**PRIVACY STATEMENT**

The John Aves Education Project (JAEP) collects, processes and uses information about individuals who come into contact with it, particularly its scholars, partners, supporters and/or donors, trustees, and website visitors. This statement explains how JAEP uses the personal information we collect from you, why we collect it and what we do with it. JAEP fully complies with all laws and regulations applicable to the processing of any personal data under the UK Data Protection Act 2018 and the EU General Data Protection Regulation (“Data Protection Law”).

**1. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION**

We may collect and/or process your Personal Data only as stated in this Policy, for the purposes described below. We do not sell, share or transfer Personal Data to third parties, other than in the specific circumstances described in section 3.

**Registration and Communication**

You may give us your name and contact information by: filling in forms on our website; newsletters and updates about our activities and events; registering for or enquiring about our activities, events and services; contacting us through our website; joining our Scholars’ Private Members page; donating to JAEP; communicating with JAEP through phone or email.

JAEP keeps records on its scholars, supporters, donors, partners and trustees for administrative and communication purposes. We may also store photographs of you and will use all reasonable efforts to seek your consent before displaying photographs in which you appear. If this is not possible (for large group photos or videos involving an event, for example) we will remove any photograph or video if a valid complaint is received.  We use the information you give us to: send you newsletters and updates which you are free to unsubscribe from at any time; provide you with the services and the information about our activities and events that you have requested; communicate with you in connection with our charitable aims and activities.

**Administration and Management**

You may provide your name, contact information and other personal information (such as CVs, references, photographs, applications, reports, etc.) to us if you apply for and/or receive a grant.

We use the information you give us to assist the effective management and in the efficient running of JAEP services. JAEP keeps records for administrative, statistical and reporting purposes. Information may be provided by you on application forms and questionnaires, or by your school or university or employers, in the form of reports or references.

We may also store photographs or videos of you. We will use all reasonable efforts to seek your consent before displaying photographs or videos in which you appear. If this is not possible (for large group photos or videos involving an event, for example) we will remove any photograph or video if a valid complaint is received. Photographs will be used for JAEP’s publications only and will not be passed to any third party.  JAEP will contact you occasionally by email, phone or post; and if you are a JAEP scholar then JAEP will inform other JAEP scholars of your name, course, institution and e-mail address to encourage networking and will contact your centre of study to obtain academic reports, progress reports and examination results.

**Third Party Information**

We may also receive information about you from third parties, for example from our service providers. When you visit our sites, we use third party services to collect certain technical information from your device including standard Internet log information i.e. Internet Protocol (IP) address, browser type and version, and page interaction information.

**Cookies**

The John Aves Education Project uses cookies – small files stored in user web browsers – to improve the functions of the JAEP website, including optimising presentation of information, streamlining the log-in process, and recording user preferences. Cookies may store personal information including browser information, IP address and username. Please see <https://www.wikihow.com/Disable-Cookies> for information on how to disable cookies. However, if a user disables cookies, he/she may not be able to log into or use certain features of the JAEP website.

The technical information we collect when you visit our websites is used for site administration and internal operations (i.e. troubleshooting, data analysis, testing, research, statistical and survey purposes). This enables us to improve our websites to ensure that content is presented in the most effective manner for you and for your device, to allow you to participate in interactive features of our services when you choose to do so, and as part of our efforts to keep our websites safe and secure.

For detailed cookie information please see page 6.

**2. LAWFUL BASIS**

If you voluntarily choose to provide your name and contact and other information in the ways listed above, we will rely on your consent and/or our legitimate interests to use any personal information as described below. We will consider any potential risks to you through our use of such personal information.

**3. SHARING YOUR PERSONAL INFORMATION**

JAEP’s trustees, will have access to your information. The JAEP’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.

For the purposes described above we may share your information with our service providers (such as Mail chimp), suppliers (such as our website designer and host), partners, associated organisations and agents.

JAEP will not sell your personal information to third parties under any circumstances, nor do we permit third parties to transfer the personal information we have shared with them other than for the purposes described above.

