

AAETO/HOLEX Privacy Notice – May 2018

Introduction

This Privacy notice sets out how we deal with and store the data we hold on members of HOLEX. HOLEX is a professional network where sector leaders can share ideas and be informed of new developments. As a member of the network, you have shared your email contact details with the network administrator who in turn has attached you to the network via the JISC platform. Your details may also have been provided in order for us to manage the business relationship or so that you can participate in other HOLEX activity. This paper defines personal data, explains where it comes from and sets down the principles by which we work.

Personal data

Personal data, also sometimes called personal information, in similar organisations could include addresses, age, ethnicity etc. but, in the case of HOLEX, the data we maintain is contact information (including your work email address, details of the organisation who pay your subscription fee, your job title and, where provided a telephone number(s)).

Where does the data we hold on you come from?

The information is provided by you or your colleagues at various points of interacting with us; for example, via sign up to membership, a provider lead has designated you, from network member events, e-groups or via email correspondence.

The data we collect is used to allow you to join the HOLEX network. For example, without your email address you cannot be put on the policy exchange or post-box or get invites to our network events. If there is an online network to which you no longer want to subscribe, you can ask to be removed from it.

Storing the data

We store and process your data only to the extent that is necessary for the provision of agreed HOLEX services and to manage our relationship with you.

The GDPR regulations require us to state which one of six lawful bases we are relying upon when processing personal data. In providing HOLEX membership services, the lawful basis upon which we are relying is 'legitimate interest.' This is because we are using your data in ways that you would reasonably expect, in order to provide the HOLEX membership network service that your organisation has signed up to, in order to help you to perform your job.

If we do not collect and use your data, we are unable to provide your organisation with most of our services.

HOLEX services, by their very nature, revolve around networking and we believe that there is minimal privacy impact in the way in which we use your data.

Where we collect data, we'll only process it:

- to enter into a contract with you, or

- where we have legitimate interests to process the data and they are not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

Data sharing (or not)

We do not share your data and always ask your permission before passing on contact details and we would never sell your data on to third parties.

We will only disclose your data if we are legally required to do so, or if we have your consent.

Note that, in participating in e-group discussions, you will be sharing any data/contact details within your email with all members of that e-group just as if you were emailing those members directly. Note that these emails will be retained within e-group archives (which are accessible only by e-group members).

If you decide to move on

We hope that you will always want to be part of the HOLEX network, but if your organisation leaves membership or you decide to move on, we will remove you from our e-groups and will stop future communications.

If at any point you would like to be removed from an e-group, we can easily arrange this. Please contact us via charlie.mckenna@holex.org.uk.

Note that, in order that your organisation gets the full benefit of their membership, they should ideally have at least one representative on each relevant e-group and we need at least one person nominated as the HOLEX contact.

Retention

The length of time we keep your data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide the organisation for whom you are working with HOLEX membership services, or to comply with applicable legal, tax or accounting requirements).

We will retain your personal data for as long as we have a relationship with your employing organisation and for a period of time afterwards whilst it remains useful and meaningful to us, in accordance with our data retention policies and practices. Following that period, we will make sure it is deleted or anonymised.

Other personal data

It is very rare that we need to collect additional personal data outside the scope of day to day HOLEX membership servicing. If for any reason we do need to collect extra data, for example for a survey, we will be very clear about the purpose of collecting it and what we plan to do with it. In any of these such instances, we will only retain the data for as long as it might be considered useful/necessary.

The GDPR regulations require us to state which one of six lawful bases we are using to process data; in this instance, the lawful basis upon which we are relying would be ‘consent,’ based on you having provided the data for a specific purpose. We promise that we will not use the data for another purpose unless we acquire your additional consent.

Where we are processing data based on consent, you are entitled at any point to withdraw consent in relation to this processing. Should you wish to remove consent in relation to such data processing, please contact us via charlie.mckenna@holex.org.uk.

Your rights around your personal data

The contact information we hold is your data and you have certain rights relating to it.

When it comes to e-group messages, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the e-group footer or send your request to charlie.mckenna@holex.org.uk.

You also have rights to:

- know what data we hold about you, and to make sure it’s correct and up to date.
- request a copy of your data or ask us to restrict processing your data or delete it.
- object to our continued processing of your data.

You can exercise these rights at any time by sending an email to charlie.mckenna@holex.org.uk.

If you are not happy with how we are processing your data, please let us know by sending an email to charlie.mckenna@holex.org.uk. We will review and investigate your complaint and try to get back to you within a reasonable time frame. You can also complain to your local data protection authority or to ICO. They will be able to advise you how to submit a complaint.

Security

Security is a priority for us when it comes to your data. We are committed to protecting your data and have appropriate technical and organisational measures in place to make sure that happens.

Company/contact information

Note that HOLEX is the trading name for the Association of Adult Education and Training Organisations (AAETO), a not-for-profit company. All business is transacted through AAETO.

For any policy matters, please get in touch with Sue Pember – Director of Policy and External Relations on sue.pember@holex.org.uk or via 07469 209083.

For any operational issues or membership queries, please get in touch with Charlie McKenna – HOLEX Operations Officer – on charlie.mckenna@holex.org.uk or via 07759 952972. Charlie McKenna is also the AAETO Company Secretary and Data Protection Officer.

Our correspondence address is HOLEX National Office, PO Box 145, Worcestershire, WR12 7ZQ.