

# UWC ATLANTIC PRIVACY POLICY

CATEGORY	<b>External Relations</b>
POLICY OWNER	<b>Director of Operations and Sustainability</b>
DATE & VERSION	<b>29th September 2023 Version 1</b>  (To replace the Alumni & Supporter Privacy Policy; Parent & Student Privacy Policy; Governor Privacy Policy and Staff Privacy Policy)
APPROVED BY	<b>External Relations Committee/Audit &amp; Risk Committee</b>
REVIEW FREQUENCY	<b>Three year review cycle</b>

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## 1. Policy Purpose

United World College of the Atlantic Limited has a responsibility to document how we protect your personal data. This is a legal requirement within the Data Protection Act (2018) and the UK GDPR under the 'Right to be informed'. This privacy notice will outline our responsibilities to you.

### 1.0 Key Terms

1.1 Whilst every effort has been made to outline our responsibilities to you in as clear, concise, and easy to understand manner as possible, we do need to use certain terms throughout this privacy notice.

1.2 Definitions of terms used in this document are as below:

- **College:** This refers to United World College of the Atlantic Limited.
- **Data Controller:** A data controller has the responsibility of deciding how personal data is processed, the purpose for the data processing, and how to protect the personal data from harm.
- **Data Processor:** In a similar way to data controllers, data processors must protect people's personal data. However, they only process it in the first place on behalf of the data controller. They would not have any reason to hold personal data if the data controller had not asked them to do something with it.
- **Data Protection Act (DPA 2018):** The DPA 2018 sets out the legal data protection framework in the UK, alongside the UK GDPR. It contains three separate data protection regimes:
  - Part 2: sets out a general processing regime (the UK GDPR);
  - Part 3: sets out a separate regime for law enforcement authorities; and
  - Part 4: sets out a separate regime for the three intelligence services.
- **Data Subject:** A data subject is a living person who can be identified from personal data.
- **GDPR:** This stands for General Data Protection Regulation (GDPR), the EU's and the UK's agreed standards for data protection that are also written into UK law through the Data Protection Act 2018 (DPA 2018).
- **Individual Rights:** In UK data protection law, individuals have rights over their personal data. These rights allow the individual to ask the data controller to do something, or stop doing something with their personal data. There are eight individual rights.
- **Information Commissioner's Office (ICO):** The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights, covering laws including the Data Protection Act (DPA 2018), Freedom of Information Act (2000), Privacy and Electronic Communications Regulations 2003 (PECR), and UK GDPR.
- **Lawful Basis:** A lawful basis is the legal reason or legal grounds relied upon for the processing of an individual's personal data. There are six lawful bases to choose from: consent, contract, legal obligation, legitimate interest, public task, and vital interests.

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- **Parents and Guardians:** The data subjects whose personal data is the subject of processing activity.
- **Personal Data:** Personal data is information about who you are, where you live, what you do, and more. It is all information that identifies you as a data subject.
- **Privacy and Electronic Communications Regulations 2003 (PECR):** PECR sits alongside the DPA 2018 and the UK GDPR. This legislation gives people specific privacy rights in relation to electronic communications, and electronic processing of their personal data.
- **Processing:** Processing means taking any action with someone's personal data, including storing that data, and archiving personal data.
- **Student:** The data subject whose personal data is the subject of processing activity.
- **United World College of the Atlantic Limited:** The data controller, who has responsibilities for processing under the Data Protection Act (2018), UK GDPR, and other relevant UK privacy legislation.

## 2. Policy Statement

### 2.0 Scope

2.1 The scope for United World College of the Atlantic Limited is any data subject whose personal data is processed upon instruction in line with UK privacy legislation including the DPA 2018, PECR and UK GDPR.

2.2 We also acknowledge any additional responsibilities requested by the industry regulator in the UK, the Information Commissioner's Office (ICO).

2.3 The DPA 2018 and UK GDPR have a material scope covering personal data that is processed either electronically or is processed as part of a physical paper filing system.

2.4 United World College of the Atlantic Limited will adhere to the seven UK GDPR data processing principles when handling personal data:

- Lawfulness, Fairness, and Transparency;
- Purpose Limitation;
- Data Minimisation;
- Accuracy;
- Storage Limitation;
- Integrity and Confidentiality (Security); and
- Accountability.

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2.5 All employees of United World College of the Atlantic Limited who interact with alumni, guardians, parents, students and supporters are responsible for ensuring that this privacy notice is drawn to their attention, at the earliest available opportunity.

