



## **Privacy Policy May 2018**

The Leonard Education Organization (LE•O) collects, processes, and uses information about individuals who come into contact with it, particularly its scholars, beneficiaries and partners, supporters and/or donors, and trustees, employees/staff, and volunteers. This information must be dealt with properly and securely and there are safeguards to ensure this in the European wide General Data Protection Regulations (GDPR). It is a legal requirement for LE•O to comply with the GDPR.

Please read this policy carefully.

### **PROCEDURES**

The following procedures have been developed in order to ensure that LE•O meets its responsibilities in terms of the GDPR. For the purposes of these procedures, data collected, stored, and used by LE•O falls into two broad categories: External data records of LE•O partners, supporters and/or donors, beneficiaries, students, alumni, etc., and internal data records of staff, volunteers, and trustees.

### **WHAT INFORMATION WE COLLECT AND WHY WE COLLECT IT**

LE•O obtains personal data and sensitive personal data from its partners, beneficiaries, students, alumni, supporters and/or donors, staff, volunteers, and trustees. This data is obtained, stored, and processed to assist the organization in its effective management and in the efficient running of services.

#### ***Information we collect from students, alumni, staff, volunteers, and trustees***

Contact details, CVs, application forms, references, photographs, and other documents.

#### ***Information we collect from supporters, donors, and partners***

Contact details and information about your relationship to LE•O.

### **HOW WE USE YOUR INFORMATION**

Personal data is collected using different types of methods such as phone, online, email, and direct interaction. No more data is collected than necessary for the purpose declared. Personal data will not be passed on to anyone outside the organization without your explicit consent unless there is a legal duty of disclosure under other legislation.

LE•O representatives will have access to it. The organization's email and database service providers may have access to some, mainly scholar, data as necessary. Service providers are bound by confidentiality arrangements to ensure that data is protected in accordance with this policy.

***How we use your information: LE•O students and alumni***

LE•O keeps records for administrative, statistical, and reporting purposes. Information is mainly provided by you on application forms and questionnaires, or by your school or university, in the form of progress reports. We may also store photographs (or videos) of you for record keeping or publicity purposes. We will always seek your consent before displaying photographs (or videos) in which you appear. If this is not possible (for example, a large group photo), the organization will remove any photograph if a complaint is received. LE•O will ensure that partners seek consent from parents for the use of images of children under 18 on any of LE•O's publications. Photographs will be used for LE•O's publications only and will not be passed to any third party.

LE•O will contact you occasionally by email, phone, or post to keep you informed about news and activities; will inform other LE•O scholars and alumni of your name, course, institution and e-mail address to encourage networking; will contact your center of study to obtain confidential academic reports, information on progress, and examination results during the period of your award.

***How we use your information: Supporters/Donors/Partners***

LE•O keeps records on its supporters, donors, and partners for administrative purposes. Where relevant, we may also store photographs of you for record keeping or publicity purposes. We will always seek your consent before displaying photographs in which you appear. If this is not possible (for example, a large group photo), the organization will remove any photograph if a complaint is received. LE•O will contact you occasionally by email, phone, or post to keep you informed about LE•O's news and activities

***How we use your information: Staff, volunteers, and trustees***

LE•O keeps records on staff, volunteers, and trustees for recruitment, equal opportunities monitoring, distribution of organizational material, payroll, pension, insurance, performance appraisal, and management. We may also store photographs (or videos) of you for record keeping or publicity purposes. We will always seek your consent before displaying photographs in which you appear. If this is not possible (for example, a large group photo), the organization will remove any photograph if a complaint is received.

**HOW WE STORE YOUR INFORMATION**

Information is stored on LE•O's password protected scholar database, password protected computer systems, and rarely on hardcopy paper files.

No more data is collected than necessary for the purpose declared. However, data will be held as long as necessary for the organization's charitable and legal functions (up to six years). Some data will be held indefinitely for business, legal, and statistical reporting purposes. All data will be password protected and stored securely. LE•O representatives will have access to it. The organization's email and database service providers may have access to some, mainly scholar, data as necessary.

The organization ensures confidentiality with employees, trustees, and contractors. All those with access to data are bound by data protection regulations and will not share your information with third parties. Adequate measures will be taken to safeguard data so as to prevent loss, destruction or unauthorized disclosure. Any data breach will be reported immediately to the organization's trustees and external advice will be commissioned from expert lawyers for any investigation and response. LE•O will take reasonable steps to keep personal data up to date and accurate.

Where it is not deemed appropriate to keep an individual's personal data it will be destroyed. If a request is received from an individual to destroy their personal data, LE•O will request that all staff holding paper or electronic details for the organization destroy them. Appropriate measures will be taken to ensure that data, which has been earmarked for destruction cannot be reconstructed and processed by third parties. When data held in accordance with this policy is destroyed, it will be destroyed securely in accordance with LE•O's file retention policy.

LE•O is fully committed to facilitating access by data subjects to their personal data while bearing in mind the need to protect other individuals' right to privacy. You may also withdraw your consent to storage of your data, request correction or erasure of your data, or request restriction in the ways that we process your data. If you wish to exercise any of these rights, please contact LE•O as indicated below. LE•O will respond within 30 calendar days to any such request.

## **REVIEW**

This policy will be reviewed periodically to take account of changes to the law and guidance issued by the Information Commissioner's Office (ICO). We will inform individuals in our contact database by email if we make any significant changes to this policy.

## **CONTACT**

If you have any questions or complaints related to this policy, please contact LE•O at

[info@leonardeducation.org](mailto:info@leonardeducation.org)