



BCS, The Chartered Institute for IT

Data Privacy Notice

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1. Introduction

BCS is committed to ensuring data security and the fair and transparent processing of your data. This privacy notice sets out how we will treat the personal data which you provide to us in compliance with the Data Protection Act 2018 and the General Data Protection Regulations (EU) 2016/679 (GDPR).

This privacy notice contains important information on how and why we collect, store, use and share personal data, your rights in relation to your personal data and how to contact us if you have any concerns about how we process your data.

2. What personal data do we collect?

Personal data, or personal information, means any information about you which could be used to identify you.

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** includes billing address, delivery address, email address and telephone numbers;
- **Financial Data** includes bank account and payment card details;
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses;
- **Usage Data** includes information about how you use our website, products and services;
- **Marketing and Communications Data** includes your preferences in receiving information and marketing from us and our third parties and your communication preferences;
- **Behavioural / Conduct Data** when dealing with Disciplinary matters;
- **Educational, School, Organisational and Career Data** when processing scholarship applications, or joining our Computing at School community.

3. How we collect your personal data

We use different methods to collect data from and about you through:

Direct interactions. You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or in person. This includes personal data you provide when you:

- apply for our products or services;
- correspond with BCS;
- create an account on our website;
- apply for membership or professional registrations;
- call our customer services department;
- register for the learning platform Learning Hub / Springboard provided to BCS members for free;
- subscribe to our service or publications;
- register for an examination or certificate;
- register for an event;
- request marketing to be sent to you;
- process your application for scholarships
- access resources, including videos and podcast recordings;
- participate in surveys; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns including the IP address used; login information; browser type and version, operating systems and platforms. We may also collect information about your visit including the pages you visited; what you searched for; length of visits and methods used to browse away from the page. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our “Use of Cookies” statement on the BCS website <https://www.bcs.org/>

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Contact, financial and transaction data from providers of technical, payment and delivery services based inside or outside the EU;
- Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Where necessary, BCS may collect certain special category (previously known as sensitive personal data) from you. Special category data is classified as information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life or details or criminal offences, or genetic or biometric data). This will only be done with your explicit consent.

4. How we use your personal data

When we ask you to supply us with personal data, we will make it clear whether the personal data we are asking for **must** be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is **optional**. We may use your personal data to fulfil a contract or take steps linked to a contract:

- to provide the products and/or services to you;
- to communicate with you in relation to the provision of the contracted products and services;
- to provide you with administrative support such as account creation, security and responding to issues;
- to provide an improved customer experience by recording calls and using them for training purposes and’;
- to provide you with surveys, information about our awards and events, offers and promotions, related to the products and/or services.

Legitimate Interests

Where the collection of data is necessary for purposes which are in our, or third party’s legitimate interests. These interests are:

- communicating with you in relation to any queries, issues, complaints, examinations, professional membership, financial transactions;
- improving the quality of experience when you interact with our products or services including testing the performance and customer experience of our website;
- improving the quality of experience when you interact with us directly through our customer services department;
- performing analytics on sales or marketing data, determining the effectiveness of promotional campaigns;
- dealing with disciplinary cases of BCS members.

Contract

Where there is a contract between BCS and your centre, training provider, school, hub or employer we will be processing your data to fulfil our obligations under such contract.

Consent

Where you have given your express permission to receive marketing communications, we may use your data to send you newsletters, surveys, information about our awards and events, exam, offers and promotions, related to products and services which may be of interest to you.

Where required by law

We may also process your personal data if required by law, including responding to requests by government or law enforcement agencies or for the prevention or crime or fraud.

