

CAREERS WALES

CLIENT PRIVACY NOTICE

Date Created:	22/5/18
Version:	1.0
Review Date:	22/5/19

Introduction

Welcome to CAREER CHOICES DEWIS GYRFA LTD's ('Careers Wales') privacy notice.

Careers Wales respects your privacy and is committed to protecting your personal data. This privacy notice will tell you:

- ✓ how we look after your personal data when you visit our website www.careerswales.com (regardless of where in the world you visit it from); and
- ✓ how we look after your personal data generally (so looking at your personal data and how it is used in ways that do not involve our website); and
- ✓ about your privacy rights and how the law protects you.

To make this privacy notice as easy to understand as possible, you can either click on the link below to take you to particular information that you are interested in, or you can keep reading through the whole document. If you are not sure what we mean by particular words or phrases, you can use the "Glossary" below which will help you understand the meaning of some of the terms used in this privacy notice.

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1 IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how Careers Wales collects and processes your personal data through your use of our website www.careerwales.com and your use of our services generally, including any data you may provide when you:

- ✓ sign up to our services;
- ✓ chat with one of our Careers Advisers;
- ✓ sign up to our newsletter;
- ✓ take part in a competition;
- ✓ take part in a quiz; or
- ✓ provide us with feedback.

It is important that you read this privacy notice together with any other privacy notice we may give you on specific occasions when we are collecting or processing personal data about you. Reading our privacy notices will help you understand how and why we are using your data.

Controller

Careers Wales is the controller and is responsible for your personal data. In this privacy notice, wherever the words "**we**", "**us**" or "**our**" are used they refer to Careers Wales.

We take our duties to look after your personal data seriously. To help us look after your personal data, we have appointed a member of our staff as a Data Privacy Manager to oversee your questions relating to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights* ([see below](#)), please contact our Data Privacy Manager using the contact details set out below:

Contact details

Our full details are:

Full name of Careers Wales: CAREER CHOICES DEWIS GYRFA LTD

Name of Data Privacy Manager: Paul Powell

Email: personal.data@careerswales.com

Postal Address: 53 Charles Street, Cardiff, Wales, CF10 2GD

Telephone number: 0800 028 4844

We want to let you know that if you are unhappy about something relating to your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**). The ICO is a government body that supervises data protection issues in the UK. You can find out more information about the ICO by visiting its website (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please [contact our Data Privacy Manager](#), and tell us why you are unhappy before contacting the ICO.

Our Data Protection Officer

Because we are a public body, we have also appointed a data protection officer (**DPO**) to help us look after your data. Our Data Privacy Manager will speak to our DPO wherever he is required to by law. Contact details for our DPO are set out below:

Name of our DPO: Acuity DPO Limited (a company owned by Acuity Legal Ltd)

Address of our DPO: 3 Assembly Square, Cardiff, CF10 4PL, UK.

Your duty to inform us of changes to your personal data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. An example of when your personal data may change may be when you move house, when you move school / college or when you change your contact details such as your email address.

Third-party links

When you use our website www.careerswales.com, it may include links to other websites that we do not own or control (**third party websites**). Clicking on those links may allow those third party websites to collect or share data about you. When you leave our website, we encourage you to read the privacy notice of every website you visit. This will help you understand how those third-parties use your personal data.

2 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to be able to collect, store and use this type of personal information for the services we provide.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- ✓ **Identity Data** includes first name, last name, title, date of birth, gender, national insurance number and any username used by you on our website. Whenever you visit our offices we capture data about you through our CCTV that is installed onsite.
- ✓ **Contact Data** includes home address, email address and telephone numbers.
- ✓ **Education and Career Data** includes details about your status (whether you are at school, college or in employment or looking for employment), details of the school or college that you attend, details of any employer you may have, details of any qualifications that you may have or that you are working towards, any preferences that you may have about your education or future career, the Local Authority that is responsible for you, details of any special educational needs you may have, details of any disability that you may have, details of whether you are entitled to free school meals and details of the language you prefer to speak and write in, details on school attendance records, your Unique Learner Number and your Unique Pupil Number.
- ✓ **Technical Data** includes your internet address (IP address), your login data and details of the computers and mobile phones you use to access our website.
- ✓ **Profile Data** includes your username and password used on our website, your interests, your preferences (including preferences about your education, future career and the language you prefer to speak and write in), feedback and survey responses.
- ✓ **Usage Data** includes information about how you use our website and our services.

