



Privacy Policy (updated 18th May 2018)

Who we are

Stay Nimble is a social enterprise dedicated to helping people realise their employability as the nature of work rapidly changes. We support people in understanding their natural abilities and how these can be directed to new work in their local economy.

Stay Nimble is registered as a limited company (company number 11129024).

Policy summary

Stay Nimble (“we”) promises to respect any personal data you share with us, or our partner organisations, and keep it safe. We will be transparent when we collect data and will not do anything you wouldn’t reasonably expect.

Developing a better understanding of our customers through their personal data allows us to make better decisions, support people more efficiently and, ultimately, help people to find work that is financially and emotionally rewarding.

Our marketing communications include information about our latest work, case studies and the services we provide. If you would like to receive such communications but have not opted in, please contact us at info@staynimble.co.uk or visit www.staynimble.co.uk

Data Protection

In carrying out our normal activities, we process and store personal information relating to our customers and we are therefore required to adhere to the requirements of the Data Protection Act 1998. We take our responsibilities under this act very seriously and ensure personal information we obtain is held, used, transferred and processed in accordance with that Act and all other applicable data protection laws and regulations including, but not limited to, the Privacy and Electronic Communication Regulations and General Data Protection Regulation.

The ways we collect data

i) You may give it to us directly

You may give us your information when you sign up to our newsletters, purchase a subscription or an event registration, tell us your story, build your profile, or communicate with us. We never use third-party agencies to collect personal information.

ii) You may have your details passed on by a contact or family member

A friend or relative of yours may pass on your details to us for a specific purpose. For example, if they think you might benefit from our services, they may invite you to join the platform. We will not further process your data or contact you without you telling us you would like further contact.

iii) You may give permission for other organisations to share it, or it is available publicly

We don't do this yet, but we want to let you know that we are looking at how to make it easier for you to build your profile more efficiently. In the future, we may get information from other organisations. This information comes from the following sources:

Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook or Twitter, you might give us permission to access information from those accounts or services.

Information available publicly

This may include information found in places such as Companies House or through the electoral roll and information that has been published in articles/newspapers.

iv) It may be collected when you use our website

Like most websites, we use "cookies" to help you use our website with ease. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer, phone or tablet. They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

The type of device you're using to access our website may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. This is to make our website widely accessible on a range of devices and operating systems and to help us fix bugs that stop you using our website effectively. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

The data we collect and how we use it

The type and amount of information we collect (and how we use it) depends on why you are providing it and what you tell us you would like us to do in the future.

Customers

If you are one of our amazing customers, we will usually collect data that includes:

- Your name
- Your email address
- Your payment, bank or credit card details
- Your aptitude assessment scores
- Your current employment status
- The town or city in which you live

Your data will mainly be used for:

- Providing you with the services, products or information you have asked for
- Processing any subscriptions you have agreed to
- Asking you to help others in the Stay Nimble community by sharing your story
- Keeping a record of your relationship with us
- Ensuring we know how you prefer to be contacted by us
- Understanding how we can improve our services, products or information.

We may also use your personal information to detect and reduce fraud and credit risk.

Credit, debit card payment information

When you use your credit or debit card to pay for your subscription, we will ensure that this is done securely and in accordance with the Payment Card Industry Data Security Standard. Find out more information about PCI DSS standards by visiting their website at www.pcisecuritystandards.org.

We do not store your credit or debit card details in full, following the registration of your card.

To process payments made through our website we use third-party payment merchants called Stripe Payments Europe Ltd ("Stripe"), PayPal Ltd ("PayPal"), and GoCardless Ltd ("Go Cardless"). All are internationally trusted payment service used by millions of online retailers and international businesses and individuals. They have stringent security and data processes to protect your data. Stripe and PayPal may use, retain and disclose your personal information and credit card details for this purpose and as set out in their privacy policy, including transferring your data outside of the European Economic Area (EEA). Where such transfer occurs, they ensure your data is adequately protected under UK data protection law.

