

INTRODUCTION

The English-Speaking Union of the Commonwealth is committed to protecting and respecting your privacy. This policy outlines the basis on which any personal information we collect from you, or that you provide to us, will be used by us.

This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

You should be aware that if you access third party websites, using links provided on our websites, these websites are outside our control and have their own privacy policies governing the use of personal information and we do not accept any responsibility or liability for these policies.

It is important that you read this privacy policy together with any other privacy policy or information we may provide on specific occasions when we are collecting or using personal information about you so that you are fully aware of how and why we are using your information. This privacy policy is in addition to other notices and privacy policies and is not intended to override them.

WHO ARE WE

We are the English-Speaking Union of the Commonwealth (the ESU). We are a charity and membership organisation dedicated to helping people realise their potential through giving them the skills and confidence in communication to articulate their ideas and share them with others. We are experts in the provision of oracy skills.

Within the context of this Privacy Policy "Our", "Us" and "We" mean the English-Speaking Union in the Commonwealth, as listed below:

- Registered charity number 273136 in England and Wales
- ESU Trading Limited, a company limited by guarantee No' 01313561. Registered office: Dartmouth House, 37 Charles St, W1J 5ED.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our information team by emailing jane.easton@esu.org or writing to Dartmouth House, 37 Charles Street, London W1J 5ED or calling 020 7529 1550.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) (www.ico.org.uk) We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us first.

YOUR DUTY TO INFORM US OF CHANGES TO YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

Identity Information includes your first name, last name, username, password or similar identifier, title, date of birth and gender.

Contact Information includes your address, email address and telephone numbers.

Financial Information includes bank account and payment card details.

Transaction Information includes details about payments to and from you and other details of products and services you have purchased from us. This includes data provided to administer services, membership, alumni communications, scholarships, awards, competition entries, participation in programmes or competitions and provision of information.

Technical Information includes internet protocol (IP) address, your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Profile Information includes your username and password, education programmes that you have purchases or orders made by you, your interests, marketing preferences, feedback and survey responses.

Usage Information includes information about how you use our website, products and services including keeping records of your visits to Dartmouth House.

Communications Information includes your preferences in receiving communications from us and your communication preferences.

We also collect, use and share statistical or demographic information for any purpose. This information could be derived from your personal information but is not considered personal information in law as this information will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Information to calculate the percentage of users accessing a specific website feature. However, if we combine or connect this information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will be used in accordance with this privacy policy.

We do not collect special categories of personal data about you (race; ethnic origin; politics; religion; trade union membership; genetics; biometrics; health; sex life; or sexual orientation).

IF YOU DO NOT GIVE US YOUR PERSONAL INFORMATION

Where we need to collect personal information by law, or under the terms of a contract we have with you, and if you do not provide that personal information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with membership). In this case, we may have to cancel membership or another service or product you have with us, but we will notify you if this is the case at the time.

We use different methods to collect information from and about you including through:

Direct interactions You may give us your identity, contact and financial information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

- apply for membership or another of our events, alumni programmes, scholarships, awards, competitions or for any of our products or services;

- create an account on our website;
- subscribe to our services, publications or newsletters;
- express an interest in any of our programmes, membership, alumni programmes, scholarships, awards, or competition entries;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions As you interact with our website, we will automatically collect Technical Information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies. We may also receive Technical Information about you if you visit other websites employing our cookies. Please see our cookie policy [<https://www.esu.org/cookies>] for further details.

Third parties or publicly available sources. We will receive personal information about you from various third parties and public sources as set out below:

- Technical Information from the following parties:
 - Analytics providers [such as Google based outside of the EU];
 - Contact, Financial and Transaction Information from providers of technical, payment and delivery services and Identity and Contact Information from information brokers or aggregators based outside of the EU.
 - Identity and Contact Information from publicly available sources such as Companies House, The Charity Commission and the Electoral Register based inside the EU.
 - Online survey providers [such as Survey Monkey and Mail Chimp based outside of the EU].

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we have your consent.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

In regard to communications, generally, we do not rely on consent as a legal basis for processing your personal information because communicating with you is an inherent part of your membership. Although you have the right to stop receiving some communications by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Type of information	Lawful basis for processing including basis of legitimate interest
To register you as a new member, user, applicant of any of our activities e.g. membership	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to be able to communicate with beneficiaries/users of our services/activities for specific purposes)
To administer services, membership, alumni communications, scholarships, awards, competition entries, participation in programmes or competitions and provision of information including: a) Manage and send information on our activities b) Manage payments, fees and charges c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to be able to communicate with beneficiaries/users of our services/activities for specific purposes, recover debts due to us)
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To send our newsletter to you if you signed up via the website	(a) Identity (b) Contact	(a) Consent
To process any donations and gift aid (if added)	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (knowing our donors) (b) Necessary to comply with a legal obligation (gift aid details)
To administer and protect our business and this website (including troubleshooting, information analysis, testing, system maintenance, support, reporting and hosting of information)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use information analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our

		marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.esu.org/cookies>

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SHARING OF YOUR PERSONAL INFORMATION

We may share your personal information with the parties set out below for the purposes set out in the table above.

Internal Third Parties

- Our trading subsidiary as set out in our Who Are We section above who provide

External Third Parties

- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who may provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Mailing Houses and Printers (Streets Process Colour Limited), Computer Support and Services (Epic IT Ltd), and IT solutions (Illuminet Solutions).

- Participating schools who administer our programmes.
- Third parties to whom we may choose to transfer or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy policy.
- We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

SECURITY

We store your information on secure servers in the European Economic Area (EEA). We may also store information in paper files.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We use secure server software (SSL) to encrypt financial and personal information you input before it is sent to us. While we cannot ensure or guarantee that loss, misuse or alteration of information will not occur while it is under our control, we use our best efforts to try to prevent this.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WILL YOU USE MY PERSONAL INFORMATION FOR?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Information) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your information: see your legal rights section below for further information.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under information protection laws in relation to your personal information.

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- If you want us to establish the information’s accuracy.
- Where our use of the information is unlawful but you do not want us to erase it.
- Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please contact us to exercise any of your rights. However, we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

We are not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act; using the funds generously donated to us by our supporters for such activities is not in accordance with our charitable purposes.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

CHANGES TO THE PRIVACY POLICY

We keep our privacy policy under regular review. This version was last updated on 22nd February 2019.