

## CAREERS WALES

### CUSTOMER PRIVACY NOTICE

#### Introduction

Welcome to CAREER CHOICES DEWIS GYRFA LTD's ('**Careers Wales**') privacy notice.

Careers Wales respects your privacy and is committed to protecting your personal data. This privacy notice will tell you:

- ✓ how we look after your personal data when you visit our websites [www.careerswales.com](http://www.careerswales.com), [careerswales.gov.wales](http://careerswales.gov.wales), and [workingwales.gov.wales](http://workingwales.gov.wales) (regardless of where in the world you visit it from); and
- ✓ how we look after your personal data generally (so looking at your personal data and how it is used in ways that do not involve our websites); and
- ✓ about your privacy rights and how the law protects you.

To make this privacy notice as easy to understand as possible, we have set out the information in sections – please click on the heading you are interested in and it will bring up the information you would like to know. If you are not sure what we mean by particular words or phrases, you can use the “*Glossary*” below which will help you understand the meaning of some of the terms used in this privacy notice.

Please read this privacy notice together with any other privacy notice we may give you on specific occasions when we are collecting or processing personal data about you. Reading our privacy notices will help you understand how and why we are using your data.

**Important:** we keep this privacy notice under review. Please regularly check back to see the latest version.

## 1 IMPORTANT INFORMATION (INCLUDING HOW TO CONTACT US)

### Purpose of this privacy notice

This privacy notice aims to give you information on how Careers Wales collects and processes your personal data through your use of our websites [www.careerwales.com](http://www.careerwales.com), [careerswales.gov.wales](http://careerswales.gov.wales), and [workingwales.gov.wales](http://workingwales.gov.wales) and your use of our services generally, including any data you may provide when you:

- ✓ Ask about our services
- ✓ Sign up to our services
- ✓ Use our services
- ✓ Chat with one of our Careers Advisers
- ✓ Sign up to our newsletter
- ✓ Take part in a competition
- ✓ Take part in a quiz
- ✓ Provide us with feedback
- ✓ Visit our premises
- ✓ Attend a Careers Wales event (such as a careers fayre etc)

### Controller

Careers Wales is the controller and is responsible for your personal data. In this privacy notice, wherever the words "**we**", "**us**" or "**our**" are used they refer to Careers Wales.

We take our duties to look after your personal data seriously. To help us look after your personal data, we have appointed a data privacy team (including a Data Protection Officer) to oversee your questions relating to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (we explain your legal rights in section 11 below), please contact our data privacy team using the contact details set out below:

## Contact details

**Careers Wales Full name:** CAREER CHOICES DEWIS GYRFA LTD  
**contact details:** (company registration number 07442837)

**Registered Office address:** 53 Charles Street, Cardiff, Wales, CF10  
2GD

**Data Privacy Team Email:** personal.data@careerswales.com  
(including Data Protection Officer)

**contact details:**

**Postal address:** 53 Charles Street, Cardiff, Wales, CF10  
2GD

**Telephone number:** 0800 028 4844

We want to let you know that if you are unhappy about something relating to your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**). The ICO is a government body that supervises data protection issues in the UK. You can find out more information about the ICO by visiting its websites ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact our data privacy team (using the contact details above), and tell us why you are unhappy before contacting the ICO.

## Your duty to inform us of changes to your personal data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes while we are working with you. An example of when your personal data may change may be when you move house, when you move school / college or when you change your contact details such as your email address or mobile phone number.

### Third-party links

When you use our websites [www.careerswales.com](http://www.careerswales.com), careerswales.gov.wales, and workingwales.gov.wales it may include links to other websites that we do not own or control (**third party websites**). Clicking on those links may allow those third party websites to collect or share data about you. When you leave our websites, we encourage you to read the privacy notice of every website you visit. This will help you understand how those third-parties use your personal data.

## 2 WHAT DATA DO WE COLLECT ABOUT YOU?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to be able to collect, store and use this type of personal information for the services we provide.

