



The International Centre for Leadership in Teaching & Learning

PRIVACY POLICY

OLEVI International Ltd provides professional development programmes for staff working in the education sector in partnership with Schools, Universities and Colleges. This privacy notice explains how we use any personal data we collect about you, the choices you have about what marketing you want us to send you, and your privacy rights and how the law protects you.

Data protection law will change on 25 May 2018

On 25 May 2018 the General Data Protection Regulation (2016) will come into effect, giving you more control over how your data is used and how you're contacted. This notice sets out most of your rights under the new laws. We will update this if any changes to our policies occur.

Our privacy promise

The company needs to keep certain information about its employees, clients, and suppliers for financial and commercial reasons and to enable us to monitor performance, to ensure legal compliance and for health and safety purposes. To comply with the law, your personal data must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. In practice, this means that only those who have a necessary and lawful need to access your data will be able to do so.

Data protection controller

To ensure the implementation of data protection the company has designated the Finance Manager as the company's data protection controller.

How the law protects you

OLEVI International Ltd understands that we must have a lawful basis in order to process your personal data, as outlined in Article 6 of the GDPR (2018). At least one of these must apply whenever we process your personal data:

- Consent: you have given clear consent for us to process your personal data for a specific purpose.
- Contract: the processing is necessary for a contract we have with you.

- Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- Legitimate interests: the processing is necessary for our legitimate interests.

What information we collect about you

Depending on our relationship with you, we may use your personal data in a number of ways:

Relationship with OLEVI	What data we collect about you	What we use your data for	Lawful basis
Staff and Directors	Contact Socio-demographic Financial Contractual and HR Documentary Data Identification number Consents	To manage our relationship with you To ensure we fulfil our obligations as part of our contract with you	Contract Legal basis
Associates and Suppliers	Contact Financial Contractual and HR Documentary Data Identification number Consents	To manage our relationship with you To contract you for work To ensure we fulfil our obligations as part of our contract with you	Contract Legal basis Consent
Delegates on one of our programmes	Contact Financial Equal opportunities information Consents Programme assessment and evaluation Documentary data	To manage our relationship with you and deliver our services To ensure you receive information about your programme. To provide you with support and guidance To respond to complaints and queries and aim to effectuate these To collect money for services	Contract Legal basis Consent
Newsletter Members, Associate Members & Facilitators	Contact Marketing preferences Consents	To provide you with insight and information on the education sector To manage our relationship with you and deliver our services To promote our products and services.	Consent Legitimate interest

The above information is on a lawful basis and a combination of consent, contractual, legal basis, and legitimate interest.

Categories of personal data

We collect several different categories of personal data from you, which are explained in more detail below:

Types of personal information	Details
Contact	Your contact details and name of Educational establishment.
Financial	Invoicing information
Contractual and HR	Information on your contract with OLEVI & HR information
Marketing preferences	Details about the products and services you would like to receive from us
Consents	Any agreement to use and process your data, usually regarding marketing.
Programme assessment and evaluation	Work completed as part of your qualification, and feedback and outcome.

We will only process special categories of personal data where the data subject has given explicit consent to the processing of those personal data for one or more specified purposes as outlined in Article 9 of the GDPR (2016).

Who we share your personal information with

We may share your data internally within OLEVI International Ltd where it is necessary for a specific purpose. There may be some instances where we share your data with our partner organisations (Jariram Ltd & EMLC) and third parties such as programme facilitators and assessors, funding or government bodies such as the Department for Education and Ofsted, our Data processors and any third parties that require us to share your personal data to fulfil our legal obligations such as auditors. We will never sell your information.

Marketing

We may contact you to ask your opinion, offer insight and research into the education sector and tell you about policy, funding and programmes we think are relevant to you. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, data we collect when you use our services, or from third parties we work with. We use this information to decide what may be relevant and of interest to you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

Whatever you choose, you'll still receive information relating to your existing programmes and services. We may ask you to confirm or update your choices if you start any new programmes or use our services in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

How long we keep your personal data

We will keep your personal information for as long as you are a service user or subscriber with OLEVI International Ltd. After you stop your contract with OLEVI International Ltd we may keep your data for up to 7 years for one of these reasons:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that apply to us
- To provide you with a reference for your engagement with OLEVI International Ltd.

You can ask to have your data removed earlier by contacting us.

How to get a copy of your personal information

You can request details about the personal data we hold on you by filling in a data request form and sending it to us at OLEVI International Ltd, 6-8 Gladstone Road, Farnborough, Kent, BR6 7EA, UK.

Letting us know if your personal information is incorrect

You have the right to query the accuracy of any data we have about you that you think is incorrect or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and update it.

What if you want us to stop using your personal information?

As a data subject you have the right to object to our use of your personal data, or to ask us to remove or stop processing it if there is no need for us to do so. This is known as the 'right to object' and 'right to erasure', also known as the 'right to be forgotten'.

We may sometimes be able to restrict the use of your data. This means that we are permitted to store your personal data, but not process it any further.

You can ask us to restrict the use of your personal information in the following circumstances:

- Where you contest the accuracy of the personal data, we will restrict the processing until you have verified the accuracy of the personal data
- Where you object to the processing
- When processing is unlawful and you oppose erasure and request restriction instead.
- If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim

Please contact us if you want to object to how we use your data or ask us to delete it or restrict how we process it.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so. This may mean that we cannot provide you with relevant information regarding our products and services. We will notify you if this is the case.

Future formats for sharing data

The Data Privacy laws will change on 25 May 2018. From that date you will have the 'right to data portability'.

This means that you can obtain and reuse your personal data for your own purposes across different services. We must provide the personal data in a structured, commonly used and machine-readable form. Open formats include CSV files. Machine readable means that the information is structured so that software can extract specific elements of the data. This enables other organisations to use the data.

This service will be free of charge.

How to contact us

For further information on how your information is used, how we maintain the security of your information, and your rights to access information we hold on you, please contact:

- by email: enquiries@olevi.com
- by telephone: 01689 605939
- or write to us at: OLEVI International Ltd, 6-8 Gladstone Road, Farnborough, Kent, BR6 7EA, UK

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern - <https://ico.org.uk/concerns/>