Legitimate interest and targeted communications

In some instances, we may collect and use personal information where this is necessary in our legitimate interest to support you find work. We only ever collect this data within the confines of the law and within your rights as an individual. To provide an improved experience for you, we occasionally use profiling and screening techniques to ensure communications are relevant and timely. This also allows us to target our services effectively; helping you when you need help.

When building a profile, we analyse the information you have freely provided to us relating to your interest and experiences, in order to better understand your interests and preferences and to contact you with the most relevant communications. In doing this, we may use additional information using publicly available data about you.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Policy and that does not intrude on your privacy or previously expressed contact preferences.

Direct marketing

We would like to keep you updated with our work and show you how being part of the Stay Nimble community helps others to succeed in their lives. If you opt in to be contacted, we will contact you using the methods (email only) that you have specified. We may include invites to events and may ask for other support.

We only want to contact you in the way that you like and strive to make it easy for you to tell us how you want us to communicate with you. If you do not want to hear from us, just let us know when you provide your data, follow the unsubscribe link on emails, or contact us at info@staynimble.co.uk.

We will never sell or share personal details to third parties for the purposes of their marketing.

Partners

We do work with carefully selected partners to provide the services. This is because it is the most cost effective way of fulfilling these. We only work with partners who comply with all current data protection legislation. Any personal information (including names and email address) sent to the partner is encrypted and protected to ensure your data is safe.

Sharing your story

You may choose to tell us about your experiences of career change, using our services or your direct or indirect experience with supporting others with finding new work. This may include you sharing sensitive information in addition to your biographical and contact information. This information is always stored securely and will never be used without your permission.

We may use some of the information provided in your story, including gender, age, or a specific experience, to inform our marketing. This is so that those with an interest in a particular area will hear about related work.

If you have provided your story, and have given explicit and informed consent (or have consented as a parent or guardian if the story relates to a person under 18), this information may be made public by us in materials promoting our services, or in documents such as our annual report. We will always seek permission.

Children's data

At times, we may need to collect and manage information about people under the age of 18. Information is usually collected when children either sign up to our services, or a parent / guardian signs up on their behalf. We will always keep this information secure and will never knowingly send marketing material to children.

Anyone of any age is able to sign up on our website and opt in to receive marketing material. If a child signs up in this way, we will not be aware of their age. In this circumstance, they may receive marketing material. If your child is receiving marketing or fundraising material and you wish this to stop, please contact us at info@staynimble.co.uk.

How we keep your data safe and who has access

We ensure that there are appropriate controls in place to protect your personal details. For example, online forms on our website are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff. Anyone with access to personal information must sign a confidentiality agreement as part of their contract which, among other things, includes strict regulations on the processing of personal data.

Where we use external companies, such as partners, to process personal data on our behalf, we undertake comprehensive checks on these companies before working with them. We have contracts in place that set out expectations and requirements, especially regarding how they manage the personal data they have access to.

We may disclose your personal information to third parties if we are required to do so through a legal obligation (for example, to the police or a government body); to enable us to enforce or apply our terms and conditions or rights under an agreement; or to protect us, for example, in the case of suspected fraud or defamation.

We will never sell your details to any third parties and do not share personal data with any third parties other than in the circumstances already outlined.

Your right to know what we know about you, make changes to, or ask us to stop using your data

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (for example, processing your subscription or delivering our service to you) we will do so. To make a request please contact us at info@staynimble.co.uk

Please be aware that we will always use the most recent information you provide us.

If at any time you find you have inadvertently opted out of contact, you can re-join the mailing list online at www.staynimble.co.uk

You have a right to ask for a copy of the information we hold about you, although we may charge £10 to cover the costs involved. If you spot any discrepancies in the information we provide, please let us know and we will correct them.

To make a request, send a description of the information you want to see and proof of your identity by post to: Data Protection, Stay Nimble, 20 – 22 Wenlock Road, London, N1 7GU. For security reasons, we must handle these requests in writing, by post and only when you provide proof of identity. This is to ensure your data is secure and we are not sharing it with someone else.

If you have any questions, please send them to info@staynimble.co.uk and for further information, see the Information Commissioner's guidance on the ICO website.