

## Privacy notice for Brightside's online mentoring platform

**This privacy notice was last updated on 26 January 2024.**

Welcome to Brightside, where we are committed to protecting and respecting your privacy. This privacy notice explains how we handle your personal data, which is any information that could identify you. It covers what data we collect, how we store it, and how we use it, including any information we may have already collected before you read this notice.

**Brightside services:** This privacy notice applies to your use of Brightside's charity website, Bright Knowledge website, and the Brightside online mentoring platform (collectively referred to as the "Brightside services") and forms part of our terms and conditions.

**User agreement:** If you're a mentee, mentor or coordinator (we call you "platform users") on Brightside's online mentoring platform. As a platform user, when registering your online mentoring account, you will need to acknowledge that you have read and understood this privacy notice.

**Updates:** We may update this privacy notice, so check this page now and again for any changes. We'll let you know about updates by putting a banner on our home page for a while, and we'll change the "last updated" date above. If there are significant changes, we may email you directly.

**GDPR Compliancy Statement:** Brightside complies with the General Data Protection Regulation (GDPR) to make sure we handle your personal data lawfully and transparently. Your privacy matters, and we're dedicated to keeping your information safe. This privacy notice will be reviewed each year to ensure it remains fit for purpose and compliant with relevant legislation.

**Contact us:** If you have questions or concerns about this privacy notice, feel free to **contact us**. You can find details on specific parts of our privacy notice by clicking on the links below.

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## 1. Why we collect information

We follow the data protection laws that apply to how we collect, use, and process your personal information. The way we handle your data, as explained in our privacy notice, is necessary for our legitimate interests as a social mobility charity and the interests of our contracted partners.

These purposes are outlined in the privacy notice, Brightside services agreement, or the specific services themselves.

However, there are some important things you should be aware of:

- We'll only reach out to you regarding services you've shown interest in, signed up for, or other products, services, or features that Brightside and/or our contracted partners think you might find interesting
- We may collect, use and process information related to your health and other personal details, in particular, sensitive categories (as discussed below in 'What kind of information we collect'). This is allowed on a special legal basis because it is necessary for providing confidential mentoring, advice, or support services through our moderated messaging platform, involving your mentor, Brightside, and contracted partner(s)
- On occasion, we may be required by law to disclose your personal information (e.g. to protect you from harm)

## 2. What kind of information we collect

When you use the Brightside services, we collect and process various information to enhance your visit and provide you with the best possible experience.

This information may include:

- Information you directly provide to us, such as when you register for or use our online mentoring platform, subscribe to our newsletter, or complete an online survey
- Information transferred to us from contracted partners if you've been invited to use our online mentoring platform
- Content uploaded or posted by you, your mentor, or mentee on the Brightside online mentoring platform during your use of the Brightside services, including any participation in online surveys, video calls, questionnaires, or forms
- Information provided through other means, such as emails, video, phone calls, or during meetings with us, your online mentor, coordinator (someone with a Disclosure and Barring Service (DBS) enhanced clearance authorised by Brightside and/or its contracted partners to manage an online mentoring programme) or our contracted partners

This information may include the following:

- **personal contact details**, including your name, postcode, mobile telephone number and email address
- **biographical details**, including information about your employment or education and DBS/security checks where applicable

- **demographic information**, including information in relation to your age, gender, interests and hobbies
- **sensitive information**, such as ethnicity
- **statistical information**, relating to your use of the Brightside services, including course progression, messages sent and received, and number of visits to the Brightside services

If you're a mentor or mentee, the information collected also includes a wide range of data posted or uploaded to our mentoring platform during your and your mentoring partner's use of the Brightside services.

This might involve limited personal information considered sensitive by data protection law, which you or your mentoring partner may include in conversations on the platform. This sensitive information could relate to physical or mental health, religious beliefs, political opinions, racial or ethnic origin, or criminal convictions. Importantly, sharing information in these categories is entirely voluntary, and we only use it for providing the Brightside services to you.