Purposes for which we will use your personal data

Below is a description of the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member	(a) Identity (b) Contact	Performance of a contract with you
To make an assessment for award of professional registrations	(a) Profile	Performance of a contract with you
To process and deliver services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Mailing campaigns	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) consent
To manage our relationship including: (a) Notification about changes to our terms or privacy notice; (b) Asking you to leave a review or take a survey. We may cross-reference your survey responses with information that we already hold about you. This would be for research purposes only, unless you expressly request otherwise.	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our products / services)
Recording of calls made to our customer services department.	(a) Identity (b) Contact	Legitimate interest for training purposes & to improve future customer experience.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Register visitors to the BCS offices	(a) Identity	Necessary to ensure the correct person is allowed access to BCS and for Health and Safety and Fire evacuation reasons
To conduct the disciplinary procedure for BCS members	(a) Identity (b) Contact (c) Membership (d) Behaviour	Necessary for our legitimate interests to investigate an alleged infringement of the BCS Member Code of Conduct
To register you for an event (members and non-members) or if you wish to have access to resources such as videos or podcasts	(a) Identity (b) Contact (c) Marketing & Comms	Necessary to know who has registered for an event and to provide follow up information
To take payment	(a) Identity (b) Contact (c) Payment Information	We need this information to complete your purchase.
To process scholarship applications	(a) Identity (b) Contact (c) Education / Career	Consent
Interviewing for Apprenticeships / Examinations	(a) Identity	Consent

Marketing

We may use personal information to send direct marketing communications about our products and services that we feel you will be interested in. This may be in the form of email, post, telephone or by SMS. You can always choose to opt out of receiving direct marketing as all our marketing communications included unsubscribe links, alternatively, you can contact us to stop further communications.

We also carry out customer insight analysis from our interactions with you to help improve our products and services.

Event Booking

BCS uses Eventbrite for the majority of its events bookings and participants will register directly with them. Please refer to their [Privacy Policy](#) for details of how they will process your data. If you require updates, amendments or deletion you should contact Eventbrite directly as they are the data controller. BCS also uses GoToWebinar and again, participants will register directly with them but BCS is the Data Controller and this notice applies.

Role Model

Organisations using Role Model are responsible for maintaining up to date records for staff. For updates, amendments or deletion, you must contact your Role Model administrator directly.

Scholarships

BCS will collect and use your information to process your scholarship application and administer the scholarship scheme. We will share your data with the Department for Education (who is a Joint Controller) who may retain and use your information for the purposes of teacher recruitment and retention statistics. The legal basis for DfE processing this data is that such processing is necessary for them to perform a task in the public interest pursuant to Section 14 of the Education Act 2002. BCS has a data sharing agreement with the DfE for these purposes.

To support you in your journey towards a new career in teaching, we would like to register you with the DfE Teaching Line which is administered by Teleperformance UK Limited. The service offers a Premier Plus service to those who hold (or are predicated to gain) a first class, 2:1 or 2:2 degree). Premier Plus provides tailored advice about initial teacher training, support with your application from a dedicated advisor as well as help in securing school-based experience and invitations to exclusive events. Your data will only be processed in this way if you give your consent to being registered with the DfE Teaching Line. If you do give your consent, then DfE will share your data with Teleperformance UK Limited.

Computing at School (CAS)

As part of our involvement in the activities around the National Centre for Computing Education (NCCE), we are under a contractual obligation to share data with our consortium partners, STEM Learning Limited and Raspberry Pi Foundation. We may also be required to share data for certification and verification purposes. This data will ultimately be shared with the DfE. You can choose to update your preferences at any time by updating your CAS online profile with your preferred communication preferences.

Barefoot Computing

Barefoot Computing is a project run by BCS in association with BT and helps teachers to teach the computer science elements of the new primary computing curriculum. BCS is the data controller and is responsible for your personal data. In order to access our free materials, you need to complete a registration process where we will collect your name, email address, organisation you work for and data relating to your attendance at Barefoot Computing events. We use the information to provide you with access to our materials and carry out administration, statistical analysis and reporting on how the website is used. We will only send you information if you have provided permission to receive information and updates from Barefoot. You can update your preferences or unsubscribe at any time by going to "My Account Settings".

Barefoot resources are playing an integral part in supporting primary school teachers through the National Centre for Computing Education (NCCE) in England. This is managed by a consortium formed of BCS and its partners, STEM Learning Limited and Raspberry Pi Foundation (the "Consortium Partners"). BCS may be obliged to share your registration data and the date of events you may have attended with Consortium Partners in order to fulfil its legal obligations and to offer you additional professional development support and further resources to help you deliver first class computing education to your pupils. Such data will ultimately be shared with the Department for Education as part of the NCCE contractual commitments. We do not share this information with anyone else who is not connected with the Barefoot project or the NCCE. For Barefoot workshops we will send you materials, such as teacher packs, in the post. Your data will be shared with UPS or Royal Mail to facilitate the postage of such materials.

Your data will not be sold or passed on to any other third-party commercial organisation.

