

## How your personal information is used by Common Purpose

This policy sets out most of your rights under the new laws of GDPR. Your information will be held by Common Purpose Charitable Trust, and all its subsidiaries and licensees, who trade as Common Purpose.

More information can be found on <https://commonpurpose.org/about-us/governance/>

## How we use your personal information

This privacy notice is to let you know how Common Purpose will look after your personal information. This includes what you tell us about yourself, what we learn by having you as a participant on our programmes, and the choices you give us about what marketing you want us to send you. This notice explains how we do this, tells you about your privacy rights and how the law protects you.

## Our Privacy Promise

We promise to:

- Keep your data safe and private
- Never sell your data
- Give you ways to manage and review your marketing choices at any time

## How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works. The Data Protection law says that we are allowed to use personal information only if we have a valid reason to do so. This includes sharing it outside Common Purpose. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interests, we will tell you what that is.

## Legal Basis for Processing Data at Common Purpose

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. The law says we must have one or more of these reasons:

- **Consent:** where you agree to us using your information in this way, e.g. sharing your name and job title with the other participants on your programmes
- **Contract:** your personal information is processed in order to fulfil a contractual arrangement e.g. in order to send you your programme information
- **Legal obligation:** where there is statutory or other legal requirement to share the information e.g. when we have to share your information for auditing purposes

- Legitimate interests:** this means the interests of Common Purpose in managing our business to allow us to deliver our programmes in the most secure and appropriate way, e.g. to transfer your data to certain Third Party's such as delivery partners

This is also where we tell you what our legitimate interests are.

<b>Serving you as a customer</b>		
<p>To communicate with you about Common Purpose and our programmes</p> <p>To keep you up to date about our alumni offering</p> <p>To send you occasional email updates and newsletters, including the Common Purpose quarterly Alumni Bulletin</p> <p>To provide advice or guidance about our programmes</p>	<p>Legitimate Interests</p> <p>Contractual obligation</p> <p>Legal duty</p>	<p>Being efficient about how we fulfil our legal and contractual obligations</p> <p>Keeping our records up to date, working out which of our products and services may interest you and telling you about them</p> <p>Seeking your consent when we need it to contact you</p>
<p>To publish your name, job title, employer organisation and programme attended as part of our promotional materials</p> <p>To publish your contact details strictly to members of your own participant group as part of the information distributed to participants</p>	<p>Consent</p>	
<b>Business Management and Improvement</b>		
<p>To carry out statistical analysis</p> <p>To share your information with third parties</p> <p>To develop new ways to meet our customers' needs and to grow our business</p>	<p>Legitimate Interests</p> <p>Consent</p> <p>Contractual obligations</p>	<p>Being efficient about how we fulfil our legal and contractual obligations</p> <p>Developing new programmes and thought leadership</p> <p>Defining types of customers for new products or services</p>

<p>To develop and carry out marketing activities</p> <p>To study how our customers use products and services from us and other organisations</p>		
<p>To run our business in an efficient and proper way, this includes managing our financial position, business capability, planning, communications, corporate governance, and audit</p>	<p>Legitimate interests</p> <p>Legal duty</p>	<p>Being efficient about how we fulfil our legal and contractual obligations</p> <p>Complying with rules and guidance from regulators</p>
<p>To exercise our rights set out in agreements or contracts</p>	<p>Contractual Obligation</p>	
<p><b>Managing our Operations</b></p>		
<p>To manage our relationship with you or your business</p> <p>To make and manage supplier payments</p> <p>To manage fees, charges and interest due on customer accounts</p> <p>To collect and recover money that is owed to us</p> <p>To deliver our programmes</p>	<p>Legitimate Interests</p> <p>Consent</p> <p>Contractual obligation</p> <p>Legal duty</p>	<p>Being efficient about how we fulfil our legal and contractual obligations</p> <p>Complying with rules and guidance from regulators</p>
<p><b>Manage Security and Risk</b></p>		
<p>To manage risk for us and our customers</p> <p>To obey laws and regulations that apply to us</p> <p>To respond to complaints and seek to resolve them</p>	<p>Legal duty</p> <p>Fulfilling contracts</p> <p>Legitimate Interests</p>	<p>Being efficient about how we fulfil our legal and contractual obligations</p>

## Types of Personal Information

We use different types of personal information, and group them together like this.