### 3. Policy Implementation

3.1 Sections of the policy implementation include:

- Lawfulness
- Fairness
- Transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation and deletion
- Data Transfer and Confidentiality (Security)
- Accountability

Further details of the implementation can be found in Annex A.

### 4. Related Information

Data Protection Policy

### 5. Policy Measurement and Reporting

The Privacy Policy is reviewed every 3 years, or where required by a change in the law, by the External Relations Committee of the Board and the Director of Operations & Sustainability, as part of the policy review cycle and as part of the whole College development plan. Part of this review process will consider to what extent the policy is being used as an active working document.

The policy is communicated to the school community electronically on **Every** and is available on the UWCA website.

## Annex A - Policy Implementation

### 1. Lawfulness

1.1 United World College of the Atlantic Limited is a private company limited by guarantee without share capital, based in Wales, under company registration number 00673076, complying with the laws of England and Wales.

1.2 United World College of the Atlantic Limited is registered with the ICO under registration number Z5694754.

1.3 United World College of the Atlantic Limited acts as a data processor and data controller. We are responsible for the personal data that we process (on behalf of data subjects), whilst having our own accountability measures in place for ensuring compliance with our UK GDPR data controller responsibilities.

1.4 United World College of the Atlantic Limited processes personal data in order to properly manage a student's educational experience and for the College to fulfil its obligations to all parties. United World College of the Atlantic Limited also determines the scope of data processing, what data we process, and for what purpose.

1.5 From time to time we may appoint data processors on behalf of United World College of the Atlantic Limited. There will always be a written agreement in place with each of our data processors documenting how personal data will be processed, the purposes for processing, how the personal data is safeguarded, and how long it will be retained for. United World College of the Atlantic Limited has the overall responsibility for all data processors.

1.6 United World College of the Atlantic Limited has a duty of care acting as a data controller to appoint a Data Protection Officer (DPO). We have a legal obligation to notify the ICO of their name and contact details. Our appointed Data Protection Officer (DPO) is CSRB Limited. CSRB can be contacted by telephone on 0117 325 0830 or via email at [dpo@csrb.co.uk](mailto:dpo@csrb.co.uk).

1.7 United World College of the Atlantic Limited uses lawful bases, as set out in UK GDPR Article 6, when we process your personal data:

- **Contract** - personal data is processed by us for the purposes of managing a student's educational experience and for the College to fulfil its obligations to all parties, through the implementation of a contract.
- **Consent** – the College gives data subjects a clear choice with regard to the processing of their personal details for a specific purpose, and the data subject then gives their clear consent for the College to go ahead with the processing. Consent must be freely given, specific, informed, and

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unambiguous. Data subjects will consent via a clear affirmative action. For example, students providing consent for certain academic attainment information to be shared with sponsors.

- **Legal Obligation** – there will be circumstances where we are legally obliged to conduct certain activities, which will involve processing personal data. This could be to comply with common law or to undertake a statutory obligation. For example, we may need to check if a student has the legal right to reside and study in the UK, this is a legal obligation.
- **Legitimate Interests** – the College must balance the organisation's interests against the interests, rights and freedoms of individuals. For example, we would communicate with data subjects regarding important college information, and to inform data subjects of complimentary services provided by the College, using legitimate interests as our lawful base for this communication.

1.8 United World College of the Atlantic Limited may process certain special category data on behalf of our students and other individuals. This may include the following categories of personal data revealing:

- race or ethnic origin;
- sex assigned at birth;
- gender identity and expression;
- disability (whether an impairment or health condition);
- neurodiversity;
- age;
- marriage or civil partnership;
- nationality;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- health;
- a person's sex life; and
- a person's sexual orientation.

1.9 United World College of the Atlantic Limited ensures that all processing of the above special category data is lawful, fair, transparent, and complies with all the data processing principles of the UK GDPR.

1.10 United World College of the Atlantic Limited can only process special category data if we can meet one of the specific conditions in Article 9 of the UK GDPR. We may also have to meet additional conditions set out in Part 1 of Schedule 1 in the DPA 2018.