Learning Hub/Springboard

One of the benefits of BCS membership is that members can subscribe to a platform called Springboard which supports employee career development through e-learning content solutions. Members will be required to enter their data into the Learning Hub platform if they wish to join.

On-Line Collaboration Apps

BCS and its members use a number of online collaboration apps to engage with each other, these include, but are not limited to Meetup, Basecamp, Campfire, Huddle and Trello. Please note that in some cases, BCS has not approved the use of these apps so caution is recommended. If you are invited to join and enter your details into the following apps, then BCS is not the data controller and you will be responsible for changing preferences and permissions through the relevant app. Please be aware that some of these apps servers are held outside of the EEA.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of the BCS website may become inaccessible or not function properly. You can also turn off advertising by visiting <http://www.youronlinechoices.com/uk/> and adjusting your privacy settings in your browser.

Profiling

Individuals who apply for AMBCS membership will automatically be given AMBCS through an automated process. If individuals apply for other grades and are not suitable, they will be informed that this is the case.

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will 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 share your personal data with other members of staff within BCS when you provide BCS with your information. We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a business need to know it.

5.1 Third Parties

We may also share your personal data with trusted third parties including:

- Service providers contracted to us in connection with the provision of the products and services; this includes the service provider which runs election and voting at our annual general meeting;
- Relevant Regulators such as Ofqual, CCEA Regulation; Department for Education (DfE), Ofsted, Qualification Wales, ESFA, NSAR and BSI;
- RM Results who process data on behalf of DfE;
- Other Awarding Bodies such as ISTQB, APMG and EXIN;
- Disciplinary Investigation Panels and Appeals Panels; *
- Complainants;
- NCCE, STEM Learning Limited and Raspberry Pi Foundation for CAS users;
- BCS CEO;
- Our insurers;
- External and internal lawyers and/or specialist advisors
- BCS may also be bound to share data with the police or other law enforcement agencies in the event of a crime.

*Further information can be found in the Disciplinary Regulations which is available upon request.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security and lawful processing of any personal data shared with them. 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.

5.2 Protecting information outside of the UK

Some of the organisations we share information with may be located outside of the UK. We will always take steps to ensure that any transfer of information outside of the UK is carefully managed to protect your privacy rights. We will ensure that the transfer of personal data will be protected by appropriate safeguards, including the use of standard data protection clauses where the data protection authority does not believe that the third country has adequate data protection laws.

5.3 Extraordinary Circumstances

Occasionally and only where necessary to fulfil our legal obligations, conduct investigations and/or deliver our services, we may share your information with law enforcement organisations such as the police or courts.

5.4 Examination Results

All exam results will be held for a period of 15 years as this is a record of a person's qualifications unless there is a specific request to delete the data via a right to be forgotten request.

BCS will share exam results and marks with the Training Provider as there is a 'reasonable expectation' for this information to be provided. BCS policy is not to share results with any employer (unless they also are your Training Provider), relative or friend unless express consent is obtained to do so. Where BCS works with other Examination Providers (such as ISTQB or EXIN) we will share the exam marks with them.

5.5 Recordings

We may record telephone calls you make to our customer contact centre to train staff or check for mistakes. We do this in the interests of offering a good service to our customers and to protect public funds. Your information may be shared with other organisations if they have a legal right to it.

We also record some interviews, if you are invited to an interview, we may ask your permission in advance of the interview starting or we will use Legitimate Interest as our lawful basis for the recording. We record interviews in the event of a complaint or appeal. We will delete call recording one month after the call was made.

6. How long will we keep your personal data?

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 determine 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.

6.1 Financial Data

BCS will not delete any data which relates to financial transactions that is less than seven years old as we are legally required to hold this information for seven years.

7. Where we store your personal data and how is it protected

We take reasonable steps to protect 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 also have procedures in place to deal with any suspected data security breach. We will notify you and the relevant Regulator(s) such as the ICO of a suspected data security breach where we are legally required to do so.

Where you have a username and password (or other identification information) which enables you to access certain services or BCS portals, it is your responsibility to keep this information secure. Please do not share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to the BCS website; any transmission is at your own risk. Once we have received your personal data, we will use strict protocols and security features to try to prevent unauthorised access.

8. Your Rights

You have legal rights under the data protection laws in relation to your personal data. Read below to learn more about each right you have.

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information when we know we are dealing with the right person.

