

PRIVACY POLICY AND PROCEDURE

Updated: July 2026

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1. PURPOSE OF POLICY

At In2scienceUK, we are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to deliver our programmes, support participants and alumni, work with schools, universities, hosts, funders and supporters, and evaluate the impact of our work. This Privacy Policy explains how In2scienceUK collects, uses, stores and protects personal information in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), and other applicable laws.



If you have any queries about this policy, please contact the Data Protection Officer (DPO) at In2scienceUK, James Cook, Head of Operations, at: dataprotection@in2scienceuk.org

2. WHO WE ARE

In2scienceUK is a non-profit organisation which aims to support young people from low socioeconomic backgrounds to progress to careers in science, technology, engineering and maths (STEM). We are funded by host partnerships, trusts, foundations, individuals, the government and industry donors and supporters.

In2scienceUK is a registered charity in England, Wales and Scotland (1164821 & SC053912) and a registered company (07706662).

3. WHO THIS POLICY APPLIES TO

For the purpose of data protection law, In2scienceUK is the data controller for the personal information described in this policy. This means we decide why and how personal information is used. In some cases, another organisation may also act as a controller, or may process information on our behalf as a processor.

This policy applies to personal information relating to individuals, for example:

- Successful and unsuccessful programme applicants
- Participants and alumni
- Parents, guardians and emergency contacts
- Schools, colleges, universities, placement hosts, mentors and partner organisations
- Volunteers and event attendees
- Funders, donors, supporters and prospective supporters
- Job applicants, employees and trustees
- Suppliers, professional advisors, website users

When we process information about children and young people, we take particular care to ensure it is used appropriately, explain our approach clearly and ensure information is only shared where there is a legitimate reason to do so.

4. INFORMATION COLLECTION

We look after your personal data by keeping it up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting it from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect it.

4.1. Information you give us

We collect personal information when you apply for or participate in one of our programmes, make enquiries via email or online forms, attend events, volunteer, work with us as a partner,

make a donation, subscribe to updates, complete a survey, provide an impact story, or otherwise communicate with us.

The information we collect may include:

- Name, email address, postal address, telephone number and other contact details
- Date of birth, age, school year, education information, qualifications, predicted or achieved grades, subject interests, career interests and programme preferences
- School, college, university, employer or organisation details
- Application answers, eligibility information, attendance records, engagement records, survey responses, feedback and evaluation information
- Parent, guardian and emergency contact details where relevant
- Bank details, donation records, Gift Aid information, reimbursement details or payment records where applicable
- Photos, videos, quotes, testimonials and impact story information where you provide or consent to this
- Recruitment, employment, trustee or volunteering information where relevant.

4.2. Information about your interactions with us

When you visit our website, we may collect information about how you interact with our content and pages. When we send you an email, we may store a record of this and, for newsletters and similar communications, we may keep a record of whether you have opened the email and which links you have clicked on, where our systems provide this information, and it is lawful to use it.

We may also keep records of calls, meetings, forms, consents, preferences, opt-outs, support provided, safeguarding or welfare actions, and other interactions that are necessary to manage our relationship with you.

4.3. Sensitive personal data

Data protection law recognises that certain categories of personal information need extra protection. This is called special category data and may include information about health, disability, race, ethnicity, religious or philosophical beliefs, sexual orientation, biometric data used for identification, and political opinions.

We only collect special category data where there is a clear and lawful reason to do so. For example, we may collect health, disability, access need and ethnicity information about participants so that we can assess eligibility, make reasonable adjustments, monitor equality of opportunity, support safeguarding and welfare, and evaluate the reach and impact of our programmes.

When we process special category data, we identify a lawful basis under Article 6 UK GDPR

We may process criminal offence information only where this is necessary and lawful, for example, in relation to recruitment, trustee appointments, volunteering, safeguarding, or background checks.

4.4 Information from third parties

We may receive personal information about you from third parties where this is necessary and lawful. This may include information from schools, colleges, universities, placement hosts, referees, parents or guardians, funders, evaluation partners, alumni tracking partners, regulators, professional advisers or publicly available sources.

5. PURPOSE AND LAWFUL BASIS

We must have a lawful basis for every use of personal information. The lawful basis depends on the purpose of processing and may include contract, legitimate interests, consent, legal obligation, vital interests, or another lawful basis permitted by law.

Where we rely on legitimate interests, we balance our interests against the rights, freedoms and expectations of the individual. Where we rely on consent, consent can be withdrawn at any time, although withdrawal will not affect processing already carried out before consent was withdrawn.

6. MARKETING COMMUNICATIONS

We aim to communicate with you about our work in ways that are relevant, timely and respectful. This may include updates about our programmes, events, alumni opportunities, fundraising, campaigns, research, impact, volunteering and ways to support our mission.

