**PRIVACY POLICY**

**Updated 23 April 2020**

**Your privacy matters to us**

We are committed to be transparent with you about the data we collect about you and how it is used and shared. By using our Services, including applying for a place on a coding course, joining our community, or applying to become an instructor, you consent to our use of your data under this Privacy Policy. The document below has been created by Code First Girls whose companies house registered name and address is as follows:

ENTREPRENEUR FIRST C.I.C. (Trading as Code First Girls)
℅ BWB Secretarial Limited
10 QUEEN STREET PLACE
LONDON
UNITED KINGDOM
EC4R 1BE
Company No. 07810542
Information commissioner's office ref: ZA221273

**1. Information we collect**

We do not share your contact details with any other third parties without your consent. We do not sell your contact information or use it for marketing purposes other than to inform you of opportunities available to you as part of the Code First Girls community.

**1.1 Applying for a place on a coding course**

When applying for a place on one of our coding courses, you will first be asked to apply and register on our community platform, Arlo, and should you be successful you will be placed in a slack channel. If you do not want to be placed in a Slack channel please contact programmes@codefirstgirls.org.uk

**1.2 Applying to join our community or respond to an opportunity**

As part of the registration process to join our community or apply for a Code First Girls opportunity, you will be asked to include:

* Name
* Email
* Phone Number
* Email Address
* Gender
* Ethnicity
* Education Status
* University
* DOB
* When do you leave school
* What will be your highest qualification
* Country of Residence Nationality
* Do you have the right to work in the UK
* Level of tech experience
* Newsletter
* What Stage are you at in your career
* What sectors would you like to hear about Link to your
* Optional LinkedIn Profile
* How did you hear about Code First Girls

This information will be collected and stored on Typeform, Arlo and when necessary our secure company drive. The only parties who can contact an individual using their email address is Code First Girls, except where the individual has specifically agreed to share his or her email details with any other parties on the platform.

As part of Code First: Girls reporting, we will download data from Arlo and Typeform in order to conduct analytics about our community.

This information is shared with Code First Girls for the purposes of processing your community membership or an opportunity request.

**1.3 Applying for a role as an instructor**

When applying be one of our course instructors, you will first be asked to share your cv and undertake a telephone/online interview. If successful, you will then be asked to register on our community platform Arlo. In addition, your details will be added to slack which we will use to communicate with you about volunteering, freelancing and other community activities.

**1.4 Your cv data and other interview details**

If you respond to an opportunity or request to be a volunteer instructor your cv, answers to any interview questions, in addition to any professional references or eligibility requirements will be collected and stored on the Code First Girls secure company drive. The details will be used by Code First Girls to manage and process your application, and to communicate with you about other Code First Girls commercial, volunteer and community opportunities. We do not share your information with external parties without your consent. If you become an instructor, you will be additionally asked to join a Slack channel for the course you are teaching.

**1.4 Our clients and Commercial partners**

As part of the commercial work we do, Code First Girls collects information which helps us administer our work. This includes:

* Name
* E-mail address
* Organistation
* Job title
* Phone number
* Communications

These details will be stored on Salesforce. Code First Girls may use this information to contact our clients and partners for marketing purposes relating to our commercial work. We do not share your information with external parties without your consent.

**1.5 Job applications to work as a Code First Girl’s employee**

If you apply for a position at Code First Girls, you will be asked to complete an application form on Typeform. You will be asked to submit your CV as well as share your name, email address, phone number and career history. This information will be stored on our company drive (secured Google drive). Your application will be treated in strict confidence. We do not share your information with external parties without your consent.

**1.6 Cookie policy**

As described in our Cookie Policy, we use cookies to recognize you and/or your device(s) on, off and across different Services and devices. You can control cookies through your browser settings and other tools.

**2. How we use information we collect**

The legal basis on which we collect and process your data is “legitimate interest”. This is because we collect and store your data in order to process your course application, application to become a volunteer instructor, or application to a role with one of our partner companies, or for other reasons which enable you to contribute to the mission of Code First Girls. To find out more about this legal basis, click [here](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/).

**2.1 For course applications**

We may contact you by email during and after the course to check your progress, address any attendance issues and send your course completion certificate. We also send you an invitation to join a Slack channel group with other learners on your course, so instructors can keep you informed of learning tips and other administrative matters relating to the course.  As part of your course application, you are invited to sign up to our [monthly newsletter on an opt-in basis.](https://www.codefirstgirls.org.uk/cfg-newsletter.html)  Your name and email address will be shared with course applicants via the Slack channel group, so as to foster a community of learners who can network with and support one another. If you do not wish to join the Slack channel group, please let the Code First Girls team know by emailing programmes@codefirstgirls.org.uk.