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

- ✓ **Identity Data** includes first name, last name, title, date of birth, gender, national insurance number, email address and any username used by you on our websites / to access our other digital services.
- ✓ **Phone Call Data** means all data that is recorded by our telephone systems (we may record telephone calls).
- ✓ **Security Data** includes information captured about you by our CCTV cameras that are installed at our offices and any information that you write into our visitor book when attending our offices. Please note that we may not always be the operator of CCTV at premises that we occupy (for example we sometimes share occupation with other organisations). Where this is the case we are not the data controller for this CCTV system.
- ✓ **Contact Data** includes home address, temporary contact address, email address and telephone numbers.
- ✓ **Education and Career Data** includes details about your status (for example whether you are at school, college or in employment or looking for employment and whether you are at risk of becoming NEET (not in employment, education or training)), details of the school or college that you attend, details of any employer you may have, details of any qualifications that you may have or that you are working towards, any preferences that

you may have about your education or future career, the Local Authority that is responsible for you, details of any special educational needs you may have, details of any disability that you may have, details of whether you are entitled to free school meals, details of the language you prefer to speak and write in, details on school attendance records, your Unique Learner Number and your Unique Pupil Number.

- ✓ **Technical Data** includes your internet address (IP address), your login data and details of the computers and mobile phones you use to access our websites.
- ✓ **Profile Data** includes your username and password used on our websites, your username and password used to access our other digital services, your interests, your preferences (including preferences about your education, future career and the language you prefer to speak and write in), feedback and survey responses.
- ✓ **Usage Data** includes information about how you use our websites and our services, including information about any Careers Wales events (meaning events that we organise either alone or with other organisations) that you attend.
- ✓ **Marketing and Communications Data** includes your preferences in receiving information and / or marketing from us and our third parties and how you prefer to receive that information and / or marketing.
- ✓ **Funding Data** includes details of any other funding or assistance that you may have received such as any work placement schemes that you have participated in.
- ✓ **Special Category Data** includes details of your race or ethnicity, details about any religion you may have, information about any special educational needs that you may have, information about any disability you may have, information about any criminal convictions or offences you may have. We have included references to some of this special category personal data in the above groups of information, but we have set them out separately here so you can understand what they are.

As we are a public body we are required to report on how we are meeting our equality and diversity obligations. This means that we may combine your personal data with the personal data of other people to produce “statistics”. This combined data is not considered to be personal data in law as it does not directly or indirectly identify you. We share the statistics / combined data that we create with other organisations.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract (such as a contract with an organisation that provides funding for you) or to deliver our services and you fail to provide that data when requested, we may not be able to provide you with help and assistance (for example, we may not be able to provide you with careers guidance). Should this situation happen, we will tell you.

### 3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from you and about you. To help make it easier for you to understand what data we collect and how we collect it, we have set out some examples in the table below:

Method of collecting data:	Examples of how we collect data this way:	What data do we collect this way:
<p><b>Direct interactions:</b></p> <p>When you:</p> <ul style="list-style-type: none"> <li>✓ fill in forms,</li> <li>✓ contact us by post,</li> <li>✓ contact us by phone (please note we record calls),</li> <li>✓ contact us by email,</li> <li>✓ contact us by webchat, or</li> <li>✓ have contact with us in person,</li> </ul> <p>we collect personal data about you.</p>	<p>You provide us with personal data when you:</p> <ul style="list-style-type: none"> <li>➤ ask about our services;</li> <li>➤ ask Careers Wales to provide you with help and support;</li> <li>➤ meet with your Careers Wales Careers Adviser / use our services generally;</li> <li>➤ create an account on our websites or other online service that we offer;</li> <li>➤ interact with any of our online services;</li> <li>➤ subscribe to our publications;</li> <li>➤ request marketing or information to be sent to you;</li> <li>➤ complete a quiz (such as the online Job Matching Quiz or online Career Checker quiz);</li> <li>➤ enter a competition, promotion or survey;</li> <li>➤ give us some feedback;</li> <li>➤ attend our offices; or</li> <li>➤ attend an event organised by Us.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Identity Data</li> <li>➤ Phone Call Data</li> <li>➤ Security Data</li> <li>➤ Contact Data</li> <li>➤ Education and Career Data</li> <li>➤ Technical Data</li> <li>➤ Profile Data</li> <li>➤ Usage Data</li> <li>➤ Marketing and Communications Data</li> <li>➤ Funding Data</li> <li>➤ Special Category Data</li> </ul>

