

Privacy Policy for voicemag.uk – operated by Upstart Projects

Summary of Privacy Notice

Upstart Projects will make every effort to protect the personal information that you provide us and are committed to respecting your right to privacy. By personal information we mean your name, contact details and any other information you give us.

- If you are under 16, please check that your parent or guardian is happy for you to use our website
- Please keep your personal details accurate and up-to-date in your profile page
- We only collect personal information from you when you register on the website or access specific content
- We do not sell your personal details on. We may share this information only with organisations we hire to run our website or partners offering qualifications advice, such as Trinity College London, or where we are required to do so by law.
- We do not use 'remarketing' and do not promote adverts to you elsewhere on the internet based on how you use of our site.
- Upstart Projects and Trinity College London are co-controllers of data related to Arts Award and Trinity qualifications (including data in the user profiles of users who tick to confirm they are/have participated in or are running these qualifications or support programmes)
- We may contact you occasionally for monitoring, evaluation, or marketing purposes but you can control whether to receive mass email communications when you register or at any time in your user profile (and also unsubscribe with the link in emails you receive).
- We use cookies - little bits of computer code that help personalise your experience of the website. They do not give us access to your computer or personal details but we do use them to associate your IP address / login for the purposes of website monitoring and analysis.
- This Privacy Policy forms part of the Terms of Use and covers voicemag.uk and your communication with our presence on third party websites such as facebook.com, called "the Websites".
- It describes how Upstart Projects CIO ("we", "us" or "our") collects, protects and uses the personal information we collect on our Websites. The data controller for the Websites is Upstart Projects who can be contacted on hello@upstartprojects.uk.

We recommend that you look at [our advice for staying safe online](#). You can also find out about controlling your cookies at <http://www.youronlinechoices.com/uk/>.

If you have any requests concerning your personal information or any queries as to how we use your personal information please contact.

The Privacy Notice

This is privacy notice by Upstart Projects CIO covering all engagement participants, users, volunteers and customers may have with us through our live projects, our websites (voicemag.uk, upstartprojects.uk) and social media channels on which we operate.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to let you know how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection laws protect you.

Our privacy notice is provided in sections as below. We may update this notice from time to time and we will let you know any significant changes through notifications on our site..

- 1. WHO WE ARE AND IMPORTANT INFORMATION**
- 2. THE PERSONAL DATA WE COLLECT ABOUT YOU**
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- 4. HOW WE USE YOUR PERSONAL DATA**
- 5. WHO WE SHARE YOUR PERSONAL DATA WITH**
- 6. INTERNATIONAL TRANSFERS**
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- 11. QUERIES, REQUESTS OR CONCERNS**

1. WHO WE ARE AND IMPORTANT INFORMATION

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of any of our websites, including any data you may provide when you register for an account, join our mailing list, join our alumni network for Trinity College London/Arts Award or register for one of our events or projects.

This website is not intended for young children and we require that anyone under the age of 16 to gain consent to register on the website from their parent or guardian who has had the opportunity to read and understand our privacy policies and the terms and conditions of use. If you register to the site and are under 16, you confirm that you have gained this consent.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller(s)

Upstart Projects CIO is the controller and responsible for your personal data (collectively referred to as "CHARITY", "we", "us" or "our" in this privacy notice). Our contact details are hello@upstartprojects.uk or you can write to us at Upstart Projects, 59 Trinity Street, Shrewsbury, SY3 7PQ. Trinity College London acts as a co-controller for data submitted by anyone who is taking part in Trinity College London programmes and who indicates this on their user profile. Their separate privacy policy is available at: <http://www.trinitycollege.com/site/?id=9>

Third-party links outside our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

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

- **Identity Data** includes the personal characteristics, name, date of birth and information submitted to us on our user registration / profile page.
- **Contact Data** includes email addresses and any postal or contact telephone numbers you provide us when entering a competition, registering for an event or project that we run.
- **Usage Data** includes information about the pages you visit on our website and the platforms you came from to our website, associated to you only where you log in to the site.
- **Qualifications Data** includes any information you submit about your participation in, running or support of Trinity College London qualifications, including start/completion dates and your interests.
- **Financial Data** includes your bank account or payment method information ONLY when you make payments to us or request that we make a payment to you.

