

PRIVACY POLICY

1. INTRODUCTION

- 1.1 We respect your privacy and we are committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you when you visit our website (regardless of where you visit it from), register your interest with us, or register to support our Advisory Council or Business Council.
- 1.2 The Website is not intended for children and we do not knowingly collect data relating to children.
- 1.3 It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide to you 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.
- 1.4 In this Privacy Policy, when we say:
- 1.4.1 **we, us, our** or **Jobs Foundation**, we mean The Jobs Foundation (No. 13944207) whose registered office is at Three Tuns House, 109 Borough High Street, London, SE1 1NL.
 - 1.4.2 **you** or **your**, we mean the person who: accesses and uses the Website; makes a Donation to us; is employed or engaged by one of our donors; or who otherwise communicates with us.
 - 1.4.3 **Donation**, we mean a donation made by you either through the Website or directly to us, or made on your behalf.
 - 1.4.4 the **Advisory Council**, we mean our council of advisors.
 - 1.4.5 the **Business Council**, we mean our council of business supporters.
 - 1.4.6 the **Initiatives**, we mean our activities relating to the Advisory Council, the Business Council and / or the initiatives that we include you in.
 - 1.4.7 the **Website**, we mean the website found at <https://thejobsfoundation.com/> or any other website we may operate from time to time.
 - 1.4.8 **personal data**, we use these words to describe information that is about you and other individuals and which identifies you or those individuals.

2. PRIVACY POLICY

- 2.1 This Privacy Policy sets out the basis on which we collect and use personal data about you through your use of the Website, your involvement in our Initiatives, by making a Donation or any other way we obtain your personal data in accordance with this Privacy Policy.
- 2.2 This Privacy Policy describes:
- 2.2.1 who is responsible for the personal data that we collect about you;
 - 2.2.2 the personal data we collect about you;
 - 2.2.3 how we will use it;
 - 2.2.4 whom we may disclose it to; and

2.2.5 your rights and choices in relation to your personal data.

This is to make sure you have a full picture of how we collect and use your personal data.

3. WHO IS RESPONSIBLE FOR THE PERSONAL DATA THAT WE COLLECT?

3.1 We are the data controller for the purpose of data protection law, in respect of the personal data we collect about you. This is because we decide the purpose for which your personal data is used and how we use your personal data.

4. WHAT PERSONAL DATA DO WE HOLD ABOUT YOU?

4.1 We collect and use personal data about you in the course of our activities described above. The personal data we hold includes:

4.1.1 Information that you provide to us / we collect from you

The information that you provide to us / we collect from you may include the following:

Type of Personal Data	Examples
General	
Identity information.	First name, last name, title, date of birth, gender, marital status.
Contact information.	Address, email address and telephone number.
Business contact information.	Employer, business, name, address, email and telephone number, job title and industry.
Log in details.	Username and password for access to our Website.
Financial	
Financial information.	Billing address information, along with payment card details or other financial account number and account details.
Transaction information.	Details about payments from you and details of any Donation you have made us (including gift aid status).
Marketing and Market Research	
Marketing preferences (including subscriptions to any newsletters from us or third party partners).	Details of any marketing preferences that you express including any opt outs you provide.
Surveys.	Your views and opinions about our Initiatives, the Advisory Council or the Business Council.
Other	
Online activity information (to the extent that it constitutes personal data).	Technical information, through your internet browser or electronic device: Certain information is collected by most websites or automatically

Type of Personal Data	Examples
	<p>through your electronic device, such as your IP address (i.e. your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, electronic device manufacturer and model, language, time of the visit and pages visited.</p> <p>Technical information, using cookies and online tracking: Cookies are pieces of information stored directly on the device you are using to access our Website. Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using the Website and the pages visited.</p> <p>For more information about the cookies we use, please contact us using the details at paragraph 16 below.</p>
Complaints.	Details of any complaints or enquiries made by you in relation to the Initiatives, the Business Council, a Donation, or in relation to use of the Website.
Images.	Your image or video recording of you, where you attend an event or take part in a case study, or other publication.
Business directory.	Details of any support you give to the Jobs Foundation, or role you have with our Advisory Council or Business Council.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) when you fill in forms for us (including those on the Website or by registering with us directly);
- (c) via our social media pages, other social media content, tools and applications;
- (d) when you provide personal data via our Website or using other systems which we provide to you.