Method of collecting data:	Examples of how we collect data this way:	What data do we collect this way:
<p><b>Use of our websites:</b></p> <p>As you use our websites <a href="http://www.careerswales.com">www.careerswales.com</a>, <a href="http://careerswales.gov.wales">careerswales.gov.wales</a>, and <a href="http://workingwales.gov.wales">workingwales.gov.wales</a> we may automatically collect data about your computer / mobile phone equipment and how you use and view our websites.</p>	<p>We collect this personal data this way by using:</p> <ul style="list-style-type: none"> <li>➤ Cookies;</li> <li>➤ server logs; and</li> <li>➤ other similar technologies.</li> </ul> <p>Please see our <a href="#">cookie policy</a> for further details.</p>	<ul style="list-style-type: none"> <li>➤ Technical Data</li> <li>➤ Profile Data</li> <li>➤ Usage Data</li> </ul>
<p><b>Use of our guest wi-fi:</b></p>	<p>At some of our offices we have free Wi-Fi available on site for the use of visitors. You will be given the address and password.</p>	<ul style="list-style-type: none"> <li>➤ Technical Data (plus traffic information in the form of sites visited, duration and date sent/received)</li> </ul>

Method of collecting data:	Examples of how we collect data this way:	What data do we collect this way:
<p><b>Third parties or publicly available sources:</b></p> <p>We may receive personal data about you from various third parties and public sources.</p>	<p>We may collect <b>Technical Data</b> and/or <b>Usage Data</b> from the following parties:</p> <ul style="list-style-type: none"> <li>a) analytics providers such as Google based inside or outside the EU; and</li> <li>b) advertising networks.</li> </ul> <p>We collect <b>Identity Data, Contact Data, Education and Career Data, Funding Data</b> and <b>Special Category Data</b> from the following third parties:</p> <ul style="list-style-type: none"> <li>a) Welsh Government and other public bodies who are interested in careers, education, training and / or employment services;</li> <li>b) Local authorities;</li> <li>c) Schools and colleges;</li> <li>d) Training providers;</li> <li>e) Employers;</li> <li>f) Businesses that provide you with work based learning opportunities;</li> <li>g) Prisons or other detention centres (where applicable);</li> <li>h) Other organisations that you may deal with who need to share data with us so that we can provide you with appropriate education, training and careers advice and guidance.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Technical Data</li> <li>➤ Usage Data</li> <li>➤ Identity Data</li> <li>➤ Contact Data</li> <li>➤ Education and Career Data</li> <li>➤ Funding Data</li> <li>➤ Special Category Data</li> </ul>



#### **4 HOW DO WE GENERALLY USE YOUR PERSONAL DATA?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ✓ Where we need to provide careers, education and/or training information, advice and/or guidance to you.
- ✓ Where it is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority of Careers Wales.
- ✓ Where it is necessary for our legitimate interests (or those of a third party) and your personal rights do not override those interests.
- ✓ Where we need to comply with a legal or regulatory obligation.

We will only use your Special Category Data when the law allows us to. Most commonly, we will use your Special Category personal data in the following circumstances:

- ✓ In limited circumstances, with your explicit written consent.
- ✓ Where it is needed in the substantial public interest, such as to support you in making decisions about your education and career, to help prevent you from becoming NEET (not in education, employment or training), for equal opportunities monitoring and to address inequality.
- ✓ Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

You can find out more about the types of lawful basis that we will rely on to process your personal data by reading the Glossary section below.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing being sent to you by email or text message at any time by contacting our data privacy team or clicking "unsubscribe" on any marketing emails or texts that you may receive from us.