The Article 9 conditions used by the College are:

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- *Explicit consent* – we outline our requirements for the data processing to alumni, guardians, parents, students, suppliers and supporters, and record freely given, specific, informed, and unambiguous consent given by an affirmative action;
- *Employment, social security and social protection* - This condition is met by the College if:
  - (a) the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the data controller or the data subject in connection with employment, social security or social protection, and
  - (b) when the processing is carried out, the data controller has an appropriate policy document in place, for example a data processing agreement.
- *Health or social care (with a basis in law)* - This condition is met if the data processing is necessary for health or social care purposes. In this paragraph “health or social care purposes” means the purposes of:
  - (a) preventive or occupational medicine,
  - (b) the assessment of the working capacity of an employee,
  - (c) medical diagnosis,
  - (d) the provision of health care or treatment,
  - (e) the provision of social care, or
  - (f) the management of health care systems or services, or social care systems or services.
- *Vital Interests* – processing of special category data is required to share personal data in emergency situations to protect a data subject’s life. For example, if a student collapses at the College, is unable to talk, and we need to communicate with a paramedic that they have a medical condition.

1.11 United World College of the Atlantic Limited may transfer personal data we collect about you to countries outside the UK. We treat each international data transfer individually and assess the risk associated with the transfer and whether a suitable level of adequacy with UK data privacy legislation is available, within the country to where the personal data is being transferred.

1.12 Data transfers within the EEA/EU/UK flow freely under the ‘Adequacy Decision’ agreed between the UK and European Parliament on 27 June 2021. If the international data transfer is outside the EU/EEA/UK then risk assessment criteria and appropriate safeguards would be put in place, such as Data Protection Impact Assessments (DPIAs). We would also state our lawful basis for the international data transfer (refer to paragraph 1.7), in addition to why the transfer is necessary.

## 2.0 Fairness

2.1 United World College of the Atlantic Limited processes personal data in a fair way. We do this by acknowledging the individual’s rights with regards to personal data. There are eight individual rights:

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- *Right to be informed* – data subjects have the right to know why we are collecting and processing personal data, this right is met by the provision of this privacy notice and any subsequent privacy documentation;
- *Right of access* – you have the right to know what personal data we have on record and request a copy;
- *Right of rectification* – you have the right to correct personal data that we hold about you that is inaccurate or incomplete;
- *Right to be forgotten* – in certain circumstances you can ask for the personal data we hold about you to be erased from our records;
- *Right to restriction of processing* – where certain conditions apply you have a right to ask us to only process your personal data for certain processing activities;
- *Right of portability* – you have the right to have the personal data we hold about you transferred to another data controller;
- *Right to object* – you have the right to object to certain types of data processing such as marketing; and
- *Right to object to automated processing, including profiling* – you also have the right to object to the legal effects of automated processing or profiling.

2.2 United World College of the Atlantic Limited will only handle personal data in ways that individuals would reasonably expect, and not use it in ways that have unjustified adverse effects on them.

2.3 United World College of the Atlantic Limited will obtain personal data in a fair way. We will seek explicit consent from the data subject, or securely transfer personal data into the organisation where explicit consent has been given and recorded previously.

2.4 United World College of the Atlantic Limited always considers the rights and freedoms of data subjects when processing personal data. This could be for individuals or those part of a wider group.

2.5 United World College of the Atlantic Limited will have a written agreement with each data subject setting out the terms for data processing.

### 3.0 Transparency

3.1 Transparency is fundamentally linked to fairness. United World College of the Atlantic Limited will always be clear, open and honest with individuals from the start, about who we are and how and why we need to use your personal data.

3.2 United World College of the Atlantic Limited will inform individuals from the outset regarding the types of personal data we need to process, usually within our business terms, contract documentation, this privacy notice and other privacy documentation.

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### 3.3 United World College of the Atlantic Limited processes the following personal data categories:

- *Admissions* - including enrolment papers, application forms, and means testing information (where applicable);
- *Assessment and attainment* - examination results, teacher reports, effort and engagement grades, academic assessments and participation in other curricular and non-curricular activities;
- *Atlantic Connect* - if you have created an account with Atlantic Connect to connect with our alumni, we will collect any personal details you input such as contact details and employment status.
- *Attendance* - such as lessons attended, number of absences, check-in; lateness; co-curricular activities attendance; absence reasons, leave of absence and any previous schools attended;
- *Characteristics* - such as ethnicity, language, financial background and scholarship funding;
- *Communications* - record of communications we have had with you including emails, summary of calls or any letters;
- *Council Tax* - names of people who currently occupy properties to the local council;
- *Details of your UWC Atlantic education* - such as if you are a student or staff member we will document your time at the College, if you were a fee payer or on a scholarship, your sponsor (if applicable), the year you studied at the College, subjects you studied, clubs and CAS subjects you were involved in, if you participated in a rescue service, your Tutor, House and IB results;
- *Disciplinary information* - follow up measures/sanctions, concerns and issues reported, measures taken, referrals made, communication of disciplinary records to relevant stakeholders;
- *Educational needs such as English as an Additional Language or Additional Learning Needs* - support put in place and communication to relevant parties;
- *Emergency contact details* - such as details of related parties (e.g. family/spouse information);
- *Employment* - such as the name of the organisation you work for, your position, key achievements, biographies, industry or sector and LinkedIn profile;
- *Events* - email, and any related information such as dietary, medical or special requirements where needed, a record of any College events you have attended including reunions, visits, conferences, graduation, online events and other events we may host on and off campus and any guests you brought;
- *Guests attending events including name, email address, and event related information* - such as dietary requirements when needed;
- *Financial* - if you are a donor, supplier, or parent/ guardian, we will use your contact details to prepare invoices and chase payments as well as store our contracts or letter of agreements with you;
- *Giving history* - including your history of donations and support, lifetime giving, pledges and instalment agreements, gift agreements, gifts in your Will, gifts in kind, why you have donated, what you have donated to and Gift Aid status;
- *Governors* - we will collect details of your relationship to the College; personal identifiers such as name, date of birth, national insurance number, passport information, contact details, nationality,

languages, career history, other appointments, professional memberships/ affiliations; DBS checks, declaration of related parties (such as family/spouse) and potential conflicts of interest; bank account details for reimbursing expenses; gifts and hospitality records, attendance at college events, medical, welfare and administration, images, philanthropy and due diligence profile, We may need to share your details for setting up agreements with financial companies such as Stripe, PayPal etc.

- *People and Culture - Employees and applicants for roles* - ID, employee number, eligibility to work in UK, qualifications, application forms, health and disciplinary issues, pay information, passport and visa information (if relevant), references, DBS numbers, personal data and emergency contact details, gender identity and expression, sex assigned at birth, neurodiversity, ethnicity, age, disability (whether and impairment or health condition), religion and nationality, marriage or civil partnership, criminal records relating to unspent convictions, attendance records, performance information, banking information, national insurance number and tax information, pension details, references, images.
- *Images* - including digital images for identification, photographs, CCTV for security purposes;
- *Information about your time at other academic establishments* - such as university, the course you studied or if you attended another UWC College;
- *Interests* - this might be current and past interests;
- *Medical, welfare and administration* - such as doctor's information, health and dental, allergies, medication, dietary requirements and mental health information;
- *Payroll* - if you are a staff member we will use your details for payroll purposes;
- *Personal identifiers, contacts and characteristics* - such as name, unique student number, unique alumni ID, contact details, email address, phone numbers, residential address, and your relationship to other contacts on our database (e.g. partner, sibling, parent, current students, other alumni);
- *Prospect and philanthropy research* - such as an assessment of your wealth, assessment of your propensity to give, information about your affinity to the College, the likelihood of you supporting us, any asks we have made or plan to make, due diligence checks, targeted internet searches and sources of public data where relevant, and for fundraising purposes media articles we have sourced about you;
- *Public data sources* - for the purposes of fundraising we may use data sources to collect information. Sites include (but are not restricted to): Companies House, company websites, Charity Commission, electoral roll, national change of address service, LinkedIn, property websites, Honour and Rich lists, other prospect research and due diligence sites;
- *Relationship with the College* - such as if you are an alumni, current or former parent, student, alumni of another UWC, staff member, former staff member or if you are connected to an organisation that works with the College;
- *Sensitive information*: such as sex assigned at birth, gender identity and expression, disability (whether an impairment or health condition), neurodiversity, age, marriage or civil partnership and nationality

- *Safeguarding information* - such as court orders and professional involvement, concerns and issues reported, measures taken and referrals made;
- *Students enrolling on to summer programmes including personal details, medical, dietary, parental details*
- *Timetabling* - information about your subject choices, teachers and when you need to attend each lesson.
- *Trips and activities* - passport information, visas and other legal documentation;
- *Visa and flights* - if you are a student who receives additional costs for your visa or flights, this may include the relevant information we need to be able to make the visa payment or flights on your behalf;
- *Visits* - information about your visits to the College, when you are coming, why you are coming, who you are visiting, car registration number for entry barrier and the time you will arrive or finish;
- *Volunteering* - such as if you have expressed an interest in donating your time and talent, the number of hours you have volunteered, what you did, when you volunteered and its estimated value; and
- *Year you attended UWC Atlantic if you are a parent of a student applying for summer programme.*

3.4 United World College of the Atlantic Limited informs individuals about all personal data processing in a way that is easily accessible and easy to understand, using clear and plain language. We do this by ensuring all United World College of the Atlantic Limited's employees receive annual data protection and UK GDPR training, whilst having a company information governance framework with up-to-date policies, procedures, and processes.