4.1.2 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.

4.1.3 **Information we receive from / collect from other sources**

- (a) If we carry out financial checks on you, we may receive personal information from the provider of these checks such as the names of directors, their addresses and details of previous roles they have held.
- (b) We may collect personal information from publicly available sources such as LinkedIn, including your name and contact details.

5. WHAT SENSITIVE PERSONAL DATA DO WE HOLD ABOUT YOU?

5.1 We may also collect certain sensitive personal information about you. This may include information concerning your political views (for example, where we are required to have bipartisan support for our Business Council). For further information on this, please see paragraph 7.3 below.

6. INFORMATION ABOUT THIRD PARTIES

- 6.1 In the course of using our Website or by engaging with the Advisory Council or Business Council, you may provide us with personal data relating to third parties. For example, you may provide us with the names and contact details of other individuals who you may be recommending the Jobs Foundation to.
- 6.2 We will use this personal data in accordance with this Privacy Policy. If you are providing personal data to us relating to a third party, you confirm that the third party is happy for you to share such personal data with us and that you have made them aware of this Privacy Policy.

7. HOW DO WE USE THE PERSONAL DATA WE COLLECT ABOUT YOU?

7.1 We use your personal data for a variety of different purposes during the course of us providing our Initiatives to you. The purposes for which we use your personal data are set out below. Under data protection law, we can only use your personal data if we have a legal basis to do so.

Examples of where we have a legal basis to process your personal data include when:

- 7.1.1 we have your **consent**;
 - 7.1.2 it is **necessary to enter into or perform a contract** we have with you (or to **take steps at your request prior to entering into that contract**);
 - 7.1.3 it is necessary to comply with a **legal obligation**;
 - 7.1.4 it is necessary in order to **protect your vital interests**; or
 - 7.1.5 it is in our **legitimate interests** to process your personal data.
- 7.2 We have set out the main reasons for using your personal data in the table below, under the heading **Legal Basis**. Where we rely on our legitimate interests, we have set out those interests in the table below.

Purpose	Legal Basis
To communicate with you and other individuals.	Where we have a contract in place with you, or are in the process of putting one in place, and we are communicating with you in connection with that contract, then we will rely upon the basis of performance of a contract . In all other situations, including where we do not have a direct contract in place with you, we rely upon legitimate interests in order to communicate with you. We require

