**PRIVACY STATEMENT**

**Introduction**

Firstgens (‘Firstgens’, ‘we’, ‘us’) respects the privacy of every individual whose personal information we process in providing our services, or whose personal information we may process as a result of providing our services to others, or who applies to volunteer at Firstgens. Personal information is any information relating to an identified or identifiable living person.

Personal information is any information relating to an identified or identifiable living person. When ‘you’ or ‘your’ are used in this statement, we are referring to the relevant individual who is subject of the personal data. Firstgens processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

**Purpose of this Privacy Statement**

This privacy statement (‘Privacy Statement’) explains our approach to any personal information that we might collect from you, or which we have obtained about you from a third party, and the purposes for which we process your personal information. This Privacy Statement also sets out your rights in respect of our processing of your personal information.

This Privacy Statement, along with any information provided to you at the point of collection, will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Statement is intended to assist you in understanding how your personal information may be processed by us as a result of providing the Services to others or when you apply to work/volunteer at Firstgens. We encourage you to read and understand it.

Firstgens has appointed Alaya Holloway, Director, as the person with responsibility for data protection compliance within the organisation. She can be contacted at alaya@firstgens.co.uk.

**Who we are and what we do**

Firstgens is an English limited company under number 12772926 and whose registered office is at 370A Gloucester Road, Bristol.

Firstgens provides higher education services to universities including programmes and staff training. In some cases we will process data on behalf of organisations that we carry out work for. There may also be cases where we act as the data controller. Whether we are a data processor or a data controller for the purposes of your data will depend on the nature of the arrangements between us and the organisation we are working for and the nature of the services that we are carrying out.

**How to contact us**

If you have any questions about this Privacy Statement or want to exercise your rights as set out in this Privacy Statement, please contact us by sending an email to our data Protection Officer, Alaya Holloway, at alaya@firstgens.co.uk.

**Collection of personal information**

Generally, we collect personal data from students signing up to our programme when providing services to the relevant client. Moreover, students and alumni and prospective clients signing up to our newsletters and becoming part of the community database.

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal information with us where it is required for those purposes and in accordance with relevant data privacy laws.

The categories of personal data processed by us in relation to the services we provide are numerous and it is not possible to provide an exhaustive list. However, they may include:

* personal contact details such as name, personal email addresses, university email address and phone number.
* information included in a CV or cover letter or as part of the application process.

For certain activities, we may process special categories of personal data, including:

* information about race or ethnicity and sexual orientation

**Use of personal information**

We use personal data for the purposes set out below.

Providing services  
We provide a range of services. Some of our services require us to process personal data in order to provide carry out our contractual obligations.

**Legal grounds: Legitimate interests, legal obligation, public interest or consent**

This processing of personal information by us is necessary for the purposes of the legitimate interests pursued by us in providing services and our client in receiving services as part of running their organisation. Where we process special categories of personal data, we rely on a relevant public interest condition or consent.

**Administering, managing and developing our businesses and services**

We may process personal data in order to run our business and our community activities, including:

* managing our relationship with clients and prospective clients;
* developing our businesses and services (such as identifying client needs and improvements in service delivery);
* maintaining and using IT systems;
* hosting or facilitating events, delivering newsletters and connecting members of our community; and
* administering and managing our website and systems and applications.

**Legal grounds: Legitimate interests**

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

**Security, quality and risk management activities**

Complying with any requirement of law, regulation or a professional body of which we are a member as with any provider of services, we may be subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with any such obligations and those records may contain personal data.

**Our Website**  
Our website www.firstgens.co.uk is owned and controlled by FIRSTGENSUK.

Firstgens respects the privacy of all those who visit our site and use our online services and we collect information from and about our users to be used to improve the service we offer. Except as set out within this Privacy Policy, we do not release personally identifiable information (as described below) about users of this site without their permission.

**Opt-Out Option**

If you would like to have your personally-identifiable information removed from Firstgens databases going forward, please email [alaya@firstgens.co.uk](mailto:alaya@firstgens.co.uk) and we will use reasonable efforts to comply with your request. However, there will be residual information that will remain within Firstgens databases, and other historical internal records, which may or may not contain such personally- identifiable information.

**The information we may gather**

*Non-personally-identifiable information*: as a standard practice Firstgens monitors activities such as site visits each month - without really knowing who those users are. We analyse this data for trends and statistics, such as which parts of our site users are visiting and how long they spend there. We also gather information about what users are searching for. We use all this information in order to improve our content, plan site enhancements, and measure overall site effectiveness.

*Personally identifiable information*: in certain areas of this site, we require that you provide us with personally-identifiable information, in order to register the individual on the database. If you submit a request for more information from us, the information you submit will only be used by firstgens. Our lists are private and are never sold to any third parties.

**Information about Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. Cookies act as a memory for a website, allowing that website to remember your computer on your return visits. This is particularly important for websites that require you to sign in as it speeds up your access. We use both session cookies (which exist only until you close your web browser) and persistent cookies (which exist for a longer, specified period of time). The majority of web browsers accept cookies, but you can usually change the web browser’s settings to refuse new cookies, disable existing ones or simply let you know when new ones are sent to your hard disk. However, please be aware that, if you refuse or disable cookies, some of the website’s functionality may be lost. If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies. If you want to stop cookies being stored on your computer in future, please refer to your browser manufacturer's instructions by clicking 'Help' in your browser menu. However, some of our website features may not function as a result.

**Data retention**

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 6 years.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

**When and how we share personal data and locations of processing**

We may use other organisations to help us deliver our services as agreed with our client on an engagement-specific basis.

**Confidentiality and security of your personal information**

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

**How to access your information and your other rights?**

If we are the data controller in respect of your personal information, you have the following rights in relation to the personal information we hold about you. Please note that these rights are subject to certain exemptions which may be applicable to any request you make.

**Your right of access**

If you ask us, we’ll confirm whether we’re processing your personal information and, subject to any applicable exemptions, provide you with a copy of that personal information (along with certain other details) within the timescales or extended timescales provided for by the GDPR for complex requests, or where applicable, provide you with an explanation as to why we will not be complying with your request. If you require additional copies, we may need to charge a reasonable fee.

**Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you’re entitled to have it rectified. If you are entitled to rectification and if we’ve shared your personal information with others, we’ll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we’ll also tell you who we’ve shared your personal information with so that you can contact them directly.

**Your right to erasure**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent. If you are entitled to erasure and if we’ve shared your personal information with others, we’ll take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal information with so that you can contact them directly.

**Your right to restrict processing**

You can ask us to ‘block’ or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing your personal information. If you are entitled to restriction and if we’ve shared your personal information with others, we’ll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal information with so that you can contact them directly.

**Your right to data portability**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you’ve provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

**Your right to object**

You can ask us to stop processing your personal information, and we will do so, if we are:

* relying on our own or someone else’s legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
* processing your personal information for direct marketing.

**Your rights in relation to automated decision-making and profiling**

You have the right not to be subject to a decision when it’s based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

**Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

If you want to exercise any of these rights you can do so by contacting Alaya Holloway at [alaya@firstgens.co.uk](mailto:alaya@firstgens.co.uk) who is the appointed Data Protection Officer.

**Your right to lodge a complaint with the supervisory authority:**

If you have a concern about any aspect of our privacy practices, including the way we’ve handled your personal information, you can report it to the Information Commissioner’s Office (ICO). You can find details about how to do this on the ICO website at https://ico.org.uk/concerns/ or by calling their office on 0303 123 1113.

**Changes to this Privacy Policy**

We may make changes to this Privacy Policy from time to time. Last updated July 2023.

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