3.5 United World College of the Atlantic Limited hope we can resolve any query or concern you raise about our use of your personal data. You can contact the Director of Operations and Sustainability at United World College of the Atlantic Limited in the first instance at any time by telephone on +44(0)1446 799000 or via email at [enquiries@uwcatlantic.org](mailto:enquiries@uwcatlantic.org).

3.6 United World College of the Atlantic Limited has appointed a certified Data Protection Officer (DPO) to act in the interests of all parties. Should you require further information with regards to personal data processing and the protection of your personal data, please contact our nominated DPO at CSRB Limited. They can be contacted by telephone on 0117 325 0830 or via email at [dpo@csrb.co.uk](mailto:dpo@csrb.co.uk).

3.7 Should we not be able to resolve the complaint, you have the right to lodge a complaint with the lead authority. The lead authority in the UK is the Information Commissioner's Office (ICO), who may be contacted by telephone on 0303 123 1113 or by visiting [www.ico.org.uk](http://www.ico.org.uk).

## 4.0 Purpose Limitation

4.1 United World College of the Atlantic Limited will always be clear about what the purpose is for any personal data processing from the very start. We process your personal data for the following purposes:

Purpose for data processing	Legal Base
Providing educational support and courses of study for students	Contract, Legal Obligation
Support student learning	Contract, Legitimate Interest
Monitor and report on student attainment progress	Contract, Legitimate Interest
Provide appropriate pastoral care	Consent
Assess the quality of our services	Legitimate Interest
Keep students safe (food allergies, or emergency contact details)	Legal Obligation, Legitimate Interest
Meet the statutory duties placed upon us	Legal Obligation
Ensure appropriate allocation of funding and financial support	Contract
Understand why you donate and what has inspired you to want to give	Legitimate Interest
Keep a record of communications we have had with you	Contract, Consent, Legal Obligation
For due diligence and to ensure integrity with our partners	Contract, Legal Obligation
Understand your past relationship and involvement in the College	Legitimate Interest
Enable us to keep in touch with you	Consent, Legal Obligation

Develop a better understanding of our alumni and supporters	Legitimate Interest
Keeping individuals apprised of our activities and developments	Legitimate Interest
For financial purposes - such as creating an invoice, completing payroll or for chasing payments	Contract, Legal Obligation
Invite you to alumni and other college events	Legitimate Interest
Provide UWC Atlantic services to you	Contract, Legitimate Interest
Identify ways in which you can support us, through donations or other forms of financial and non-financial support	Consent, Legitimate Interest
Enable connectivity amongst our alumni and supporters as part of the wider UWC Atlantic community	Consent, Legitimate Interest
Safeguarding of students	Legal Obligation
Timetabling	Contract
(People & Culture ) to keep updated records of all staff members, equality and diversity monitoring of staff and of applicants for roles, ensure staff are eligible for employment, have the necessary skills, qualifications and experiences needed for their duties, support staff welfare and wellbeing, manage performance and attendance, support professional development, ensure accurate payroll records and payments and ensuring all members of staff are contactable in the event of illness or emergencies	Contract, Legal Obligation, Legitimate Interest

4.2 United World College of the Atlantic Limited will record our purposes for personal data processing as part of our legal reporting obligations. We will also document them in any additional privacy documentation provided.

4.3 United World College of the Atlantic Limited will only use personal data for a new purpose if this is either compatible with the original purpose, or we obtain consent, or we have a clear obligation, or function set out in law.