- ✓ **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and how you prefer to receive that information.
- ✓ **Special Category Data** includes details of your race or ethnicity, details about any religion you may have, information about any special educational needs that you may have, information about any disability you may have, information about any criminal convictions or offences you may have. We have included references to some of this special category personal data in the above groups of information, but we have set them out separately here so you can understand what they are.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to provide you with help and assistance (for example, we may not be able to provide you with careers guidance). Should this situation happen, we will tell you.

3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you. To help make it easier for you to understand what data we collect and how we collect it, we have set out some examples in the table below:

Method of collecting data:	Examples of how we collect data this way:	What data do we collect this way:
<p>Direct interactions:</p> <p>When you:</p> <ul style="list-style-type: none"> ✓ fill in forms, ✓ contact us by post, ✓ contact us by phone, ✓ contact us by email, or ✓ have contact with us in person, <p>we collect personal data about you.</p>	<p>You provide us with personal data when you:</p> <ul style="list-style-type: none"> ➤ ask Careers Wales to provide you with help and support; ➤ meet with your Careers Wales Careers Adviser; ➤ create an account on our website; ➤ subscribe to our service or publications; ➤ request marketing to be sent to you; ➤ enter a competition, quiz, promotion or survey; or ➤ give us some feedback. 	<ul style="list-style-type: none"> ➤ Identity Data ➤ Contact Data ➤ Education and Career Data ➤ Technical Data ➤ Profile Data ➤ Usage Data ➤ Marketing and Communications Data ➤ Special Category Data

Method of collecting data:	Examples of how we collect data this way:	What data do we collect this way:
<p>Use of our website:</p> <p>As you use our website, we may automatically collect data about your computer / mobile phone equipment and how you use and view our website.</p>	<p>We collect this personal data this way by using:</p> <ul style="list-style-type: none"> ➤ Cookies; ➤ server logs; and ➤ other similar technologies. <p>Please see our <i>cookie policy</i> for further details.</p>	<ul style="list-style-type: none"> ➤ Technical Data ➤ Profile Data ➤ Usage Data

Method of collecting data:	Examples of how we collect data this way:	What data do we collect this way:
<p>Third parties or publicly available sources:</p> <p>We may receive personal data about you from various third parties and public sources.</p>	<p>We may collect Technical Data and/or Usage Data from the following parties:</p> <ul style="list-style-type: none"> a) analytics providers such as Google based outside the EU; and b) advertising networks. <p>We collect Identity Data, Contact Data, Education and Career Data and Special Category Data from the following third parties:</p> <ul style="list-style-type: none"> a) Welsh Government and other public bodies who are interested in careers and education services; b) Local authorities; c) Schools and colleges; d) Training providers; e) Employers. 	<ul style="list-style-type: none"> ➤ Technical Data ➤ Usage Data ➤ Identity Data ➤ Contact Data ➤ Education and Career Data ➤ Special Category Data

4 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ✓ Where we need to provide careers and education advice and guidance to you (ie we have a contract).
- ✓ Where it is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority of Careers Wales.
- ✓ Where it is necessary for our legitimate interests (or those of a third party) and your personal rights do not override those interests.
- ✓ Where we need to comply with a legal or regulatory obligation.

We will only use your Special Category Data when the law allows us to. Most commonly, we will use your Special Category personal data in the following circumstances:

- ✓ In limited circumstances, with your explicit written consent.
- ✓ Where it is needed in the public interest, such as to support you in making decisions about your education and career, for equal opportunities monitoring and to address inequality.
- ✓ Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting our Data Privacy Manager](#) or clicking “unsubscribe” on any marketing emails or texts that you may receive from us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data and the legal reasons why we use your personal data in this way.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact our Data Privacy Manager](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client of Careers Wales.	(a) Identity Data (b) Contact Data (c) Education and Career Data (d) Profile Data (e) Marketing and Communications Data (f) Special Category Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) To carry out a task in the public interest
To provide you with: ✓ careers guidance / support ✓ educational guidance / support	(a) Identity Data (b) Contact Data (c) Education and Career Data (d) Profile Data (e) Marketing and Communications Data (f) Special Category Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) To carry out a task in the public interest
Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate

		interest
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> ✓ Telling you about changes to our terms or privacy policy ✓ Asking you to leave a review or take a survey ✓ Inviting you to take a quiz 	<ul style="list-style-type: none"> (a) Identity Data (b) Contact Data (c) Education and Career Data (d) Profile Data (e) Usage Data (f) Marketing and Communications Data (g) Special Category Data 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) To carry out a task in the public interest (d) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
<p>To enable you to take part in a prize draw, quiz, competition or complete a survey</p>	<ul style="list-style-type: none"> (a) Identity Data (b) Contact Data (c) Education and Career Data (d) Profile Data (e) Usage Data (f) Marketing and Communications Data 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) To carry out a task in the public interest (C) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business and our website (including making sure our IT systems work properly).	(a) Identity Data (b) Contact Data (c) Education and Career Data (d) Technical Data (e) Profile Data (f) Usage Data (g) Marketing and Communications Data (h) Special Category Data	(a) Necessary to comply with a legal obligation (a) To carry out a task in the public interest (c) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To deliver relevant website content and adverts to you.	(a) Identity Data (b) Contact Data (c) Technical Data (d) Profile Data (e) Usage Data (f) Marketing and Communications Data	(a) To carry out a task in the public interest (b) Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website and the services we offer.	(a) Technical Data (b) Profile Data (c) Usage Data	(a) To carry out a task in the public interest (b) Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Education and Career Data (d) Technical Data (e) Profile Data (f) Usage Data (g) Marketing & Communications Data (h) Special Category Data	(a) To carry out a task in the public interest (b) Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We want to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity Data, Contact Data, Education and Career Data, Technical Data, Profile Data and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have:

- ✓ requested information from us; or
- ✓ have signed up to receive our services; or
- ✓ if you provided us with your details when you entered a competition, quiz or registered for a promotion

and in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by [contacting our Data Privacy Manager](#) at any time] or by unsubscribing from any marketing emails or texts that you may receive.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any service that we may have provided to you (such as careers and education advice).

Cookies

We use cookies on our website. If you want further information please see our *cookie policy*.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please [contact our Data Privacy Manager](#) if you want further information about this.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this privacy notice, where this is required or permitted by law.

5 WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with External Third Parties as set out in the [Glossary](#).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6 INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

We do not transfer your personal data outside the European Economic Area (EEA).

7 HOW WE KEEP YOUR PERSONAL DATA SAFE

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those of our employees who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 HOW LONG WE KEEP YOUR PERSONAL DATA FOR

How long will you use my personal data for?

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting our Data Privacy Manager](#).

In some circumstances you can ask us to delete your data: [see Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes or for reporting information to our funders in which case we may use this information indefinitely without further notice to you.

9 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- ✓ [Request access to your personal data.](#)
- ✓ [Request correction of your personal data.](#)
- ✓ [Request erasure of your personal data.](#)
- ✓ [Object to processing of your personal data.](#)
- ✓ [Request restriction of processing your personal data.](#)
- ✓ [Request transfer of your personal data.](#)
- ✓ [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact our Data Privacy Manager whose [contact details](#) are set out above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10 GLOSSARY

<u>Lawful Basis</u>		
	Legitimate Interest:	means the interest of Careers Wales in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Legitimate interests do not apply where we are acting in our capacity as a public body. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our Data Privacy Manager.
	Performance of Contract:	means processing your data where it is necessary for the performance of a contract to which you are a party or to take

		steps at your request before entering into such a contract.
	Comply with a legal or regulatory obligation:	means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that Careers Wales is subject to.
	Carry out a task in the public interest:	means processing your personal data where it may be needed in the public interest, such as to support you in making decisions about your education and career, to help address inequality and for equal opportunities monitoring.
<u>Third parties</u>		
	External third parties:	<ul style="list-style-type: none"> ✓ Welsh Government and other government agencies involved in education and careers services; ✓ Your Local Authority, school and / or college; ✓ Businesses that may take you on work experience placements; ✓ Your employer; ✓ Training Providers; ✓ Service providers acting as processors based in the UK who provide IT and system administration services; ✓ Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services; ✓ Our outsourced DPO (Acuity DPO Limited); ✓ HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances; ✓ Funders of Careers Wales (ie European funding

		<p>agencies) and their auditors;</p> <ul style="list-style-type: none"> ✓ Marketing and market research agencies; and ✓ Other organisations that we may transfer our business to or merge with from time to time.
<u>Your legal rights</u>	You have the right to:	
	(1)	Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
	(2)	Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
	(3)	Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

	(4)	Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
	(5)	Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
	(6)	Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
	(7)	Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.