We distinguish between essential service or programme communications and marketing communications:

1. Essential service or programme communications

Messages we need to send to manage an application, placement, event, volunteering activity, donation, safeguarding matter, survey or other relationship with us. These are not treated as marketing messages.

2. Marketing communications

These include newsletters, fundraising requests, supporter updates, campaign messages, promotional event invitations and other communications designed to promote or support our charitable work.

For electronic marketing, such as email, text message or similar messages, we will only contact you where we have your consent or where we are permitted to do so under PECR, including the charitable purpose soft opt-in where the legal requirements are met. We will always provide a clear way to opt out of marketing communications.

If you opt out of marketing, we will keep a record so that we can respect your preference. Opting out of marketing does not prevent us from contacting you about essential service, programme, legal or safeguarding matters where we need to do so.

7. PHOTOS, VIDEOS, IMPACT STORIES AND YOUR LIKENESS

For both still and moving images, we will explain when photography or filming is taking place and will respect the preferences you give us.

We will always ask for consent to use identifiable photos, videos or impact stories in In2scienceUK materials, including reports, newsletters, presentations, website content, social media, promotional materials and impact reporting.

Where relevant, we will also ask for consent for photos, videos or impact stories content to be shared with partners, funders, host institutions or other relevant third parties for specific purposes linked to our work, such as internal reporting, evaluation, impact reports or bespoke data requests. These third parties may also share those materials externally but only in a way that doesn't alter the content that we have provided and only to promote In2scienceUK's work.

If a partner, funder, host organisation or other third party wants to use identifiable photos, videos or impact stories content for a purpose that is not already covered by the consent you have given, we will seek your additional consent for that specific use each time they want to use it. Consent for one use will not be treated as blanket permission for future third-party requests.

You can withdraw your consent at any time by contacting us. Where material has already been published, printed or shared, we will take reasonable steps to stop future use and remove or replace it where practicable, but it may not always be possible to remove material that has already been distributed externally.

We keep records of consent preferences, withdrawals and objections so that we can comply with them.

8. OTHER PROCESSING ACTIVITIES

In addition to programme delivery and communications, we may process personal information in the following ways where this is within our legitimate organisational interests or otherwise lawful:

- analysing data we hold to make communications and support more relevant and effective;
- analysing data to improve the accessibility, reach and impact of our programmes;
- identifying and preventing fraud, misuse of our systems, security incidents or safeguarding risks;
- improving our website, systems, policies, training, governance and operational processes;
- managing recruitment, volunteering, employment, trustee and governance processes;
- using approved digital systems and administrative tools to help us organise information, produce reports and manage records.



We do not use solely automated decision-making that has legal or similarly significant effects on individuals unless we have told you and put appropriate safeguards in place.

We maintain a Record of Processing Activities (RoPA) and conduct Data Protection Impact Assessments (DPIAs) where needed.

9. THIRD PARTIES AND DATA SHARING

We may share personal information with third parties where this is necessary, lawful and proportionate. We only share the information needed for the relevant purpose, and we apply appropriate safeguards.

9.1 Programme partners

Participant data may be shared with schools, colleges, universities, placement hosts, mentors, volunteers and partner organisations where this is needed to facilitate applications, placements, events, support, safeguarding, reasonable adjustments and programme delivery.

9.2 HEAT, UCAS, universities and evaluation partners

Applicant, participant and alumni data may be shared with universities, [Higher Education Access Tracker - HEAT](#), Universities and Colleges Admissions Service (UCAS) or other evaluation and tracking partners to monitor the impact of our programmes and understand longer-term progression. We will only share data that is necessary, and we will do so via secure platforms. In2scienceUK does not, and will not, sell personal data to third-party organisations.

The HEAT Service is a research-facilitating service that processes personal data and tracks individuals for the purpose of monitoring and evaluating equality of opportunity for access and success in higher education. On an annual basis, HEAT submits complete records for students who are expected to be ready to enter higher education to the Higher Education Statistics Agency (HESA), the UK's digital agency for higher education and longitudinal tracking. HEAT will keep your data for 15 years after the programme. The HEAT Service does not link data to or use data for any decision-making process that directly affects individuals.

In2scienceUK uses the HEAT Service to longitudinally track the progression and monitor participation in widening access activities and projects of successful and eligible, unsuccessful programme applicants.

HESA and HEAT may share your data as detailed in their own privacy notices, which are accessible at the links provided:

<https://heat.ac.uk/privacy-notice/>

<https://www.hesa.ac.uk/about/regulation/data-protection/notices#linkg>

9.3 Funders and reporting partners

We may share anonymised, aggregated or statistical information with funders and supporters to demonstrate the reach and impact of our work. Where identifiable personal information is needed for a specific report, impact stories, image use, event or request, we will ensure there is a lawful basis and appropriate transparency, and we will seek consent where required.

