

Privacy policy

The Haberdashers' Aspire Programme (the "Programme") provides careers advice and mentorship to Sixth Form students by linking them with a personal mentor recruited from the alumni of Haberdashers' schools nationally and internationally and from the wider Haberdashers' family.

As part of running the Programme, we collect and store personal information about you. We are committed to protecting and respecting your privacy and this policy sets out what information we collect about you, where and how we use it.

We also maintain a database of alumni, friends and supporters in order to stay in touch with our community and keep you updated about news, events, careers initiatives and fundraising activities.

For the purposes of legislation covering data protection in the UK, the organisation responsible for the use of your personal data (the so called "Data Controller") is The Haberdashers Operating Company, Haberdashers Hall, 18 West Smithfield, London EC1A 9HQ ("we", "us", "our"). We are registered with the Information Commissioner's Office ("ICO") (registration number Z6285340).

If you have any questions about this policy or concerning your personal information, please contact Hugh Sadleir at hugh@haberdashers.co.uk

What type of personal data we collect

We collect a variety of personal data in order to help us deliver and quality assure the Programme, ensure the best possible match between mentors and mentees, measure the Programme's impact and ensure individuals are safeguarded. This includes:

Name

Gender

Contact details, including email address and residential address

Date of birth

School / education institution

Place of work, industry, and role

School history

Work history

Hobbies and interests

Skills and experience

Qualifications

Images and videos of you taken at Programme events

Content of conversations and messages between mentors and mentees

Geo-location data (your geographical location based on your IP address)

Log-ins and activity on the Programme website

Consent options and communication preferences

Other information that you choose to provide to us, including via open text boxes

Certain types of personal data are considered by data protection law to be more sensitive than others. This includes “special category personal data” (information relating to your health, racial or ethnic origin, details of sexual life, sexual orientation, religious beliefs, political opinions or any genetic or biometric data that is used to identify you) and “criminal offences and conviction data”.

Given the nature of the Programme, we may process special category data about you [where you choose to share this with us], such as:

Ethnicity

Information about your physical and / or mental health

How we collect your information

We collect personal information when you:

visit this website

create or update your online profile

contact us in any way including online, email, phone, social media

take part in an event.

How we use your information

We will always use your personal information with an appropriate legal ground. The main reasons why we use your data include:

administering the Programme

facilitating the matching process between mentors and mentees and ensuring the best possible match, for example by displaying your name as a list of potential ‘matches’

quality assuring the Programme

measure the Programme’s impact

safeguarding individuals on the Programme platform

facilitating the running of Programme events and the sharing of images and videos taken at Programme events

providing you with information or updates that you have asked for

sending you communications that may be of interest

seeking your views so that we can make improvements

updating our database records and ensuring we know how you prefer to be contacted

analysing your engagement with the Programme

featuring you in our promotional materials for marketing and fundraising purposes.

Failure to provide personal data

When we collect personal information, we will make it clear whether you are required by law, or under a contract, to provide your personal data, and what will happen if you do not provide that data.

Our legal basis for processing your information

Depending on the purposes for which we use your data, we may rely on one or more of the following lawful bases:

It may be necessary for us to use your information to comply with our legal obligations.

It may be necessary for us to use your personal data for the purposes of our “legitimate interests” or those of a third party. Where we are relying on this basis, we only do so where your interests do not override ours.

Where you have provided your consent for us to use your personal data.

Special category data and criminal offence data is more sensitive and so we also need to identify an additional condition to allow us to use this type of information, for example:

If it is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity (for example, providing information to a court where a claim has been made).

If it is necessary for reasons of substantial public interest, (for example, where this is necessary for the purposes of protecting the physical, mental or emotional wellbeing of an individual; to safeguard children and individuals at risk; or to ensure equality and opportunity of treatment).

Updating your consent preferences

If you click ‘unsubscribe’ at the bottom of one of our emails sent you will be automatically opted-out of these types of email communications in the future.

If you want to contact us about your consent preferences please contact us at aspire@haberdashers.co.uk.

How we keep your information safe

We understand the importance of keeping your personal information secure and take appropriate steps to safeguard it.

Your data is stored on a dedicated, secure cloud server hosted by Amazon Web Services (AWS) in the EU and managed by our website provider, ToucanTech. Industry standard firewalls, anti-virus, encryption and back-up methods are in place, as well as strict data handling protocols.