4.4 United World College of the Atlantic Limited may need to disclose your personal data to the parties listed below. This is so that we are able to provide our services to you and to the College. We will not disclose your personal data to any other third party. Where this is required, the College ensures that the data recipient adheres to adequate data protection requirements. Such instances could include:

- Atlantic College Enterprise Ltd (ACEL);
- Alumni coordinators for UWC events;
- UWC Atlantic Class Year Reps, Fundraising Representatives and other volunteers, who are supporting us with any work required;
- UWC National Committees;
- UWC International Office;
- UWC Atlantic Board of Governors;
- Universities and other educational establishments;
- Visa/immigration authorities;
- Travel companies for flight booking;
- Medical/welfare professionals (like the NHS);
- Educational support services (such as regulatory inspectorates, Welsh government);
- Sponsors and donors if you are a scholarship student and have given permission;
- Prospect research and due diligence suppliers whom we outsource work to support with our fundraising;
- Suppliers such as Kbase Connect Limited and SMARTThing who manage our donation page and integrate our database with other sites we use to collect data such as Eventbrite, iSAMS, Zoom, online contact details form;
- Suppliers who support to create timetables for students and staff;
- Estyn/ CIW/ Home Office/ Office for National Statistics - audit purposes;
- Delivery partners for summer programmes;
- Police (if required) and the government for voting as legally required;
- Government agencies such as the Home Office and HMRC for employment and Gift Aid claims;
- Charity Commission;
- Fraud prevention agencies, money laundering agencies, and other professional associations;
- and;



- Regulators and law enforcement agencies, including the Police, HM Revenue and Customs, or any other relevant authority who may have jurisdiction
- Insurers;
- Office of National Statistics;
- For staff, pension providers, healthcare providers, payroll provision, previous employers for reference checks and other approved suppliers (professional membership etc);
- For Governors, to assist in our governance processes and meet the statutory requirements of Companies House, the Charities Commission and Education Acts and regulations and any other statutory duties upon us;
- For Governors, we may need to share your details with companies like Stripe and PayPal so the organisation can undertake due diligence on UWC Atlantic to allow us to process online donations.

4.5 United World College of the Atlantic Limited will share personal data with law enforcement or other authorities, as detailed above in 4.4, if required by law.

## 5.0 Data Minimisation

5.1 United World College of the Atlantic Limited always ensures the personal data we are processing is:

- Adequate – sufficient to properly fulfil our stated purpose;
- Relevant – has a rational link to that purpose; and is
- Limited to what is necessary – we do not hold more than we need for that purpose.

The UK GDPR does not define these terms. As this is the case, United World College of the Atlantic Limited accepts these terms may have a differing definition from one individual to the other, as the processing will depend on the specified purpose for collecting and using the personal data.

5.2 In order to assess whether we are holding the right amount of personal data, we demonstrate clearly why we need it, before any data processing activities take place.

5.3 For special category data or criminal offence data, we understand the importance of collecting and retaining only the minimum amount of information.

5.4 United World College of the Atlantic Limited undertakes an annual data protection audit with an external certified data protection service provider, to review our personal data processing, and to check that the personal data we hold is still relevant and adequate for the stated purposes.

## 6.0 Accuracy

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6.1 United World College of the Atlantic Limited will take all reasonable steps to ensure the personal data we hold is accurate and up to date.

6.2 United World College of the Atlantic Limited will take reasonable steps to ensure that personal data we hold is not incorrect. This may involve contacting you via our official communication channels, to ensure all personal data held is accurate.

6.3 United World College of the Atlantic Limited will always record the source of where personal data came from and ensure the source is compliant with UK privacy laws, including the UK GDPR.

6.4 If we need to keep a record of a mistake, we clearly identify it as a mistake, and add this to our records of processing for audit purposes and continuous improvement.

6.5 All of United World College of the Atlantic Limited's records clearly identify any matters of opinion, and where appropriate whose opinion it is, and any relevant changes to the underlying facts.

6.6 United World College of the Atlantic Limited will comply with the individual's right to rectification, and carefully consider any challenges to the accuracy of the personal data.

6.7 As a matter of good practice, we keep records of processing of any challenges to the accuracy of the personal data.

## **7.0 Storage Limitation and Deletion**

7.1 United World College of the Atlantic Limited will not keep personal data for any longer than is necessary to fulfil the original stated purpose for the processing of such personal data.

7.2 United World College of the Atlantic Limited will only keep personal data for the period outlined to meet the requirements of the contract, legal obligation, or legitimate interest identified.

7.3 Any retention of personal data will be carried out in compliance with legal, professional body, and regulatory obligations. These data retention periods are subject to change, due to any revisions of associated legislation, regulations, or requirements.