We reserve the right to disclose your personal information to third parties:

* Should we merge with another organisation to form a new entity, your personal information may be transferred to the new entity
* If we acquire or divest any programme or assets, we may disclose your personal information to the previous or new owner or operator of the programme or assets.
* For auditing purposes
* If we are under any legal or regulatory obligation to do so; and
* In connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

**4. INTERNATIONAL DATA TRANSFERS (JAEP Scholars only)**

Only if necessary, we may transfer your personal information to organisations based outside the UK or European Economic Area (EEA). Please note that certain countries outside of the UK or EEA have a lower standard of protection for personal data, including lower security protections. Where your personal data is transferred, stored, and/or otherwise processed outside the UK or EEA in a country which does not offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal data (for instance, entering into the European Commission approved standard contractual clauses). If you have any questions about the transfer of your personal information, please contact us using the details at section 9 below.

**5. LOOKING AFTER YOUR PERSONAL INFORMATION**

We securely store all personal information you provide to us. As the transmission of personal information via the Internet is not completely secure, we cannot guarantee the security of your personal information transmitted to our websites; any transmission is at your own risk.

Once we have received your personal information, we will use appropriate procedures and security features to try to prevent unauthorised access. Information is stored on JAEP’s password protected scholar database, password protected computer systems, and rarely on hardcopy paper files. JAEP will take reasonable steps to keep personal data up to date and accurate. No more data is collected than necessary for the purpose declared.

Adequate measures will be taken to safeguard data so as to prevent loss, destruction or unauthorised disclosure. Any data breach will be reported immediately to the JAEP’s Trustees and external advice will be commissioned for any investigation and response.

Data will generally be held as long as necessary for the JAEP’s charitable and legal functions (up to six years). Some data such as name, contact details and basic background information and data on scholars’ academic, career and other progress will be held indefinitely for business, legal and statistical reporting purposes. Where it is no longer 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, JAEP will request that all staff holding paper or electronic details for the organisation destroy them. However, some scholar data such as name, gender, nationality, school/university attended with JAEP funding and pass/fail information may still be retained for statistical and review purposes.   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 JAEP’s file retention policy.

**6. YOUR RIGHTS**

You have the right to ask us not to use your personal information for marketing purposes by checking certain boxes on the forms we use to collect your personal information, or by contacting us.

JAEP 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 have the right to access personal information held about you. 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, you should send your request in writing to info@jaep.org.uk JAEP will respond within 48 hours to any such request.

**7. CHANGES TO THIS POLICY**

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.

**8. THIRD PARTY SITES**

Our websites may contain links to and from the websites of third party affiliates. These websites have their own privacy policies which you are advised to read. We accept no responsibility or liability for such policies.

**9. CONTACT**

The Controller of your personal information is The John Aves Education Project. JAEP representatives are responsible for monitoring compliance with relevant legislation in relation to the protection of personal information.  Please contact us if you have any concerns or questions about the above information or you wish to ask us not to process your personal information for particular purposes. Where you have specific requests relating to how we manage your personal information, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests. If we are unable to resolve your concerns about the way JAEP collects, processes or stores your personal information then you have the right to lodge a complaint with the Information Commissioner’s Office at <https://ico.org.uk/concerns>.

**COOKIES POLICY**

**COOKIES**

Like most organisations, the JAEP uses cookies to capture information about its websites’ users. A cookie is a small file of letters and numbers that we save to your computer or device if you agree.

Cookies allow us to recognise and count your visits, and to see how you move around our sites while you are using them. This helps us to provide you with a good experience while you browse and to improve the way our sites work, for example by making sure you can find what you need.

Cookies are also set when you:

* click on social networking buttons in our pages
* watch videos
* register for services
* take part in surveys and other activities.

**THIRD-PARTY COOKIES**

As well as the cookies we set, we may use third party cookies and other similar technologies set by other websites when you visit them to help us to understand some simple information about the age, location and interests of the people who visit our sites. Third parties may use these technologies to collect or receive information from our website and elsewhere on the internet and use that information to provide measurement services and to target adverts.

We only ever use this information in aggregate, and never associate it with any personal information that might identify you.

You can opt out of being tracked by cookies set by third parties by using the [Google ad preferences](https://www.google.com/settings/ads/%22%20%5Ct%20%22_blank) or the [opt-out tool](https://tools.google.com/dlpage/gaoptout/%22%20%5Ct%20%22_blank). You can also get more information from [Google](https://myaccount.google.com/intro/privacy%22%20%5Cl%20%22ads%22%20%5Ct%20%22_blank) or the [Your Online Choices website](http://www.youronlinechoices.com/uk/your-ad-choices%22%20%5Ct%20%22_blank).