Purpose	Legal Basis
	your personal information to enable us to include you in our Initiatives.
To carry out our commitments as a charity.	<p>Typically, for such processing we will do this to comply with one of our legal obligations or regulatory obligations.</p> <p>In all other situations, we rely upon our legitimate interests. It is in our legitimate interest to process personal data to achieve our charitable aims and to carry out operational management of the Jobs Foundation.</p>
To send you updates and/or newsletters on our Initiatives or our other activities that you have expressed an interest in or share other information that we believe may be of interest to you.	<p>Typically we will rely upon our legitimate interests. It is in our legitimate interest to contact you about our Initiatives or our other activities that you have expressed an interest in or that we believe may be of interest to you, unless you ask us not to.</p> <p>However, in some circumstances we are required by law to obtain your consent in order to send this kind of communications to you.</p>
Communications promoting specific charitable activities (including fundraising) relevant to the Jobs Foundation.	We are required by law to obtain your consent in order to send this kind of communication to you.
To conduct market research or a survey about our Initiatives that we believe may be of interest to you.	We will rely upon our legitimate interests . It is in our legitimate interest to conduct market research to ensure our Initiatives are of high quality and that we identify areas of improvement.
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	We will rely on our legitimate interests . This processing is necessary in order to understand how you use our Website, and to use this information to grow our business and inform our marketing practices.
To manage our relationship with you, including notifying you of any changes to our terms or Privacy Policy, or asking you to provide feedback.	<p>We will rely on our legitimate interests. It is within our interests to keep our records updated and to understand if you use our Initiatives.</p> <p>On some occasions, this processing will be necessary in order to comply with a legal obligation, for example when communicating how we use your personal data which is required by law.</p>
To manage any service or quality related issues, complaints, feedback, queries and other support.	<p>We will typically rely on our legitimate interests. We require your personal data in order to manage and ensure the Service we supply are of high quality, including the manner in which we supply our Initiatives.</p> <p>We may instead rely on performance of a contract, where we have a contract with you.</p>
To analyse the Initiatives that we provide to you and improve the quality/performance of our Initiatives.	We will rely on our legitimate interests . We have a legitimate interest to use your personal information in order to review and improve the Initiatives that we provide.

Purpose	Legal Basis
	In certain circumstances, we may rely upon your consent in order to assess the quality/performance of the Initiatives that we provide.
To compile case studies, promotional material or other publications (including using your image or a recording of you).	We will rely on your consent to compile a case study, promotional material or such other type of publication based upon your experience and insights to promote the Jobs Foundation, the Advisory Council and/or the Business Council.
To publish your involvement with the Jobs Foundation on our Website or other publications.	We will rely on your consent to publish your involvement with the Jobs Foundation, the Advisory Council and/or the Business Council.
To publish any Donation you have made and/or any fundraising activity you have taken part in (including using your image or a recording of you).	We will rely on your consent to publish any Donation and/or fundraising activity you have taken part in.
To comply with any legal or regulatory obligations (including in connection with a court order).	Necessary for compliance with a legal obligation to which we are subject.
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	We rely on our legitimate interests . We have a legitimate interest in the running of our business, provision of administration and IT services, network security, to prevent fraud and in the context of any business reorganisation or group restructuring exercise.

7.3 When we process your sensitive personal data (see paragraph 5 above), we will use it for the purposes set out above and rely on the following legal bases; either:

7.3.1 your **explicit consent**; or

7.3.2 in our capacity as a **not-for-profit body** processing your sensitive personal data as part of our legitimate activities in connection with our Purposes.

7.4 We may be required to obtain your personal data to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. If you do not provide the relevant personal data to us, we may not be able to perform our obligations pursuant to your contract with us.

8. WHO MAY WE DISCLOSE YOUR PERSONAL DATA TO?

8.1 In relation to the purposes highlighted above, we may share your personal data with:

8.1.1 our business partners, charity partners, service providers and sub-contractors (for example with organisations with whom we undertake a joint campaign with);

8.1.2 the police and other law enforcement agencies in connection with the prevention and detection of crime;

8.1.3 third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order);

- 8.1.4 other third parties in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of you, our customers, employees or other third parties;
 - 8.1.5 our professional advisors (including accountants, lawyers and auditors) that assist us in carrying out our business activities; and
 - 8.1.6 the media, with your permission which includes advertisers, social media platforms and advertising network to promote and publicise the work of the Jobs Foundation.
- 8.2 For a full list of the third parties with whom your particular personal data may be shared, please contact us using the details at paragraph 16 below.
- 8.3 We may also disclose your personal data to other third parties, for example:
- 8.3.1 in the event that we sell our business or buy any business or assets or choose to merge with another charity we will disclose your personal data to the prospective seller or buyer of such business or assets;
 - 8.3.2 if we or substantially all of our assets are acquired by a third party, personal data held by us will be one of the transferred assets; and
 - 8.3.3 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

9. WHERE WILL WE TRANSFER YOUR PERSONAL DATA?

- 9.1 If we transfer personal data outside the UK, we will implement appropriate and suitable safeguards to ensure that such personal data will be protected as required by applicable data protection law. For example, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- 9.2 For further information as to the safeguards we implement, please contact us using the details in paragraph 16 below.

10. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

- 10.1 We will keep your personal data in accordance with our internal retention periods.
- 10.2 Please note that the above retention periods may be extended where we need to preserve and use personal data for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal data for as long as is necessary to deal with the legal proceedings.

11. DATA SECURITY

- 11.1 We have put in place appropriate security measures to guard your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For further information about these measures, please contact us using the details at paragraph 16 below.
- 11.2 We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12. YOUR RIGHTS

- 12.1 You have certain rights with respect to your personal data. The rights will only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. Details of who to contact to exercise these rights can be found in paragraph 16.

	Summary of your rights
Right of access to your personal data	You have the right to receive a copy of your personal data that we hold about you and information about how we use it, subject to certain exemptions.
Right to rectify your personal data	You have the right to ask us to correct your personal data that we hold where it is incorrect or incomplete.
Right to erasure of your personal data	You have the right to ask that your personal data be deleted in certain circumstances. For example: <ul style="list-style-type: none"> • where your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise used; • if you withdraw your consent and there is no other legal ground which we can rely on for the continued use of your personal data; • if you object to the use of your personal data (as set out below); • if we have used your personal data unlawfully; or • if your personal data needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal data	You have the right to suspend our use of your personal data in certain circumstances. For example: <ul style="list-style-type: none"> • where you think your personal data is inaccurate but only for so long as is required for us to verify the accuracy of your personal data; • the use of your personal data is unlawful and you oppose the erasure of your personal data and request that it is suspended instead; • we no longer need your personal data, but your personal data is required by you for the establishment, exercise or defence of legal claims; or • you have objected to the use of your personal data and we are verifying whether our grounds for the use of your personal data override your objection.
Right to data portability	You have the right to obtain your personal data in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies: <ul style="list-style-type: none"> • to personal data you provided to us; • where we rely on the following legal bases: <ul style="list-style-type: none"> • consent; or • for the performance of a contract; and • when the use of your personal data is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal data	You have the right to object to the use of your personal data in certain circumstances and subject to certain exemptions. For example: <ul style="list-style-type: none"> • where you have grounds relating to your particular situation and we use your personal data for our legitimate interests (or those of a third party); or

	Summary of your rights
	<ul style="list-style-type: none"> if you object to the use of your personal data for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal data.
Right to complain to the relevant data protection authority	<p>You are entitled to lodge a complaint at the Information Commissioner's Office (ICO) if you are unsatisfied with how your data has been processed.</p> <p>You can contact them on 0303 123 1113, go online to https://ico.org.uk/make-a-complaint/ or write to them at:</p> <p>Information Commissioner's Office Wycliff House Water Lane Wilmslow Cheshire SK9 5AF</p>

12.2 Further information on your rights in respect to your personal data can be found here: <https://ico.org.uk/your-data-matters/>.

12.3 You can contact us at any time in order to find out more about your rights, or to exercise those rights, using the details set out in paragraph 16 below.

13. THIRD PARTY LINKS

13.1 The 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 how they handle your personal data. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

14. COOKIES

14.1 For more information about the cookies we set, please contact us using the details at paragraph 16 below.

15. CHANGES TO OUR PRIVACY POLICY

15.1 Any changes we make to this Privacy Policy in the future will be posted on this page. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

16. QUERIES

16.1 If you have any questions regarding this Privacy Policy or the way we use your personal data, please contact us by:

16.1.1 telephone on 0203 475 1382;

16.1.2 email at info@thejobsfoundation.com; or

16.1.3 post to Three Tuns House, 109 Borough High Street, London, SE1 1NL.

This Privacy Policy was last updated on 28 June 2023.