We may also collect certain types of information automatically, including:

- your internet protocol (IP) address or device identifier
- your device's operating system and browser type
- details of the websites visited before or after you visit our website
- pages viewed and activities undertaken whilst using the Brightside services

### **3. How we use your information**

Brightside may use your information for the purposes outlined in this privacy notice or as otherwise communicated to you in the Brightside services agreement or within the services themselves. This includes:

- Setting up a service user account for your use of the Brightside services
- Carrying out the Brightside services for you and our contracted partners, including day-to-day operations, meeting charitable objectives, and complying with legal obligations
- Communicating with you about your use of the Brightside services
- Tailoring our services to you and our contracted partners, with a commitment to anonymising any information used for this purpose to protect your identity
- Using information for monitoring, evaluation, research, and reporting related to the Brightside services, always anonymising data to protect your identity
- Marketing purposes related to the Brightside services, as well as services you've shown interest in and other goods, services, and features believed to be of interest. Each time you are contacted, you will be informed about how to opt out if you do not wish to be contacted again by that person

### **4. How we may share and disclose your information**

Your privacy is very important to us. We will not share your personal information with anyone outside of Brightside, other than with any contracted partner and online coordinator relevant to your mentoring programme, or your use of the Brightside services and our service providers that enable us to provide the Brightside services to you, except in the very limited circumstances explained below.

The mentoring platform does allow you to share personal information with your mentor/mentee and/or groups of mentors/mentees within your mentoring programme.

### **Service providers and international data transfers**

Some of our third-party service providers may host personal information outside the European Economic Area (“EEA”). All our service providers are UK GDPR compliant and for each supplier we have confidentiality, and/or other contractual agreements in place.

We rely on the use of International Data Transfer Agreements (“IDTAs”), which the Court of Justice of the European Union (“CJEU”) validated on February 2, 2022, as an appropriate safeguard for restricted transfers of personal data. IDTA’s ensure that data subjects are given the same level of protection as they would have been under the UK GDPR.

### **Evaluation and research**

We also keep track of the educational progress of mentees after they have completed mentoring programmes, so that we can assess the effectiveness of the Brightside services and improve them for future mentees.

To keep track of your educational progress, if you are a mentee, we may provide basic information about you (sufficient to allow you to be identified) to evaluation, research and other educational partners so that they can disclose information about your progress to us or otherwise assist us with monitoring and assessing your progress.

We do not use these results in any way that might affect you individually, but only as part of our assessment of our mentoring programmes. If you do not wish us to use and share your information in this way, please let us know (see [contact us](#)).

### **Safeguarding**

In exceptional circumstances where a mentee or mentor is deemed to be at risk of significant harm or to have suffered significant harm, or to be a danger to another person, mentoring confidentiality may need to be broken.

The mentee or mentor will be informed of our intended action, or in exceptional circumstances the action may already have been taken before the mentee or mentor can be informed. In addition,

Brightside reserves the right to use or disclose any personal information as needed to satisfy any law, regulation or legal request, to protect the integrity of the Brightside services, to fulfil your requests, or to cooperate in any law enforcement investigation.

#### **5. How we keep your information safe**

Your personal information will be kept on secure servers and kept confidential by Brightside and, except in the limited circumstances mentioned [above](#), will only be seen by Brightside staff, the contracted partners and suppliers relevant to your mentoring and your online mentoring coordinator. These parties are all contractually obliged to keep your personal information secure and confidential.

From time to time, if you are a mentor or mentee, Brightside staff and your online mentoring coordinator may review messages and other materials posted or uploaded to the platform to protect your safety by ensuring that there is no misuse of the Brightside services or of your mentoring relationship. Brightside and/or our contracted partner(s) may occasionally use statements or comments made by individuals to evidence the impact of our mentoring programmes and/or for marketing purposes. We will always fully anonymise any statements or comments used in this way.

#### **6. How long we keep your personal information for**

##### **Record deletion**

Every year, at the beginning of the next academic year, we will delete all personal identifying information for registered users that is six years old, based on the registration date of each user account, except if the user has been actively using the platform within the last 12 months. The data deletion process is permanent and cannot be reversed.

Any personal identifying information associated with invitations to join the mentoring platform, that are not taken up by the invitation recipient, are deleted when the mentoring programme comes to an end.

As part of our GDPR obligations, [upon request](#), we will delete your personal information from our systems within one month.

##### **Higher Education Access Tracker**

Brightside uses HEAT (Higher Education Access Tracker) to help understand the impact our mentoring programmes have on the education trajectory of our mentees and how this may affect longer-term social mobility in the UK.

HEAT is a secure shared database used by many UK educational institutions to identify which outreach or widening participation activities are the most effective in preparing students for Higher Education and progressing on to employment.

