



Last updated Dec 2015 SH

## Transitions' Data Protection Policy

Transitions is committed to protecting personal information provided to us when candidates enquire with us and when anyone uses our services. This Policy relates to our use of any personal information provide to us online, via phone or text, by email, in letters or other correspondence.

Transitions London C.I.C. is registered with the Information Commissioner's Office as a Data Controller. Registration number: Z2789593

In order to keep you uptodate with our services we sometimes need to collect information about you. Transitions is committed to safeguarding your personal information. We are legally obliged to use your information in line with all laws concerning the protection of personal information, including the **Data Protection Act 1998** and our Data Protection Policy.

Transitions website may contain links to other websites owned and operated by third parties. These third party websites have their own privacy policies, including [cookies](#), and we urge you to review them. We cannot guarantee that the privacy policies of these websites meet our standards, and do not accept any responsibility or liability for the privacy practices of third party websites and your use of such websites is at your own risk.

This policy applies to anyone whose personal information is collected by Transitions; this includes both past and present staff and volunteers, candidates, customers and suppliers and anybody else who may supply data.

### **The Quality Standards and Evaluations Director takes full and final responsibility for:**

- Adopting the Data Protection Policy.
- Ensuring that all our staff and volunteers are fully aware of this policy.
- Ensuring that we meet all our legal responsibilities.
- Integrating the policy into our advice to all our clients.
- Ensuring that we are continuously updating our practices with the most recent information and guidance.
- Ensuring that **candidates, customers, employees and third parties** have the right to be informed that processing is being undertaken and know they have the right of access to

their personal information.

- Ensuring that candidates, customers, employees and third parties have the right to prevent processing in certain circumstances.

## **What and how information is collected**

When you participate in, access or sign up to any of Transitions' services, activities or online content, such as newsletters, telephone or text or social media we may receive personal information about you. This can consist of personal identifying information such as your name, email address, postal address, telephone/fax number, date of birth or place of work, country of origin, immigration status depending on the activity.

By submitting your details, you enable Transitions to provide you with the services, activities or online content you receive.

Please note that sometimes we will require you to provide additional personal information, and sometimes sensitive personal information in order to provide a service, activity or that meets your needs. When we do this we will provide further information as to why we are collecting your information and how we will use it.

We also use [cookies and collect IP addresses](#) from visitors to our website.

We will use your personal information for a number of purposes including the following:

- to provide our services, activities or online content and to deal with your requests and enquiries;
- to provide you with information about our services, activities or online content; and
- to analyse and improve the services offered by Transitions.

Where we intend to use your personal information for any other purposes, we will notify you first. You may withhold or withdraw your consent for the use of your personal information for purposes other than those listed above by making a request to the Quality Standards and Evaluations director. This may mean that you are no longer able to participate in Transitions' service.

## **Contact**

Transitions may contact you:

- in relation to any service or activity you have signed up for in order to ensure that we can deliver the services to you;
- where you have opted to receive further correspondence;

- to invite you to participate in surveys about Transitions' services (participation is always voluntary)

## **Information sharing**

Transitions will only release confidential information when required to do so by law or if the data subject specifically consents, for example sharing of information with other Transitions clients. Your information will only be used within Transitions or with our funders or with relevant organisations on your behalf, with your permission. Eg employers, professional bodies, colleges and other refugee agencies.

## **Information retention**

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in the contract of any service for which you are registered. When we no longer require your data it will be either anonymised for our project records or securely deleted.

## **Can I find out what personal information Transitions holds about me?**

Under the Data Protection Act, it is possible for an individual to request any personal data Transitions holds about them providing that proof of identity is supplied. Please request this from the managing director. We will try to respond within 5 working days.

## **Cookies and IP Addresses**

Cookies may be used by us to provide you with customised information from our web site. A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone browser when you visit a website and is stored on the device's hard drive.

Cookies allow us to see which pages have been viewed and how frequently they have been visited. Cookies also help us to make our website more user friendly. Most web browsers automatically accept cookies, however, you may set up your browser to notify you when you receive a cookie which will give you the opportunity not to accept it. If you disable cookies then you may not be able to access certain features of our website. When visitors leave comments on our website, they too get cookies stored on their computer so that they won't need to re-type all their information again when they want to leave another comment.

## **Our cookies include:**

- the user ID
- preferred time format (e.g. d/m/y)

- preferred template number (e.g. 1 for A4e design, 2 for FSI design)
- user's role (e.g. Advisor)
- user's full name (e.g. Joe Bloggs)
- redirect url (e.g. after login, you will be redirected to the home page)
- confirmation message (removed once displayed to the user)

An IP address is a number that can uniquely identify a specific computer or other network device on the internet and enables us to see where in the world people are accessing our site.

We use an analytical tool on website to track visitors' journeys through the sites for reporting reasons. The analytical tool uses cookies and IP addresses in order to provide meaningful reports about the visitors to our site, however, its cookies do not collect personal data about our website visitors and where IP addresses are tracked, they are not reported to Transitions.

## **KEY DATES**

ACTIVITY	DATES	PERSON RESPONSIBLE
Next Annual Policy review	December 2016 (reminder calendared)	Justin Brett, Quality Standards and Evaluations Director: Justin.brett@transitions-london.co.uk
This Annual Policy review:	January 2015	Justin Brett, Quality Standards and Evaluations Director: Justin.brett@transitions-london.co.uk

**Key Contact:**

Justin Brett, Quality Standards and Evaluations Director: [Justin.brett@transitions-london.co.uk](mailto:Justin.brett@transitions-london.co.uk)