You can opt out of being tracked and the collection and use of information for Facebook ad targeting in your [ad settings page on Facebook](https://www.facebook.com/settings/?tab=ads" \t "_blank).  You can also get more information from Facebook on their [use of cookies](https://www.facebook.com/policies/cookies/%22%20%5Ct%20%22_blank) and [advertising policies](https://www.facebook.com/about/basics/advertising).

You can opt out of tracking from all participating companies through the [European Interactive Digital Advertising Alliance ‘Your Online Choices’](http://www.youronlinechoices.eu/%22%20%5Ct%20%22_blank) site.  In the UK, click on the [‘Your ad choices’ menu option](http://www.youronlinechoices.com/uk/your-ad-choices%22%20%5Ct%20%22_blank).

By continuing to use our sites and by using video and social media functionality, you consent to the relevant cookies being set on your device.

For general information about cookies, and how to control and disable them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org/%22%20%5Ct%20%22_blank)

**COOKIES WE USE ON OUR SITES BY TYPE**

Across our sites we may make use of Flash files, which present information, allow integration with third parties (such as YouTube) and can offer a richer online experience. We have strived to identify any Flash elements that are likely to set cookies but, at this point in time, we cannot guarantee the status of every Flash file. Adobe offers a tool to monitor and remove Flash cookies.

We use Google Analytics, Google Analytics demographics and interest reporting, and integrated services that require Google Analytics to collect data via advertising cookies and identifiers. Google Analytics is a tool that helps website and app owners to understand how their visitors behave. It uses a set of cookies to collect information and report website usage statistics without personally identifying individual visitors to Google. It also uses some cookies set by other websites to help us understand more about our sites’ visitors. The information generated relating to our website is used to create reports about the use of the website. Google will store this information.  Google’s privacy policy is available at: [http://www.google.com/privacypolicy.html](http://www.google.com/privacypolicy.html%22%20%5Ct%20%22_blank).

We use [web beacons](https://en.wikipedia.org/wiki/Web_beacon%22%20%5Ct%20%22_blank) like Facebook Pixel to understand what users of our site do after clicking a link in an email that we’ve sent to a list of subscribers, or clicking on an advert we’ve placed on Facebook. This information helps us to improve the content we make, reach people who are interested in our work with our advertising and social activity, and measure how effective our advertising and newsletters are, without personally identifying individual site visitors, newsletter subscribers or Facebook users.

The following table is a list of the cookies we use and why we use them.

|  |  |  |
| --- | --- | --- |
| Cookie | Name | Purpose |
| Session cookie | SESS<…> | When required, cookies beginning with ‘SESS’ are used to track an individual’s persistent status, such as whether they are logged in. |
| Google analytics | \_utma\_utmb\_utmc\_utmz | These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. |
| JavaScript | has\_js | We use this cookie to track which browsers are capable of processing JavaScript. JavaScript is a scripting language which provides enhanced interactivity and visual effects. |
| Cookie acceptance | cookied-agreed-en | This cookie is used to record if a user has accepted the use of cookies on this website. |

**TERMS**

The JAEP offers this website, including all information, software, products and services available, from this Website or offered as part of or in conjunction with this Website (the “JAEP”), to you, the user, conditioned upon your acceptance of all of the terms, conditions, policies and notices stated here. The JAEP reserves the right to make changes to these Terms and Conditions by posting the changed Terms and Conditions in this location.

Your continued use of the Website constitutes your agreement to all such terms, conditions and notices, and any changes to the Terms and Conditions made by JAEP Website.

The term ‘JAEP’ or ‘us’ or ‘we’ refers to the owner of the website. The term ‘you’ refers to the user or viewer of our website.

The use of this website is subject to the following terms of use:

Use the website at your own risk. This website is provided to you “as is,” without warranty of any kind either express or implied. Neither the JAEP nor its employees, agents, third-party information providers, merchants, licensors or the like warrant that the website or its operation will be accurate, reliable, uninterrupted or error-free. No agent or representative has the authority to create any warranty regarding the website on behalf of the JAEP. The JAEP reserves the right to add, change or discontinue at any time any functionality or feature of the website.