBe Website or LikeToBe Platform;
- when you report a problem with the LikeToBe Website and
- if you contact or correspond with us (for example, by phone, e-mail or otherwise) for any other reason.
- We will clearly set out which information you <u>must</u> provide us with in order to sign up and use the LikeToBe Platform. If you do not provide us with this information, you will not be able to use LikeToBe Platform. All other information is optional.

### If you are a **Student**, you:

- must provide us with your name, date of birth, gender, ethnic background, location and email address
- may provide us with details of your academic achievements
- must provide us with information about yourself e.g. skills, interests; career aspirations; personal statement
- may provide information about yourself when you complete a survey or questionnaire at our request; and
- may agree to participate in a video "case study" about the LikeToBe Platform for our promotional purposes, to be used on the LikeToBe Website.

### Data we collect about you.

### If you are a **Student**:

 When you use the LikeToBe Platform, details of your usage (including the date, time, location or duration of the usage).

# How we use Students' Data

#### **Uses Made of the Data**

We will use the above personal data held about you:

- To enable you to use the LikeToBe platform
- If you are a Student, to help us identify you and any accounts you hold with us (including verifying your eligibility to access and use the LikeToBe platform)
- If you are a Student, to carry out research and statistical analysis, for example, so that we can provide your School/College with an analysis of Students' use of the LikeToBe platform
- if you are a **Student**, to make suggestions and recommendations to you about workshops, work experience, internships, apprenticeships, job opportunities and other similar services and opportunities offered by third parties (including universities, other educational establishments and employers) that may be available to you and/or interest you. For example, we may use our databases to analyse the subjects you are studying in order to propose university courses, internships, apprenticeships, job opportunities or employers to you. We will only contact you by email with such information if you have specifically consented to this. More information about this is set out below under the headings "Marketing" and "Legal basis for processing";
- if you provide personal data when you complete a survey or questionnaire at our request, to obtain your views and opinions on education;
- to deal with any enquiries, correspondence, concerns or complaints you have raised;
- for our internal operations, including data analysis, testing, research, statistical purposes and troubleshooting;
- to ensure that content on the LikeToBe Website and LikeToBe Platform is presented in the most effective manner for you and for your device;
- as part of our efforts to keep the LikeToBe Platform secure; and
- to notify you about changes to any element of the LikeToBe Website or LikeToBe Platform.

#### **MARKETING**

If you are a **Student**, as mentioned above we would like to send you information by email and/or notifications on the LikeToBe Platform about services and opportunities from relevant third parties such as universities, other educational establishments and employers which may be of interest to you.

We will ask whether you would like us to send you these emails and/or notifications when you complete your registration on the LikeToBe Platform for the first time.

You can also manage your preferences by changing the privacy settings of your LikeToBe Platform account.

We will **not** provide your personal data to any other third party businesses for marketing purposes

### **DISCLOSURE OF YOUR PERSONAL DATA**

If you are a Student, we may share your personal data as set out below.

We will share some of your personal data with your School (including your Teacher(s) and Other School Staff) so that you can make the most of using the LiketoBe Platform. For example, your Teacher(s) will be able to see some of your personal data, including your name and interests. We may also share details of any workshops, open days, work experience, internships, apprenticeships, job opportunities and other similar services and opportunities offered by third parties (including universities, other educational establishments and employers) that are available to you with your School.

# How we use Students' Data

The information we share with your School may also be used by your School and by us for analytical purposes and to administer and facilitate your School's use of the LikeToBe Platform, for example to give your School an impression of how it is supporting its Students.

Please see the section headed "Your rights" below for details on your right to access any personal data which we hold about you.

If you are a **Student** and you complete a survey or questionnaire, our survey provider, may collect certain technical information, including data about your device or browser (such as your geographic location based on your device IP address) and data about pages you've visited and files you've viewed on their website or app to analyse your usage patterns, and for troubleshooting and bug fixing, for example.

Our survey provider, e.g. SurveyMonkey may also collect personal data contained in (or connected with) your survey or questionnaire responses, but this data will be aggregated and anonymised before being processed any further so that it cannot be linked to you.

You agree that we may share your personal data with the following categories of selected third parties in accordance with this Policy:

- analytics and search engine providers that assist us in the improvement and optimisation of the LikeToBe Website and the LikeToBe Platform; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use or the School Agreement; or to protect the rights, property or safety of LikeToBe, its users, and others.