9.4 Service providers and processors

We use service providers to help run our charity, programmes and systems. These may include providers of IT, cloud storage, CRM, email, survey, finance, payment, payroll, HR, safeguarding, recruitment, event, website, analytics, communications and professional services. Where they act as processors, they must only process personal information in accordance with our instructions and must apply appropriate security measures.

9.5 Legal, regulatory and public bodies

Data of any individual may be shared with law enforcement agencies, regulators, courts, auditors, professional advisors, insurers or other public authorities where we are required to do so, where we are authorised to do so by law, or where sharing is necessary to establish, exercise or defend legal claims or protect individuals from harm.

10. COOKIES AND WEBSITE ANALYTICS

Cookies are small text files that are placed onto your device from websites that you visit. They are widely used to allow a website to function, improve services and provide website operators with information on how the site is being used.

We use necessary cookies to make our website work and keep it secure. Where we use non-essential cookies, such as analytics, marketing or embedded content cookies, we will explain what they do and seek consent when required before setting them.

Our website will provide a cookie preference tool where required. You can also control cookies through your browser settings. If you block some cookies, part of our website may not work as intended.

11. YOUR PERSONAL INFORMATION AND RIGHTS

11.1. Consent and withdrawal

Where we rely on consent, you can withdraw your consent at any time by contacting us. Withdrawal of consent will not affect processing that has already taken place before consent was withdrawn. In some cases, we may still need to keep limited information to record your preference, comply with legal obligations or manage safeguarding, financial, contractual or regulatory requirements

11.2. Subject Access Requests

You have the right to access personal information we hold about you. If you contact In2scienceUK requesting your information, this is called a Subject Access Request.

Subject Access Requests should be made by email to dataprotection@in2scienceuk.org. The DPO will supply a standard request form, although you do not have to use this. We will verify the identity of anyone making a request before disclosing any personal information.

We will respond to Subject Access Requests within one month. As an internal standard, we aim to provide relevant information within 14 days where this is practical.

11.3. Other rights

Depending on the circumstances and legal basis for processing, you may also have the right to:

- ask us to correct inaccurate or incomplete personal information
- ask us to delete personal information where there is no longer a lawful reason for us to keep it
- ask us to restrict how we use your personal information
- object to processing based on legitimate interest or direct marketing
- withdraw consent where processing is based on consent
- ask for human review where solely automated decision making applies

These rights are not absolute and may not apply in every situation. For example, we may need to keep some information to meet legal obligations, safeguard individuals, manage complaints, defend legal claims, maintain suppression lists, or complete financial and audit records.

12. RETENTION

We keep personal data only for as long as it is needed for the purposes for which it was collected, unless we are required or permitted to keep it for longer.

We maintain a retention schedule which sets out how long different types of records are kept. At the end of the relevant retention period, personal data will be securely deleted or anonymised where appropriate. Where possible, we will anonymise or aggregate data so that it can continue to be used for evaluation, research, impact reporting and organisational learning without identifying individuals.

Any objections, withdrawals of consent, opt-outs or restrictions you make may be stored against your record so that we can comply with your request.

DATA TYPE	RETENTION PERIOD	KEY INFORMATION
Student Applicant and Participant Records	15 Years after the relevant programme finished	Supports long term programme evaluation, progression tracking, impact reporting
Alumni Name and Email	Continuous. Unless withdrawn during period of 15 years after programme participation	Where possible we minimise data by anonymising personal information. We will keep a record so that we can respect communication preference.
Hosts, Mentors and other Volunteers	7 years after relevant programme finished	After this point, records will be deleted or anonymised unless longer retention is needed for safeguarding, legal, audit, insurance or governance reasons.
Funders and Donors	7 years from last donation	Required for legal and accountancy requirements. Funders can withdraw consent for marketing
Photos and Videos	7 years after the end of the relevant programme or deleted immediately if consent is withdrawn.	Within practical limits where material has already been published, printed or distributed. We may retain a record of consent, withdrawal or restrictions so that we can manage future use appropriately.
Health, Welfare and Adjustments	1 year after end of the relevant programme year	This information will be anonymised unless we need to retain it for safeguarding, legal, insurance, complaint or risk-management reasons. This applies to participants, hosts and others where adjustment information is collected.
Participant Bank Details	1 year after end of the relevant programme	Limited financial records may be retained for longer where required for accounting, tax, audit, fraud prevention or legal purposes.
Staff Employee Records	7 years after employment ends	Required for legal, tax and employment claims.



14. CONTACT DETAILS

Please get in touch if you have any questions about this Privacy Policy, if you would like to exercise your rights, if you would like to object to processing based on legitimate interests, or if you would like to update your consent or communication preferences.

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