



# The Worshipful Company of Educators

(Incorporated by Royal Charter)

## Data Protection – Members’ Privacy Notice

### 1. Introduction

This Privacy Notice sets out the way the Company and Trust processes your personal information and has been created to ensure you know how we use your data as a Liveryman, Freeman, Companion or Associate. The Worshipful Company of Educators (WCoEd) and the Educators’ Trust (EdT) are ‘data controllers’ of your personal data and are subject to the Data Protection Act and the General Data Protection Regulation (GDPR). The Clerk acts as the Company’s Data Protection Officer and fulfils a number of roles, one of which is to be the primary and independent point of contact for data protection matters. More information on GDPR is available on the Information Commissioner’s Office web site. <https://ico.org.uk/>

### 2. The types of information we collect

- Contact and communication information including your contact details (e.g. email addresses, telephone & mobile numbers, postal addresses).
- Details of your biography professional qualifications and associations.
- Membership and donation payment information.
- Limited special data (e.g. food allergies, accessibility arrangements, health issues) so that we can cater for your needs at WCoEd events and ensure your welfare.
- Certain other information which you volunteer to WCoEd & EdT (e.g. interests, connections).

### 3. How we collect your information

We collect your personal information in a few limited ways:

- Directly from you on completing an application form and providing associated details, on your entry on Educators Members’ Database (EMDb/our database), and as part of your progression through the Company.
- Directly from you when you make bookings through EMDb/our database, or interact with us (e.g. when attending events).
- On rare occasions when we might receive information from another organisation (e.g. a professional body) or another Member of the Company.
- Images of you, you place on (EMDb/our database), that are provided for our website and publications from events attendance, via recordings of on-line events and other presentations.
- Through your responses to emails.

### 4. How we use personal information

Personal information collected and processed by WCoEd & EdT will be for the following purposes:

- Administration of membership.
- Administration of events.
- Administration of any donations or legacies.
- Advising you of events or activities organised by WCoEd & EdT, or by members or by other livery companies that we think will be of interest to you.
- Fulfilment of orders for goods and services.
- Research and statistical analysis for the benefit of the WCoEd & EdT.

### 5. The way we store your information

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Data is held and backed up in the ‘cloud’ securely. Key data is also encrypted with access to the EMDb/our database password protected. Hard copy data is held securely in the Company Office. Some data processed by officers and approved volunteers is held on personal computers (e.g. on events,

buddying) and is also subject to similar procedures and safeguarding. We are seeking over time to reduce this type of storage.

## **6. Your 'marketing' and communication preferences**

WCoEd & EdT will always act upon your wishes in respect of what type of communications or "marketing" you wish to receive and how you wish to receive them, as expressed in your consent form. There are some communications we need to send you regardless and to fulfil our obligations to you as Members of the Company (e.g. Quarterage requests, AGM & EGM notices, events information and *The Educator*).

## **7. Sharing your information with others**

We will not sell, distribute or lease your personal information to other organisations unless we have your permission or are required by law to do so. We do share your information in the following cases:

- (*Liverymen only*) for the purpose of completion of the Common Hall Register for the City of London Corporation.
- WCoEd & EdT governing bodies (Court, Officers, Trustees, etc) for the purpose of Company governance and operation.
- The Company's employees and member volunteers for the purpose of administering your membership and giving you access to the full range of membership activities benefits to which you are entitled.

Under strict obligations of confidentiality, we may be required to share information with:

- Our contractors (e.g. auditors, accountants).
- Our advisers (e.g. lawyers).
- HMRC or other statutory body.

If such commercial third parties require access to members' information, we will always have complete control of what they see.

Other parties, including other members, requesting information about a member will not be able to acquire such information unless permission has been explicitly granted by that member.

For contact information shared between members, permission is normally controlled through the EMDb/our database and permission record lodged there. Members must NOT use personal information provided to them via the Company for personal or financial gain – its use is for Company purposes only as detailed above in para 4. "How we use personal information". Misuse use of personal information may be deemed good cause for termination of membership.

Outside the Company, other parties wishing to contact a Member will have details taken of the query, which may be passed on to that Member by the Clerk at his discretion, allowing the Member to respond if required.

## **8. How long information is kept**

We hold your information only as long as necessary for each purpose we use it. As a relatively new Livery Company this matter is kept under review as our processes develop over time. For most membership data, we expect to retain it for life (Freedom of the Company being for life). Thus, basic details, (e.g. name and dates of membership), are retained indefinitely for historic/archival purposes.

## **9. Your rights and Complaints**

You have the right to ask us in writing for a copy of the personal data held about you (this is known as a 'Subject Access Request'). A copy will be sent to you as soon as reasonably possible after your request.

Under the law you have the following rights:

- To require WCoEd & EdT not to send you 'marketing' communications.
- To require that we cease processing your personal data if the processing is causing you damage or distress.
- To require us to correct the personal data we hold about you if it is inaccurate.
- To request that we erase your personal data.
- To request that we restrict data processing activities.
- To receive from us the personal data we hold about you, which you have provided to us.
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply: e.g. if we can show our processing is necessary for a lawful purpose set out in this Privacy Notice.

If you wish to make a complaint you may contact the Clerk at the Company office:

You can find out more about your rights under applicable legislation from the Information Commissioner's Office website:  
[www.ico.org.uk](http://www.ico.org.uk)

## **10. Updating & amending your personal information**

We request that new members provide us with the personal data we require and that they also complete the WCoEd & EdT Personal Data Consent Forms. The WCoEd & EdT will always try to keep your personal data as up-to-date as possible. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email the Clerk as soon as possible, at the address below. We will promptly correct any information found to be incorrect.

You can correct your own core personal information withing the EMDb/our database, such as contact information, through the web-based portal where key personal data is available to view and edit. Please note you will require a username and password to access EMDb/our database.

You may formally request details of personal information which we hold about you, under provisions of the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please contact the Company office directly:

[clerk@co-educators.com](mailto:clerk@co-educators.com)

## **11. Website and cookies**

With their permission, some personal information about members, (e.g. photographs, position within the Company, ) is displayed on our public website. We also use cookies to monitor website use.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual.

The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **12. Changes to the privacy notice**

We will keep our privacy policy under regular review and hold it on our Company web page. This privacy policy was first approved 25th September 2020 and is due for review and updated in December 2021.