

# Privacy Policy

**Partners-in-Learning Limited Trading as Head for Change** (Company Registration Number: 7032159 referred to hereafter as (“Head for Change”) (“**us, we, our**”) maintain a policy of strict confidence concerning your (“**you, your**”) personal data (“**Privacy Policy**”). This Privacy Policy has been developed in accordance with the *Data Protection Act 1998* (“**DPA**”). The Privacy Policy applies to the collection, storage, use and dissemination of your personal data by us. The term “personal data”, as used in this Privacy Policy, is as defined under the DPA and includes any personal information that you might supply to us (or that might be collected from you) by accessing this site [www.head-for-change.net](http://www.head-for-change.net) (“**Site**”), the platform (“**Platform**”) or otherwise. This Privacy Policy applies to information provided to us whether via the Site, the Platform or any other means.

By your use of the Site and/or the Platform you consent to the collection, storage, use and disclosure of your personal data in accordance with this Privacy Policy and as otherwise permitted under the DPA.

Although we will comply with this Privacy Policy in respect of personal data provided to us by persons under the age of 16 years, those persons must obtain the consent of a parent or guardian prior to using the Site and/or the Platform and the parent or guardian will be responsible for appropriately supervising the person’s use of the Site and/or the Platform.

For the purposes of the DPA, the data controller is "Head for Change Limited. If you have any further questions or if you wish to receive further details on our information practices and Privacy Policy, please contact our Privacy Officer using the method set out below.

## Collecting personal information

The personal data you provide to us is collected to enhance your use of the Site and the Platform, to improve the Site and the Platform, and to keep you informed of our products and services that might be relevant to you. It is also collected to allow us to provide the functions and services offered on the Site and the Platform to you.

Other personal data we collect from you is for the purpose of providing our services. The types of personal data we collect from you includes your contact details such as name, email address, phone number, job title, student or staff group, and institution name. We will generally collect personal data directly from you. We may collect your personal data in any of the following ways:

- when you log on and access the Platform;
- when you access our Site and provide your personal data;
- during conversations and/or correspondence between you and the "Head for Change team;
- when you complete a transaction with us;
- when you otherwise elect to provide personal data to us; or
- from third parties such as your institution.

## Cookies

When you visit the Site we may attach a “cookie” to your computer’s memory. This “cookie” is a small text file which assists us to store session information when you are logged into the Site and to facilitate seamless access between our different services. The cookie will expire after 1 day.

If you choose to do so, you should be able to configure your computer so that it disables “cookies” or does not accept them, however, this may impact the functionality of the Site.

## Use and disclosure of information

If we have obtained your personal data through your use of the Platform (for example, when you log-on to use the Platform) or from your institution in connection with your use of the Platform, your personal data will be securely stored by us and not used for any purpose other than to enable your continued use of the Platform.

We will not disclose your personal data to any third party other than in accordance with this Privacy Policy. In order to provide our services, we may disclose your personal data to other organisations but only to allow them to assist us in providing our services to you. We take reasonable steps to ensure that these organisations comply with technical and organisational security measures required to protect your personal data.

## **Accuracy of your information**

We take all reasonable steps to ensure that your personal data held by us is accurate and up-to-date. If you believe that any of your personal data is inaccurate, please contact us using the method set out below and we will take all reasonable steps to correct it within a reasonable time.

## **Third Parties and your information**

We will only collect, store, use or disclose your personal data as set out in this Privacy Policy and where we are required by law to protect our rights or property (or those of any third party), or to avoid injury to any person.

## **Storage and security**

We will use all reasonable endeavours to keep your personal data in a secure environment, however, this security cannot be guaranteed. Our security measures include tiered access to the Platform, password access for administration accounts that are changed regularly and use of encryption software for traffic on the Site and the Platform, and recording systems of access to the Platform. These security measures are designed to ensure your personal data is not subjected to unauthorised access, loss or misuse. If you reasonably believe that there has been unauthorised use or disclosure of your personal data please contact us using the method set out below.

If we no longer need your personal data, unless we are required under English law or a court or tribunal order to retain it, we will take reasonable steps to de-identify your personal data or destroy your personal data securely.

## **Variation and consent to variation**

We may vary the terms of this Privacy Policy at any time. You should check this Privacy Policy regularly so that you are aware of any variations made to this Privacy Policy. You will be deemed to have consented to such variations by your continued use of the Site and/or the Platform following such changes being made.

## **Access to information we hold about you**

You have a right to ask us to provide a copy of the personal data we hold about you. If you request access to your personal data we hold about you, you must do so in accordance with the DPA. We will respond to your request within a reasonable period of time and, where reasonable and practicable, give access to the information in the manner you request (for which we may charge a small administration fee). You may request a copy of your personal data by writing an email to:

Privacy Officer

[inquiry@head-for-change.net](mailto:inquiry@head-for-change.net)

## **Making a complaint**

If you would like to make a complaint in relation to how we have handled your personal data, please contact our Privacy Officer using the method set out above, with a written summary of your relevant complaint.

We will investigate your complaint and will endeavour to provide you with a written response within 30 days of receiving your complaint.