We have set out below, in a table format, a description of the main ways we plan to use your personal data and the legal reasons why we use your personal data in this way. You should also read section 5 (Do we carry out profiling?) and section 6 (How do we use your personal data for marketing purposes & how do we deliver our services?) below.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our data privacy team if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
<p>To register you as a new customer of Careers Wales.</p>	<p>(a) Identity Data            (b) Contact Data            (c) Education and Career Data            (d) Profile Data            (e) Marketing and Communications Data            (f) Funding Data            (g) Special Category Data</p>	<p>(a) Necessary to comply with a legal obligation            (b) To carry out a task in the public interest and / or to carry out our official functions            (c) To carry out a task in the substantial public interest (where Special Category Data is concerned)</p>
<p>To provide you with:</p> <ul style="list-style-type: none"> <li>✓ careers guidance / support</li> <li>✓ educational guidance / support</li> <li>✓ support to help prevent you from becoming unemployed or falling out of education / training</li> </ul>	<p>(a) Identity Data            (b) Contact Data            (c) Education and Career Data            (d) Profile Data            (e) Usage Data            (f) Marketing and Communications Data            (g) Funding Data            (h) Special Category Data</p>	<p>(a) Necessary to comply with a legal obligation            (b) To carry out a task in the public interest and / or to carry out our official functions            (c) To carry out a task in the substantial public interest (where Special Category Data is concerned).</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To inform you of careers events that are taking place / training opportunities that may be available to you</p>	<p>(a) Identity Data            (b) Contact Data            (c) Education and Career Data            (d) Profile Data            (e) Usage Data            (f) Marketing and Communications Data            (g) Special Category Data</p>	<p>(a) To carry out a task in the public interest and / or to carry out our official functions            (b) To carry out a task in the substantial public interest (where Special Category Data is concerned)</p>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>✓ Telling you about changes to our terms or privacy policy</li> <li>✓ Asking you to leave a review or take a survey</li> <li>✓ Inviting you to take a quiz</li> </ul>	<p>(a) Identity Data            (b) Contact Data            (c) Education and Career Data            (d) Profile Data            (e) Usage Data            (f) Marketing and Communications Data            (g) Special Category Data</p>	<p>(a) Necessary to comply with a legal obligation            (b) To carry out a task in the public interest and / or to carry out our official functions            (c) To carry out a task in the substantial public interest (where Special Category Data is concerned).            (d) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to take part in a prize draw, quiz, competition or complete a survey	<ul style="list-style-type: none"> <li>(a) Identity Data</li> <li>(b) Contact Data</li> <li>(c) Education and Career Data</li> <li>(d) Profile Data</li> <li>(e) Usage Data</li> <li>(f) Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) To carry out a task in the public interest and / or to carry out our official functions</li> <li>(c) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
To administer and protect our business and our websites (including making sure our IT systems work properly, knowing who has visited our offices, reporting to our funders, resolving any service delivery issues you may raise and permitting our business to be audited as necessary).	<ul style="list-style-type: none"> <li>(a) Identity Data</li> <li>(b) Phone Call Data</li> <li>(c) Security Data</li> <li>(d) Contact Data</li> <li>(e) Education and Career Data</li> <li>(f) Technical Data</li> <li>(g) Profile Data</li> <li>(h) Usage Data</li> <li>(i) Marketing and Communications Data</li> <li>(j) Funding Data</li> <li>(k) Special Category Data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary to comply with a legal obligation</li> <li>(a) To carry out a task in the public interest and / or to carry out our official functions</li> <li>(c) To carry out a task in the substantial public interest (where Special Category Data is concerned)</li> <li>(d) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, security of our premises and persons on those premises, for training and monitoring purposes, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> </ul>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver relevant website content and adverts to you.	(a) Identity Data (b) Contact Data (c) Technical Data (d) Profile Data (e) Usage Data (f) Marketing and Communications Data	(a) To carry out a task in the public interest and / or to carry out our official functions  (b) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our websites and the services we offer.	(a) Technical Data (b) Profile Data (c) Usage Data (d) Contact Data (e) Education and Career Data	(a) To carry out a task in the public interest and / or to carry out our official functions  (b) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Education and Career Data (d) Technical Data (e) Profile Data (f) Usage Data (g) Marketing & Communications Data (h) Funding Data (i) Special Category Data	(a) To carry out a task in the public interest and / or to carry out our official functions  (b) Necessary for our legitimate interests (to develop our products/services and grow our business)  (c) To carry out a task in the substantial public interest (where Special Category Data is concerned)
To report on equality and diversity matters and to meet our public sector equality duties	(a) Special Category Data (b) Information about gender and age	(a) Necessary to comply with a legal obligation  (b) To carry out a task in the substantial public interest