Contact Information	Your name, contact details, including e.g. your email and phone number
Background Information	This includes background information about you and your work and profession, including your professional background, nationality, biography and social media accounts
Billing Details	Details about your fees and payments to and from you
Personal arrangements	Information about specific accessibility requirements or dietary requirements you would like us to be aware of
Programme Information	Details about any programmes or events you have attended or will attend in the future
Communications	What we learn about you from letters and emails you write to us, and conversations between us
Consents	Any permissions, consents or preferences that you give us. This includes for example how you want us to contact you, whether you have opted into receiving central communications

## Where we collect personal information from

We may collect personal information about you (or your business) from other companies within the Common Purpose Group and from these sources:

### Data you give to us:

- When you apply for our programmes
- When you talk to us on the phone or in person
- When you use our websites
- When you give us your business card
- In emails and letters
- In participants surveys

### Data we collect when you use our services:

This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data
- Profile and usage data. This includes the profile you create on our websites to access blended learning content. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software

### Data from third parties we work with:

- Companies that introduce you to us
- Our Partners
- Financial advisers
- Insurers
- Social networks
- Fraud prevention agencies

- Payroll service providers
- Pensions Providers
- Statutory, regulatory or government agencies (such as HMRC and Companies House)
- Agents working on our behalf

## **Who we share your personal information with**

We may share your personal information with companies within the Common Purpose Group, and our partners.

If we do share your personal information with your partners, we will only share your data with the relevant partner to your particular programme, and we will inform you of this at the time of applying to one of our programmes. We will also ensure that the partner in question is compliant with the latest data protection legislation.

## **If you choose not to give personal information**

We may need to collect personal information by law, or under the terms of a contract we have with you as a client of ours.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It could mean that we cannot provide the service you have bought from us.

Any data collection that is optional will be made clear at the point of collection.

## **How long we keep your personal information**

We will keep your personal information for as long as you are a participant on a Common Purpose programme.

After you become an alumnus, we will keep your data for the purposes previously outlined, or if we cannot delete it for legal, regulatory or technical reasons.

If you are not a current participant or alumnus of Common Purpose, we will keep your records for 3 years, for the purposes previously outlined, or if we cannot delete it for legal, regulatory or technical reasons.

We will always make sure that your privacy is protected and only use it for those purposes.

## **How to get a copy of your personal information**

You can access the personal information we hold on you by emailing us at [info@commonpurpose.org](mailto:info@commonpurpose.org) or writing to us at this address:

Common Purpose  
Data Protection Team  
38 Artillery Lane  
London, E1 7LS  
United Kingdom

## Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

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

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

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. Please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

## How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

## How to complain

Please let us know if you are unhappy with how we have used your personal information. You can do this by contacting us on [info@commonpurpose.org](mailto:info@commonpurpose.org)

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to [report a concern](#).

## Data transfers out of the EEA

Common Purpose and other organisations we share data with for these purposes may send personal information to countries outside the European Economic Area ('EEA'). When we do, there will be a contract in place to make sure the recipient protects the data to the same standard as the EEA. This may include following international frameworks for making data sharing secure.

## What are your rights?

You are entitled to request the following from Common Purpose. These are called your Data Subject Rights and there is more information on these on the Information Commissioners website [www.ico.org.uk](http://www.ico.org.uk)

- Right of access – to request access to your personal information and information about how we process it
- Right to rectification – to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- Right to erasure (also known as the Right to be Forgotten) – to have your personal information erased
- Right to restriction of processing – to restrict processing of your personal information
- Right to data portability - to electronically move, copy or transfer your personal information in a standard form
- Right to object - to object to processing of your personal information
- Rights with regards to automated individual decision making, including profiling –rights relating to automated decision making, including profiling

If you have any general questions about your rights or want to exercise your rights please contact [info@commonpurpose.org](mailto:info@commonpurpose.org)

**Common Purpose Charitable Trust**  
**38 Artillery Lane,**  
**London E1 7LS**  
**United Kingdom**  
[www.commonpurpose.org](http://www.commonpurpose.org)

Last updated: November 2019  
Last Reviewed: November 2022