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

We do not collect any **Special Categories of Personal Data** about you on our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you take part in one of our projects we may ask you to volunteer this information at your will and we will store and process this data on a separate system to this website, using strict internal procedures. This internal process also applies to anyone applying for a job or volunteering role with us who is subject to a

Disclosure and Barring Services check. Financial data you provide to allow us to pay you is also treated with the strictest of privacy and is again subject to our internal procedures.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data 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 competition prizes). In this case, we may have to cancel the contract but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you. These methods include:

- **Directly.** You may give us your Identity, Contact, or Qualification programme by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Create an account on our website
 - Subscribe to our mailing list
 - Request materials to be sent to you
 - Sign up to join a project (such as our Voice Contributors network)
 - Request information about or register for events or competitions we run
 - Register for any of our further services.
- **Directly within a financial transaction.** When you send us your details to make payments, or you make a payment to us.
- **Indirectly.** When you log in to our websites we may record the pages visited (please note we ONLY track usage on our own websites and do not follow you to other platforms or sites).

4. HOW WE USE YOUR PERSONAL DATA

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

- **To enable you to use our website.** We require you to log in to some areas of the website as it is designed for certain groups, including those undertaking Trinity College London programmes. We also collect your email address to enable you to receive system notifications from our websites. We also use Cookies and IP addresses to keep you logged in, to help keep the site secure, enable you to perform searches on the site and help us to identify any functional problems.
- **To send you information** about new web content, opportunities and activities. You can opt in to further communications from us beyond the standard system notifications above. You can always unsubscribe from our emails or opt out of them at any time in your user profile.
- **Performance of Contract** which means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, you've registered for an event or project we run).

- Legitimate Interest** which means our interest in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please [contact us](#) if you would like further information about how we assess our legitimate interests against any potential impact on you.
- To comply with a legal or regulatory obligation** This means processing your personal data where it is necessary for us to comply with a legal or regulatory obligation that we are subject to.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

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

Purpose/Activity	Type of data	Lawful basis for processing data and useful information
To register you for using our website	(a) Identity (b) Contact (c) Qualification programme	Consent given when you actively register. You can request deletion of your account or modify any data at any time.
To monitor the performance of our website and analyse how it is used	(a) Usage	Performance of our contracts. We report to funders and programme partners about the use of our websites – but we will never provide personal details submitted in user profiles
To send information about upcoming opportunities, events and content on our website	(a) Contact	Consent given on registration and/or in your user profile. You can withdraw consent anytime.
To communicate with you about any queries you send us – via email, phone or any other method	(a) Contact	Legitimate Interest. In order for us to reply to you we must know how to communicate with you. This information may be stored with our service providers for email, telephone and similar services. We can delete this information when requested to do so if you tell us what data you want removed.
To process financial transactions	(a) Financial	Performance of a contract – for us to receive a payment from you or make a payment to you. This data will typically

	(b) Contact (c) Identity	be held for the purpose of auditing and legal compliance.
Verifying your participation in Trinity College London programmes which we run on their behalf eg Arts Award	a) Qualification programme	Consent. Data is explicitly provided when you register on the site or update your profile.
To operate our website efficiently and enable you to use it	(a) Usage	Consent. To enable our website to operate and for us to keep it secure we use certain cookies and monitoring of IP addresses. We only use these to identify you as an individual if you've logged in.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may send you email communications about our opportunities, events, content and offers. Where you have told us about your interests (such as Theatre) or engagement in a Trinity College London programme then we may 'segment' some of our email communications to ensure you receive the most relevant information. We only use Voice profile data for this purpose and do not combine it with any other data collected for live projects, financial transactions or similar.

Third Party Data Sharing

We never sell your personal data or provide access to a third party for their own purposes. Third parties may have access to data only where they are under contract with Upstart to provide a service for us, and they may not use it for any other purpose. For example, some of our suppliers currently include:

Who	Why / What data
Mailchimp	Profile data used to send you mass email communications which may be segmented to your interests.
Cloud Artisans and their service suppliers	All information stored on the website is managed by Cloud Artisans Ltd who have access only to support our management of the website and provide you with system notifications or access.
Google Inc and Helpmonks LLC	Emails you send us may be stored and processed by our email inbox providers.
Google Inc, Dropbox Inc, Algolia Inc	Storage of our project files and data which enables us to run the website, our organisation and provide our services.
Trinity College London	Any data submitted as part (or informing us) of your engagement in Trinity College London programmes including Arts Award.