Each year we upload selected mentee data to HEAT, together with some limited engagement metrics from the mentoring programme you participated in. After a year, HEAT will generate a statistical report of the number of our beneficiaries that progressed on to HE. We use this report as well as our own evaluations to evidence the impact of our mentoring intervention in contributing to better outcomes for young people.

HEAT will typically retain personal data uploaded to it for 15 years after a mentee graduates or when they reach 30 years of age (whichever comes first), after which time all personal data will be permanently deleted. Further information on HEAT's Data Retention Policy is

here: <https://heat.ac.uk/data-privacy-participants/>

### **7. How we use cookies**

Cookies are small text files that are placed on your computer by the websites you visit. There are two kinds of cookies: session cookies, which we use to store information relating to your current session on the site but which are deleted when you leave the site, and permanent cookies, which remain on your computer so that our site recognises you when you return.

The information in a cookie may include an encrypted version of your username and a unique identifier for that session. You need to enable cookies on your web browser to use this site.

We also use Google Analytics to provide us with statistical data on how people use this site. Google Analytics cookies are third party cookies set by Google, which include both session and persistent cookies.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

### **8. Third party sites**

This privacy notice applies specifically to Brightside services and does not cover your internet activities beyond this website. It especially does not apply to websites you access through links in the project resources section (or any other section) of our website or Brightside services. Brightside is not responsible for the privacy practices of these external websites.

We recommend reading the privacy statements of other websites you visit through Brightside services to understand their data privacy practices.

### **9. Children's online privacy**

Brightside understands how important it is to keep children's privacy safe. We are committed to not intentionally collecting any personal information from anyone under the age of eleven. If you're sharing info with us, you're telling us you're at least eleven years old.

## 10. Your data protection rights

The GDPR gives you eight data subject rights, which are listed and explained below

1. **Right to be informed:** we will tell you through our privacy notice what data we collect about you and your use of the Brightside services, how this data is being used, how long it will be kept and whether it will be shared with any third parties
2. **Right of access:** you have the right to request a copy of the information that we hold about you. A subject access request will typically take between one and three months to complete depending on the add-on features enabled in your mentoring programme
3. **Right of rectification:** you have the right to correct data that is inaccurate or incomplete. You can do this yourself by logging into your profile page on the mentoring platform and updating the details you registered with, or you can ask us to do this for you by emailing [support@brightsidementoring.org](mailto:support@brightsidementoring.org)
4. **Right to be forgotten:** you can ask us to erase your personal data from the mentoring platform. This is a permanent and irreversible process and means you will lose all access to your mentor/mentee and any mentoring conversations and resources you may have shared. Permanent deletion requests are processed within one month of being received. We will explain the process to you and ask you to confirm you are happy to proceed before taking any action
5. **Right of portability:** you can request that we transfer the personal data that we hold about you to another organisation. You can ask us to do this by emailing [dataprotection@brightside.org.uk](mailto:dataprotection@brightside.org.uk)
6. **Right to restrict processing:** you can request that we limit the way we use your personal data so that we keep it but only make very limited use of it
7. **Right to object:** you have the right to challenge certain types of processing as explained in this privacy notice. You can contact us about this by emailing [dataprotection@brightside.org.uk](mailto:dataprotection@brightside.org.uk)
8. **Rights related to automated decision-making including profiling:** we do not use automated decision making or profiling on any of the Brightside services

All of these rights are subject to various exceptions and conditions. If you would like a copy of all or some of your personal information, or to exercise one of your other rights, please [contact us](#).

You can read more about your rights under GDPR and if you are not happy about the way we have dealt with your request you can complain to the office of the UK Information

Commissioner: [www.ico.org.uk](http://www.ico.org.uk).

## 11. Contact Us

If you have any questions or comments about this privacy notice or Brightside's personal data processing or data protection practices, or wish to:



**brightside**

BRIGHTER FUTURES FOR ALL

- opt out of receiving communications about services in which you have expressed an interest, or other goods, services or features Brightside and/or the contracted partners believe that you will find interesting
- ask us not to disclose information about you to evaluation, research and other educational partners so that we can track your academic progress (see [How we may share and disclose your information](#)) or
- exercise the data protection rights discussed [above](#), please contact us at [dataprotection@brightside.org.uk](mailto:dataprotection@brightside.org.uk). You should also use this email address to let us know if any of your personal data changes

Alternatively, you can write to us at: Brightside, Canopi, 7 - 14 Great Dover Street London, SE1 4YR, or call us on: 0203 096 8120.