7.4 United World College of the Atlantic Limited acknowledges that UK privacy legislation does not determine how long personal data needs to be kept. This is up to the data controller to determine and document accordingly at the earliest possible opportunity.

7.5 United World College of the Atlantic Limited has a personal data retention and deletion policy in place, which documents the types of record or information we hold, what we use it for, and how long we intend to keep it.

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7.6 United World College of the Atlantic Limited periodically reviews the personal data we hold, and erases or anonymises it, when we no longer need to process it for the original purpose.

7.7 United World College of the Atlantic Limited also considers any challenges to the retention of personal data. We understand that individuals have a right to erasure of data if we no longer need the personal data.

7.8 United World College of the Atlantic Limited acknowledges there are exceptions to retention periods. Here we can keep personal data for longer if we are only keeping it for public interest archiving, scientific, or historical research, or statistical purposes. We would always inform you if this was the case, along with our lawful basis for retention.

7.9 When United World College of the Atlantic Limited is provided with an instruction to destroy data which must be destroyed irretrievably either in paper or electronic formats. Paper records will be destroyed by an approved contractor who can provide evidence of destruction and a certificate of destruction. United World College of the Atlantic Limited will retain this certificate.

7.10 United World College of the Atlantic Limited also has secure destruction procedures and processes for any of the devices it has used for the storage of personal data. United World College of the Atlantic Limited will retain evidence of any equipment destruction and confirm that the destruction is beyond any prospect of retrieving data stored within the device.

## **8.0 Data Transfer and Confidentiality (Security)**

8.1 United World College of the Atlantic Limited will undertake an analysis of the risks presented by our personal data processing and use this to assess the appropriate level of security we need to put in place. We review our Business Continuity Plan (BCP) annually.

8.2 We have an information security policy and take steps to make sure the policy is implemented. For example, we undertake an annual information security review with an accredited external provider. We make sure that we regularly review our information security policies and measures and, where necessary, improve them.

8.3 United World College of the Atlantic Limited makes sure that we can restore access to personal data in the event of any incidents, such as by establishing an appropriate backup process.

8.4 United World College of the Atlantic Limited conducts regular testing and reviews of our measures to ensure they remain effective, and act upon the results of those tests where they highlight areas for improvement.

8.5 Where appropriate, we implement measures that adhere to an approved code of conduct or certification mechanism, such as Cyber Essentials certification, and additional quality standards.

8.6 We ensure that any data processor we use also implements appropriate technical and organisational measures.

8.7 United World College of the Atlantic Limited does not use tracking cookies on our website to track user behaviour and/or improve site experience. The UK GDPR and PECR interprets data collected by cookies as personal. It prohibits the collection of personal data without consent, which means a website is only allowed to collect information that the user voluntarily inputs. This includes name, email address, phone number, or any other information that the user shares with the website. The cookie consent must be freely given, specific, informed, and unambiguous.

## 9.0 Accountability

9.1 Accountability is one of the UK GDPR data processing principles. United World College of the Atlantic Limited takes our responsibility for complying with the UK GDPR very seriously, as documented by this privacy notice.

9.2 United World College of the Atlantic Limited has put in place several measures that we can, and in some cases must take, including:

- adopting and implementing data protection policies and procedures;
- taking a 'data protection by design and default' approach;
- putting written contracts in place with those whose personal data we control and process;
- maintaining documentation of our processing activities;
- implementing appropriate security measures;
- recording and, where necessary, reporting personal data breaches;
- carrying out data protection impact assessments for uses of personal data that are likely to result in high risk to individual's interests;
- ensuring United World College of the Atlantic Limited employees receive annual UK GDPR and privacy legislation training;
- appointing a data protection officer;
- undertaking annual data protection and information governance audits; and
- adhering to relevant codes of conduct and signing up to certification schemes (where applicable).

9.3 United World College of the Atlantic Limited understands that accountability obligations are ongoing. We review and, where necessary, update the measures we have put in place. For example, we continually enhance our privacy management framework, as this can help embed our accountability measures and create a culture of privacy across our organisation.

9.4 United World College of the Atlantic Limited understands that being accountable can help build trust with individuals and may help mitigate any gaps in compliance, and thus any potential regulatory enforcement action.

9.5 If you have any questions or concerns about how we process and protect your personal data not covered in this privacy notice please contact United World College of the Atlantic Limited by telephone on +44(0)1446 799000 or via email at [enquiries@uwcatlantic.org](mailto:enquiries@uwcatlantic.org).