#### **LEGAL BASIS FOR PROCESSING**

- For some of the uses of your personal data (as described above) there is a legal basis under applicable data protection laws for us to use such personal data <u>without your consent</u>. This includes, for example, where it is <u>necessary</u> for us to use the information in order to provide the LikeToBe Platform to you or where we have a <u>legitimate interest</u> to use it (a) to understand how the LikeToBe Platform is used and by whom; (b) to improve the LikeToBe Platform and ensure it is secure; (c) for statistical and analytical purposes; (d) for testing and troubleshooting or (e) to carry out surveys and research. Where this is the case, this statement fulfils our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you or your School, by giving you appropriate notice and explanation of the way in which your personal data will be used.
- Where consent is required for our use of your personal data, by ticking the appropriate consent box
  or otherwise communicating your consent (for example, by email), you consent to our use of that
  personal data as set out in this Policy. For example, we will only process your personal data for
  marketing purposes if we have your consent to do so.
- You can always change your mind about our processing of your personal data. If you change your
  mind you can update your account settings within the LikeToBe Platform, or contact us by email at
  info@liketobe.org, or in respect of marketing messages you can unsubscribe by using the
  unsubscribe link at the bottom of those marketing messages.

### How we use Students' Data

#### WHERE WE STORE YOUR PERSONAL DATA

- If your School is based outside the European Economic Area ("EEA"), we will process and store the information that we collect from you on our systems in the EEA, and we will also transfer personal data back to you (or your Students or Teachers) in your own country, in order to provide the Careers Calendar Platform to you and/or to fulfil our obligations in the Agreement. We will take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Policy.
- If your School is based in the EEA, we will only process and store your personal data in the EEA.

#### **SECURITY**

- All information you provide to us is stored on secure severs. We will use technical and organisational measures to safeguard your personal data.
- Where we have given you (or where you have chosen) a password which enables you to access the LikeToBe Platform, you are responsible for keeping that password confidential. We ask you not to share your password with anyone else.
- Unfortunately, the transmission of information via the Internet is not completely secure. Although
  we will do our best to protect your personal data, we cannot guarantee the security of your data
  transmitted via the LikeToBe Platform; any transmission is at your own risk. Once we have received
  your personal data, we will use strict procedures and security features to try to prevent
  unauthorised access.

#### **RETAINING AND DELETING PERSONAL DATA**

- We will retain the personal data we receive or collect about you for the period reasonably required
  for us to use it in accordance with this Policy or in accordance with our legal rights and obligations.
   We may need to retain <u>some</u> of your personal data for 6 years after you stop using the LikeToBe
  Platform, for legal reasons, for example, in case you or your School, College, Organisation make a
  complaint.
- We may store your non-personal information indefinitely.
- Unless we inform you otherwise (or you request that we erase your personal data), we will retain your personal data on record for as long as you continue to use the LikeToBe Platform. If you do not use the LikeToBe Platform for 4 years then we will delete your information. We hold onto your information for this 4 year period so that you can continue to access useful information.

#### **YOUR RIGHTS**

You have the following rights with regard to your personal data:

- Access. You have the right to obtain confirmation as to whether or not your personal data is being
  processed, and, if it is, request access to that personal data. We will need you to prove your
  identity before we release any personal data to you.
- **Rectification or erasure**. You have the right to request that we rectify or delete any personal data that we hold about you (unless we have the legal right to retain it).
- Restriction. You also have the right to restrict us from processing your personal data if the data is
  inaccurate, the processing is unlawful or we no longer need your personal information for the
  purposes of the processing.

# How we use Students' Data

- Change of preferences. You can change your data processing preferences at any time.
- **Complaints.** If for any reason you are not happy with the way that we have handled your personal data, please contact us. If you are still not happy, you have the right to make a complaint to the UK's Information Commissioner's Office.
- **Data portability.** In some circumstances, you have the right to request a copy of the personal data we hold about you, in a structured, electronic format, and to transmit such data to another organisation.
- The right not to be subject to a decision based solely on automated data processing. This includes profiling, where the decision has a legal or other significant effect, subject to certain limited exceptions, including where the data subject explicitly consents, where the automated data processing and decision-making is necessary for the performance of a contract with the data subject or where an applicable law that also requires measures to protect data subjects' rights authorises the automated data processing and decision making.
- The law requires that consent be:
  - o freely given, specific, and informed;
  - o unambiguous and take the form of an affirmative action or statement;
  - explicit for certain types of data processing, including, but not limited to, sensitive personal data processing and cross-border data transfers;
  - o presented in a manner clearly distinguishable from other matters, in an intelligible and easily accessible form; and
  - o provided in clear and plain language

### **DATA BREACHES**

The law requires LikeToBe to notify the Information Commissioner's Office without undue delay and no later than 72 hours after any breach of personal data that poses a risk of harm has been discovered. LikeTo Be must also document any personal data breaches.

Please note that if you ask us to stop processing your personal data in a certain way or erase your personal data, and this type of processing or data is needed for you to use the LikeToBe Platform you may not be able to use the LikeToBe Platform as you did before. This does not include your right to object to direct marketing, which can be exercised at any time without restriction.

If you would like to exercise any of the rights mentioned above, please contact us by emailing us at info@liketobe.org