

STEMFirst – Privacy Policy – Updated 17th May 2018

STEMFirst Limited ICO Registration Numbers: Z2618136

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Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending our events), unless a different policy is displayed.

STEMFirst Ltd offer a wide range of STEM products and services, including free newsletters, teacher twilights, employer visits, advice on STEM engagement and employer linkage. We refer to all of these products, together with our other services and websites as "STEM Services" in this policy.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, do not access or use our STEM Services or interact with any other aspect of our business.

STEM Offers for third-party organisations

Where we provide the STEM Services under contract with a third-party organisation (for example another STEM Provider, National STEM Bodies or Educational Establishments) that organisation controls the information processed by our STEM Services. For more information, please see Notice to End Users below.

What information we collect about you

We collect information about you when you provide it to us, when you use our STEM Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect information about you when you input it into registration databases for the third-party contracts we run, by attending our events or by otherwise providing it directly to us.

Account and Profile Information:

We collect information about you due to your engagement with our STEM Services. For example, you provide your contact information and when you register for our STEM Services, register for opportunities, twilights and resources and link to the third-party programmes that we administrated.

We hold names, email addresses and other contact details that you provide in order for us to inform you of our STEM Services and opportunities. This data includes any information about you that you may choose to share with us. We also collect feedback you provide directly to us through the STEM services you engage with and filter or otherwise scrub the information to exclude information that might identify you.

Content you provide through our websites:

The STEM Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, competitions, activities or events.

Information you provide through our STEM support channels: The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a STEM Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our consultants directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

Your use of the Services: We keep track of certain information about your subject preferences and age / types of young people you support. This is so that we can target sending out specific opportunities via our STEM Services.

Information we receive from other sources

We receive information about you from other STEM Service users, from third-party contracts, from STEM Learning on behalf of our STEM Ambassador Contracts and via employers.

Other users of the Services: Other users of our STEM Services may provide information about you when they submit content through the STEM Services. For example, you may be mentioned by a colleague planning a STEM Event, or we may be passed your details from your HR lead if your organisation is planning a training session for personnel. We also receive your email address from other STEM Service users when they provide it in order to invite you to specific STEM opportunities. Similarly, an administrator may provide your contact information when they designate you as the lead contact for specific STEM interactions.

STEM Partners: We work with a network of STEM partners who provide consulting, implementation, training and other services around our STEM products. Some of these partners also help us to market and promote our products, generate leads for us, and broker our opportunities. We receive information from these partners, such as email addresses, names and organisation details so that we may signpost you to additional free opportunities.

How we use information we collect

How we use the information we collect depends in part on which STEM Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

We hold names, email address, job title and organisation name data. We use this information about you to provide the STEM Services to you, including to send you relevant opportunities with STEM, careers, employer links and national and regional events. Our STEM Services also include tailored features that personalise your experience so that you get newsletters and opportunities relevant to your organisation and the types of young people you support. For example, we may use your stated job title and organisation to send activities that are targeted at a specific regional area or type of audience.

To communicate with you about the Services: We use your contact information to send communications via email and by telephone, including confirming your events you have registered for, training you have booked or resources/activity you are facilitating. Our remit is to engage education and the public in the national STEM agenda, and we will communicate with you to market, promote and drive engagement with the STEM Services. We use your contact information and information about how you use the STEM Services to send communications that may be of specific interest to you, including by email, Twitter and via phone. These communications are aimed at driving engagement and maximizing what you get out of the STEM Services, including information about new events, opportunities, funding and resources we think may be of interest to you. You can control whether you receive these communications as described below under "Opt-out of communications."

Customer support: We use your information to resolve issues you encounter, to respond to your requests for STEM assistance, and to improve the STEM Services.

For safety and security: We use information about you and your STEM Service use to verify accounts and activity, to monitor suspicious activity with regard to engagement with young people and employers and to identify violations of Service policies.

To protect our legitimate business interests and legal rights: . Due to the nature of our services – aligned with Central Governments STEM (Science, Technology, Engineering and Maths) agenda, we have a legitimate interest in contact you with STEM related offers, information and support services. You can control whether you receive these communication as described below under 'Opt-out of communications'. Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures

With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories, case studies or photographs to promote the STEM Services, with your permission.

Legal bases for processing (for EEA users):

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

We need it to provide you the STEM Services, provide customer support and personalised features and to protect the safety and security of the Services;

It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for to promote the STEM Services and to protect our legal rights and interests;

You give us consent to do so for a specific purpose i.e. registering for a brokered STEM programme or offer; or we need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. a STEM Partner) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the STEM Services.

How we share information we collect

We collaborate with STEM Partners, educational establishments and Government funded STEM Providers, and we want our STEM Services to work well for you. This means sharing information with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible STEM opportunities, but we are not in the business of selling information about you to advertisers or other third parties for sales and marketing purposes.

Sharing with other Service users

When you use our STEM Services, we share certain information about you with other STEM Service users.