We will tell you explicitly if we need to pass any data to a third party in order to perform a contract we may have with you – such as using your name and email address to order an e-voucher you have won.

Opting out

You can ask us to stop sending you marketing messages at any time by unchecking the box in your user profile edit screen or using the link provided in every mass email communication.

Where you opt out of receiving these marketing messages, this will not apply to the personal data you have provided us for managing your account more broadly, live project engagement and financial transactions – any purposes for which we might need to hold your data to comply with the law, keep you safe or fulfil a contract for any other service you have with us.

Cookies

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. You can find out more about the use of cookies on <http://www.allaboutcookies.org/>. We use cookies to identify you when you visit the Websites and to keep track of your browsing patterns and build up a demographic profile. We also use cookies to analyse who has seen which of the pages on the Websites and to determine the most popular areas of the Websites so that we can improve and develop them.

Our use of cookies also means that we can give registered users a personalised version of the Websites and access to information about their account.

No personal information is stored in the cookie that is issued by the site. The value stored in the cookie is an anonymous identifier, which is not linked to any other personal information you may give us during your visit.

If you do not wish to receive these cookies you can disable them in your browser, though doing so may affect the functionality of our website. Please refer to your browser instructions or help screen to learn more about how to do this. However, should you decide to disable any cookies we place on your computer you may not be able to use certain services or facilities on the Websites.

You can also find out more about controlling your cookies at <http://www.youronlinechoices.com/uk/>.

Change of purpose

We will only use your personal data 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 find out more about how we may process data for a new purpose that is compatible with the original purpose, please contact us.

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

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

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below as outlined in section 4 above.

- Suppliers to us in managing our website and services as identified in section 4 above.
- Project partners who are directly engaged in delivering or managing a project on our behalf, in consortium with us, or who may have commissioned Upstart Projects. Where project partners are involved we will always specifically state this upon initial registration or an expression of interest form.
- Other third parties may access your data when working with us in these circumstances:

- Providers acting as processors in an administrative and IT capacity which may change from time to time. We have contracts with everyone and have identified their privacy policies in an internal audit undertaken in May 2018.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide services that allow us to comply with our legal duties, especially those in relation to our accounting and banking provision.
- HM Revenue and Customs, regulators and other authorities acting as processors based in the United Kingdom (or who comply with UK privacy laws) who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our operations or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new controllers may use your personal data in the same way as set out in this privacy notice and will inform you of such a change.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Some of our providers are based outside of Europe. All suppliers are subject to the conditions we've specified in section 5 and we have undertaken a full audit to identify the location of suppliers and ensure they have the appropriate and compliant mechanisms in place for handling the data we store with them.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

By law we have to keep basic information about our customers who engage with us in financial transaction for the period specified by the UK tax authorities. We must also keep a record of certain details provided on registration / consent forms when you take part in one of our projects or provide media and case study materials for verification and reporting purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information. This includes information you share in your user profile

In some circumstances we may anonymise your personal data (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.

9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request that your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as 'the right to data portability'), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests or in performance of a task in the public interest/exercise of official authority; direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact us.

No fee required – with some exceptions

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version of the privacy notice was last updated on 9 April 2019. You are welcome to contact us to request a previous version although we recommend that you save a copy from the day you have read and agreed to this policy.

We may update this policy from time to time, especially where specified data processors change or we collect new or other information. Updates will be made to this policy and you can check the notice date here. We will post on Voice any changes which materially affect our relationship with you and how we treat or process your data.

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

11. QUERIES, REQUESTS OR CONCERNS – HOW TO CONTACT US

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us on hello@upstartprojects.uk or by post at Upstart Projects, 59 Trinity Street, Shrewsbury, SY3 7PQ. The person responsible for data protection strategy and practice is Emrys Green.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.