We do not share your contact details with any other third parties without your consent. We do not sell your contact information or use it for marketing purposes other than to inform you of opportunities available to you as part of the Code First: Girls community.

**2.2 Code First Girls community surveys and career opportunities**

From time to time we may email you to ask you about your career progression and insights about your current position. We rely on responses to these surveys to demonstrate to our corporate sponsors and other interested parties our progress towards our mission of getting more women working in the tech sector. We may also contact you with invitations to our events and news of career opportunities with our partner organisations.

**2.3 Volunteer instructors and host organisations**

If you volunteer to become a course instructor, we will use the information you share with us to assess your suitability as a Code First Girls instructor. We will store your details on our secure company drive. We may email you from time to time to inform you of changes to our course curricula, opportunities to apply to undertake paid work, and to keep you up to date with Code First Girls activities. As part of your instructor application, you may be invited to sign up to our [monthly newsletter.](https://www.codefirstgirls.org.uk/cfg-newsletter.html)

If you decide to host courses as a company or university, we will use the information you share with us to correspond with you about the course hosting. We will store your details on our secure company drive for use by the Code First Girls team. We may email you from time to time to inform you of updates to our free course activities.

We do not share your details with any other third parties. We do not sell your information or use it for marketing purposes.

**3.  Your rights, choices and obligations**

**3.1 Your rights**

Data protection law provides you with rights in respect of personal data that we hold about you, including the right to request a copy of the personal data and request that we rectify, restrict or delete your personal data.

If you would like to exercise any of these rights, please email us at programmes@code firstgirls.org.uk. Please note that requests to exercise data protection rights will be assessed by us on a case-by-case basis.

If you have a complaint about how we handle your personal data, please get in touch with us at programmes@codefirstgirls.org.uk.  If you are not happy about the way a complaint has been handled, you have the right to refer your complaint to the [Information Commissioner’s Office](https://ico.org.uk/).

**3.2 Data retention**

We will retain your data for as long as necessary to provide our services to you and fulfil transactions you have requested, or for other purposes such as collecting longitudinal data about our community’s career progress. Because these needs can vary for different data types in the context of different Products or Services, actual retention periods can vary significantly. If you wish us to delete your data at any time, please email programmes@codefirstgirls.org.uk.

**3.3  Rights to Access and Control Your Personal Data**

You can request a copy of the data we hold about you, or request that we delete any data we hold on you. You can also ask us to correct, update or delete any inaccurate personal data that we hold about you. Just email us at programmes@code firstgirls.org.uk at any time.  We aim to process requests for data records or deletion within two weeks of receipt.

**3.4  Data Access and Portability**

You have the right to request a copy of the personal information we hold about you in a structured, electronic format. If you wish to receive a copy of the information we hold about you, please email programmes@codefirstgirls.org.uk

**4. Security**

From time to time weimplement and update administrative, technical, and physical security measures to help protect your information against unauthorised access, loss, destruction, or alteration. However, the Internet is not a 100% secure environment so we can’t guarantee the security of the transmission or storage of your information.
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**4.1 Data breach/leak response**

Entrepreneur First CIC is registered with the ICO, and if a data breach, leak or other unauthorised access to data outside of the scope of the purpose and consent the data was collected for use under should occur, you can expect Entrepreneur First CIC to respond to the situation in line with [Guidelines provided by the ICO](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/); namely:

* As soon as we are aware of the data incident we will undertake an assessment to understand the likely risk to individuals as a result of a breach.
* We will notify the ICO of a breach within 72 hours of becoming aware of it, even if we do not have all the details yet.
* We know what information we must give the ICO about a breach, which is as follows:
	+ a description of the nature of the personal data breach including, where possible:
		- the categories and approximate number of individuals concerned; and
		- the categories and approximate number of personal data records concerned;
	+ the name and contact details of the data protection officer or other contact point where more information can be obtained;
	+ a description of the likely consequences of the personal data breach; and
	+ a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.
* We have a process to inform affected individuals about a breach when it is likely to result in a high risk to their rights and freedoms.
* We know we must inform affected individuals without undue delay.
* We know what information about a breach we must provide to individuals, and that we should provide advice to help them protect themselves from its effects.
* We document all breaches, even if they don’t all need to be reported.

**5. Changes to this privacy policy**

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the Code First Girls website and update the “Last Updated” date at the top of this Privacy Policy. If you disagree with the revised Privacy Policy, you may ask us to remove your information from our systems.

**6. Contact**

If you have any questions or complaints about this Privacy Policy or our information handling practices, you may contact us at our correspondence address:

Code First Girls
Campus London 4th Floor
4-5 Bonhill Street
London
EC2A 4BX

You may also emailus at programmes@codefirstgirls.org.uk stating 'Data inquiry' in the subject title.