For collaboration: When you register for twilight opportunities, training courses or other competitions/offers we need to share you contact details with deliverers and STEM third parties who have a legitimate interest to use this information for the facilitation of the opportunity. Please be aware that some aspects of the STEM Services, when you give consent for photographs or comments/feedback, can be made publicly available, meaning any content posted, including information about you, can be publicly viewed and indexed by and returned in search results of search engines.

Community Forums: Our websites offer publicly accessible blogs and twitter links. You should be aware that any information you provide on these websites may be read, collected, and used by any member of the public who accesses these websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these STEM Services. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our STEM Services – this will only extend to your name and email address if you have specifically registered for a particular opportunity.

Links to Third Party Sites: The STEM Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

Social Media Widgets: The STEM Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

Third-Party Widgets: Some of our STEM Services contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our STEM Services. Your interactions with these features are governed by the privacy policy of the company providing it.

With your consent: We share information about you with third parties when you give us consent to do so. For example, we often write case studies of satisfied customers on our public websites or use in reporting to our funders. With your consent, we may post your name alongside the testimonial.

Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights: In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our services, (d) protect our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person, or for child protection purposes

How we store and secure information we collect

Information storage and security

We host the information we collect in the UK, and we use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

How long we keep information

We will keep your data indefinitely, until notified to delete it or you inform us that you no longer have a requirement for receiving details of our STEM Services. We will however also retain some of your information as necessary to comply with our legal obligations, to resolve

any future disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our STEM Services.

Information you share on the Services: If your account is deactivated or disabled for our third party project or if you have asked us to remove you from our distribution lists, some of your information and the content you have provided will remain in order to allow your colleagues to make full use of the STEM Services. For example, we continue to display messages you sent , case studies you contributed to or to continue to display content you provided.

Managed accounts: If the Services are made available to you through an organization (e.g., your employer or school), we retain your information as long as required by the administrator of your account. If an administrator forwards on information about our STEM Services, you must contact them if you wish to stop receiving information.

How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

Your Choices:

You have the right to request a copy of your information, to object to our use of your information , to request the deletion of your information. Below, we describe the tools and processes for making these requests

Where the Services are administered for you by an administrator (see "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example by linking to a third-party STEM scheme, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information: STEMFirst hold email address and names, and will send you relevant information on local, regional and national STEM opportunities. You are on our distribution lists as we have a legitimate interest in brokering STEM opportunities to you.

If you are receiving STEM Hub information from ourselves via your STEM Learning account – you will have to delete your account at www.stem.org.uk in order to prevent further contact via that platform. You can update your profile information within your profile settings on the STEM Learning platform and modify content that contains information about you using the editing tools associated with that content.

Deactivate your account: If you no longer wish to use our Services, you or your administrator may be able to remove you from our contact lists. If you do not wish to continue receiving information, please contact our Data Protection Officer Susan Hargreaves on sue.hargreaves@stemfirst.com and we will delete your information.

If you are receiving STEM Hub information from ourselves via your STEM Learning account – you will have to delete your account at www.stem.org.uk in order to prevent further contact via that platform. You can update your profile information within your profile settings on the STEM Learning platform and modify content that contains information about you using the editing tools associated with that content.

Delete your information: Where you gave us consent to use your information for a specific purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. If you object to information about you being shared with a third-party STEM provider, please do not register for STEM offers without reading the specific information contained in each opportunity before registering.

Opt out of communications: You may opt out of receiving STEM communications from us by using the unsubscribe link within each newsletter email, updating your email preferences within your STEM Learning profile or by contacting us as provided below to have your contact information removed from our promotional email list or registration database.

Other important privacy information

Notice to End Users

Many of our products are intended for use by organisations, employers and educational establishments. We are not responsible for the privacy or security practices of any third party's administrator's organization, which may be different than this policy.

If you use an email address provided by an organization (such as your work email address) to access the STEM Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over the content that you receive and may exert control on the information that we can send you .

Please contact your organization or refer to your administrator's organizational policies for more information.

Our policy towards children

The STEM Services are not directed to individuals under 16 however our work is intended to be for the benefit of young people. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services. All employers and STEM Ambassadors that we link with you will be Enhanced DBS checked unless otherwise stated however it is your responsibility to ensure that their clearance and insurances are relevant and up to date. On no occasion should young people be left unsupervised with employers of third party deliverers.

Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the STEM Services homepages, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the STEM Services and deactivate your account(s) with STEM Learning or other brokered third parties, as outlined above.

Contact Us

Your information is controlled by STEMFirst Ltd. If you have questions or concerns about how your information is handled, please direct your inquiry to STEMFirst Ltd, Oaksmead, Copster Green, Blackburn, Lancashire BB1 (EP

E-mail: Sue.Hargreaves@stemfirst.com

Key Changes

Better navigation and user-friendly language. To make the policy easier to understand, we use clear, plain language and examples that illustrate our activities. We reformatted our privacy policy page with active links, so you can quickly find the information that matters most to you.

More control over your information. We make it easy for you to control the information you provide to us. Our policy explains how you can make choices about your information, and the measures we've put in place to keep your information secure.

STEMFirst Limited

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