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To carry out research and write reports that are of public interest (we may combine your personal data with the personal data of other people to produce “statistics”. This combined data is not considered to be personal data in law as it does not directly or indirectly identify you)</p>	<p>(a) Identity Data            (b) Contact Data            (c) Education and Career Data            (d) Usage Data            (e) Special Category Data</p>	<p>(a) To carry out a task in the public interest and / or to carry out our official functions            (b) To carry out a task in the substantial public interest (where Special Category Data is concerned)</p>
<p>To provide you with access to our free guest WI-FI when on-site</p>	<p>Technical Data (plus traffic information in the form of sites visited, duration and date sent/received)</p>	<p>Necessary for our legitimate interests (to be able to provide you with access to free WI-FI)</p>

### 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. Please contact our data privacy team if you want further information about this.

If we need to use your personal data for an unrelated purpose, we will (wherever possible) notify you and we will explain the legal basis which allows us to do so.

**IMPORTANT:** Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law. An example of this may be where we have safeguarding concerns.



## **5 DO WE CARRY OUT PROFILING?**

In providing our services to you we sometimes use “profiling” (profiling means using automated technology to predict various outcomes). Examples of where we may use profiling are:

- Where you fill out the Career Check quiz – this quiz uses software which helps us determine the most appropriate way that we can work with you to meet your needs;
- Where you complete the Job Matching quiz – the quiz uses an algorithm to help identify the jobs which best match your answers to the questions;
- To improve our service delivery to you and / or to inform future policy decisions.

If you would like more information on how we use profiling, please contact our data privacy team.

## **6 HOW DO WE USE YOUR PERSONAL DATA FOR MARKETING PURPOSES & HOW DO WE DELIVER OUR SERVICES?**

We may use your Identity Data, Contact Data, Education and Career Data, Technical Data, Profile Data, Usage Data and Funding Data to send you marketing communications.

You will receive marketing communications from us if you have:

- ✓ attended a school or college in Wales; or
- ✓ requested information from us; or
- ✓ signed up to receive our services; or
- ✓ provided us with your details when you entered a competition, quiz or registered for a promotion; or
- ✓ attended an event that we organised (by ourselves or along with others)

and in each case, you have not opted out of receiving that marketing.

Where we want to send you marketing messages by email or text message we will ask for your “consent” to do so. You do not have to give us your consent and even if you do give consent, you can withdraw your consent to receiving marketing emails and texts at any time.

### How do I “opt out” of receiving marketing?

You can ask us to stop sending you marketing messages at any time by contacting our data privacy team using the contact details above at any time or by unsubscribing from any marketing emails or texts that you may receive.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any service that we may have provided to you (such as careers and education advice).

### How do we deliver our services? Important, please read!:

Many of our services are delivered electronically. If we send you an email or a text and the purpose of that email or text is “service delivery”, we do not need your consent to send it to you. If you would like to understand the difference between what we believe is “marketing” (where we need your consent to email or text you) and what we believe is “service delivery” (where consent is not needed to send you emails and texts) please get in touch with the Careers Wales data privacy team using the contact details set out above.

### Cookies

We use cookies on our websites. If you want further information please see our [cookie policy](#).