We always ensure only authorised persons have access to your information, which means only our approved employees and contractors, and that everyone who has access is appropriately trained in data management.

If you have an online profile you are responsible for keeping your login details confidential and we ask that you do not share your password with anyone.

No data transmission over the internet can be guaranteed to be completely secure. So, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

Who has access to your information

We will only share your personal data with third parties where the law allows us to, for example

Education providers within the Haberdashers family, such as schools which run Sixth Forms attended by Programme mentees.

Third parties who provide services for us, for example mailing and marketing.

Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event.

Web hosting, email hosting, analytics and search engine providers that enable us to run our community database and improve our website and its use

Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another business. In such event, we will take steps to ensure your privacy rights will be protected by the third party.

Our professional advisers, accountants, etc.

We take great care in selecting whom we share your data with. We provide third parties only with the information that is strictly necessary, and – if required - we have an agreement in place that requires them to protect your personal data to the same standard as we do.

Transfers of your personal data to other countries

For financial or technical reasons, we may need to transfer your personal data to countries outside the UK, which are subject to different data protection laws. We may do this where for example, we use suppliers in a third country or data is stored on servers outside the UK. We ensuring that any personal data transferred outside the UK continues to be protected as if it were being held in the UK.

If you would like more information about how we protect your personal data if it is transferred outside the UK please contact us via aspire@haberdashers.co.uk.

Keeping your information up to date

You can update your details directly on the Programme platform by clicking on 'My Settings' under your profile.

How long we keep your information for

We will only store your personal data for as long we need it to fulfil the purposes we collected it for.

Where we rely on your consent to contact you for direct email marketing, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for 2 years. We may periodically ask you to renew your consent. If you ask us to stop contacting you, we will keep a record of your contact details and limited information needed to ensure we comply with your request. If you ask us to remove your personal data from our database we will delete all the information we hold out apart from certain data we are allowed to retain by law.

Your rights

You have the following rights in relation to your personal data:

Right to be informed – you have a right to information about how we collect and use your personal data.

Right of access (commonly known as making a "subject access request"). You can ask us to confirm if we are holding your personal data, request a copy of your personal data and certain other information to check that we are processing your data lawfully.

Right to rectification – you can ask us to correct any information about you if you think it is wrong, or to update or complete information if you think it's incomplete.

Right of erasure – you can ask us to erase information about you in some circumstances although there might be reasons why we cannot do this.

Right to restrict our processing of your personal data – you can ask us to stop processing your personal data, for example if you want us to establish its accuracy or you're questioning our legal basis for processing it. This right only applies in certain circumstances.

Right to object – you can object to our use of your personal data in certain circumstances. Please note, you always have a right to object to processing of your personal data for direct marketing purposes.

Right to data portability – you can ask us to transfer your personal data to you or to another organisation free of charge and in a structured, commonly used format which is openly accessible to software (such as a CSV file). This right only applies where we hold your personal data to fulfil a contract or because we have gained your consent.

Some of these rights do not apply in all circumstances and we may be able to refuse or partially refuse requests in certain circumstances such as where a legal exemption applies. In most cases we have one month to respond to you. Occasionally, we may need to verify your identity before we are able to process a request. To exercise any of these rights, you should contact us at aspire@haberdashers.co.uk.

Automated decision-making and profiling

Automated decision-making is when a computer or similar electronic system uses personal data to make decisions about people without any human involvement.

Profiling involves collecting various pieces of information about a person in order to analyse or evaluate certain aspects relating to that person or to make predictions about them (for example, how that person may behave or what their preferences are).

We do not use your personal data in automated decision-making, including profiling (i.e. we do not make decisions about you by way of automated means without human involvement).

Your right to complain

If you believe that we have not complied with this policy or acted otherwise than in accordance with the law, please contact us at [details] and we will seek to resolve any issues.

You also have the right to make a complaint to the ICO if you are not happy with the way we are processing your personal data or the way we have responded to a request to exercise any of your rights. Details of how to do this can be found at <https://ico.org.uk/make-a-complaint/>.

Changes

This policy was last updated in [September 2024]. We will always publish the most up to date version on the Programme website. If we make a substantial change that affects your rights, we will notify you.