We will not charge you for any of these requests unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before we proceed with your request.

We will respond to all valid requests within 30 days. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you

know if we think a response will take longer than one month. To speed up our response, we may ask you provide more detail about what you want to receive or are concerned about.

We may not always be able to do what you have asked, for example, if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

8.1 The right to be informed

You can ask us what data we hold on you and what we do with it.

8.2 The Right of Access / Data Subject Access Request (DSAR)

You can ask us to provide you with a copy of your personal data that we hold about you by contacting our legal department at bcs.legalteam@bcs.uk. Please note that BCS will not provide copies of any emails sent to or received from yourself as you already have received this information. We also will not provide any internal emails or documents that may contain your name unless the information contained in the email is:

- significantly biographical with regards to you as the data subject and/or
- you as the data subject were the focus of attention in the document.

We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person or if your request is manifestly unfounded or excessive.

8.2.1 Examination Paper Exemption

Individuals cannot use a Subject Access Request to obtain examination papers or scripts as this is exempt under the Data Protection Act Schedule 2 Part 4 Clause 25. This is because it could compromise the examination papers which may be re-used. In addition, answers to examination questions are also exempt as this is not considered personal data. Examiner reports / comments are disclosable if they have been completed.

8.3 Correcting Personal Information / Right of Rectification

You can ask us to correct any information about you which is incorrect. We will be happy to correct such information but may need to verify the accuracy of it first.

BCS members can change their own personal information at any time by logging in to MyBCS and updating personal details on the “Manage my Membership” page.”

Computing at School members can change their own personal information at any time by logging in to <https://www.computingatschool.org.uk/> and updating personal details directly.

8.4 Right to Erasure / Right to Be Forgotten

You can ask us:

- erase your personal information if you think we no longer need to use of for the purpose we collected it from you;
- erase your personal information if you have either withheld your consent to use using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, where we have used it unlawfully or where we are subject to a legal obligation to erase your personal information

We may not always be able to comply with your request, for example, if we need to keep using your personal information in order to comply with our legal obligations or where we need to use it to establish, exercise or defend legal claims.

8.5 Right to Restrict Processing / Withdrawing Consent

Where we have asked for your consent to use your personal information, you will always have the right to withdraw your consent. We will still hold your details on our databases but will not contact you.

8.6 The Right to Object

You can object to the use of your personal information for direct marketing purposes. We explain in the marketing section of this privacy notice more about our approach to direct marketing.

8.7 Requesting a transfer of personal information / Data Portability

You can ask us to

- provide your personal information to you in a structured, commonly used, and machine-readable format,
- or you can ask to have it transferred directly to another data controller (i.e. another organisation).

You can only do this where we use your personal information in order to perform a contract with you, or where we asked for your consent to use your personal information. This right does not apply to any personal information which we hold, or process based on our legitimate interest or which is not held in digital form.

9. Third Party Requests

We accept third party requests from individuals such as friends, relatives, solicitors or from persons who have power of attorney where:

- a) we have a letter from the data subject stating that they want a named person to make these changes on their behalf;
- b) we are given evidence of power of attorney
- c) the data subject and third party call together (either by being in the same room at the same time) or by a three-way call with BCS;
- d) the data subject calls BCS and is given the ZenDesk ticket number which they then provide to the third party who will then follow up with a call to BCS.

If you fail to provide personal data

Where we need to collect 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 goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

10. Contact Us

If you would like to contact us about the use of your personal data, or exercising your personal rights then please contact us at:

Email: dataprivacy@bcs.uk for any requests to stop processing your data

Email: bcs.legalteam@bcs.uk for any Subject Access Requests

Phone: + 44 (0) 1793 417 417

Lines are open Monday to Friday, 08:30 to 17:15 BST (UK Time)

Live Chat: This service is available Monday to Friday, 09:30 to 16:30 BST (UK Time).

11. Your Right to Complain

If you believe that your data protection rights have been breached and we have been unable to resolve your concern, you have the right to report your concern to your local data protection supervisory authority. In the UK this is the Information Commissioner's Office (ICO) and you can raise your concerns by going to <https://ico.org.uk/concerns>.

We do ask that you please attempt to resolve any issue with us before contacting the ICO.

12. Review and Monitoring

We will review this privacy notice on an annual basis in line with departmental quality standards and regulatory criteria.