## 7 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal data with the following organisations for the purposes set out in section 4 above:

<i>Other data controllers who are involved in careers advice, education, training and employment or who have responsibility for the well-being of people in Wales:</i>	<ul style="list-style-type: none"><li>✓ Welsh Government and other public bodies involved in education, careers, training and employment services;</li><li>✓ Your Local Authority, school and / or college;</li><li>✓ The prison service (where applicable);</li><li>✓ Businesses that may take you on work experience placements;</li><li>✓ Your employer;</li><li>✓ Training Providers;</li><li>✓ Third sector organisations that you may deal with such as Cyfle Cymru, Gwent Association of Voluntary Organisations and The</li></ul>
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	Prince's Trust for example.
<i>Our data processors (meaning businesses that carry out work on our instructions):</i>	<ul style="list-style-type: none"> <li>✓ Service providers who provide IT services and / or system administration services;</li> <li>✓ Service providers who provide business administration services;</li> <li>✓ Service providers who provide business intelligence and data analysis services;</li> <li>✓ Service providers who provide other services to us.</li> </ul>
<i>Other organisations:</i>	<ul style="list-style-type: none"> <li>✓ Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services;</li> <li>✓ Our outsourced DPO;</li> <li>✓ HM Revenue &amp; Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances;</li> <li>✓ Funders of Careers Wales (ie European funding agencies) and their auditors;</li> <li>✓ Marketing and market research agencies;</li> <li>✓ Researchers, research agencies and academic institutions;</li> <li>✓ Other organisations that we may transfer our business to or merge with from time to time.</li> </ul>

We do not allow our third-party service providers (who are acting as our data processors) 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.

Sometimes, as part of providing you with advice, guidance and support, we may need to share your personal data with your parent or guardian. We will discuss this with you should this be the case.

## **8 INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA**

We store and therefore process your personal data in the United Kingdom and European Economic Area (EEA). Generally, we do not transfer your personal data outside the United Kingdom / EEA area. However, we may transfer your data outside the United Kingdom / EEA

area where this is allowed by applicable data protection legislation. You can find out more about this by contacting our data privacy team.

Rarely, where your parent or guardian is based outside the United Kingdom and they are involved in the education, training and careers advice, guidance and support process, we may need to transfer your personal data outside the United Kingdom. Where this is the case, we will discuss this with you.

## **9 HOW DO WE KEEP YOUR PERSONAL DATA SAFE?**

We have put in place appropriate security measures to prevent 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 of our employees 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 have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **10 HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

### **How long will you use my personal data for?**

We will only keep 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting our data privacy team using the contact details set out above.

In some circumstances you can ask us to delete your data: see the Glossary below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes or for reporting information to our funders in which case we may use this information indefinitely without further notice to you.

## **11 WHAT RIGHTS DO I HAVE IN RELATION TO MY PERSONAL DATA?**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You can read more about these rights in the Glossary section below:

- ✓ *Request access to your personal data.*
- ✓ *Request correction of your personal data.*
- ✓ *Request erasure of your personal data.*
- ✓ *Object to processing of your personal data.*
- ✓ *Request restriction of processing your personal data.*
- ✓ *Request transfer of your personal data.*
- ✓ *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact our data privacy team using the contact details that are set out above.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**12 GLOSSARY: WHAT DO WORDS / PHRASES USED IN THIS PRIVACY NOTICE MEAN?**

<p><b><u>Tell me more about the “lawful bases” of processing</u></b></p>		
	<p><b>Legitimate Interest:</b></p>	<p>means the interest of Careers Wales in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Legitimate interests <u>do not apply</u> where we are acting in our capacity as a public body. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our data privacy team.</p>
	<p><b>Performance of Contract:</b></p>	<p>means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.</p>
	<p><b>Comply with a legal or regulatory obligation:</b></p>	<p>means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that Careers Wales is subject to.</p>
	<p><b>Carry out a task in the public</b></p>	<p>means processing your personal data where it may be needed in the public interest and / or where we need to process it to exercise our official authority, such as to support you in making</p>

	<b>interest and / or to carry out our official functions:</b>	decisions about your education and career, to help address inequality and for equal opportunities monitoring.
<b><u>Tell me more about my “legal rights”</u></b>	<b>You have the right to:</b>	
	<b>(1)</b>	<b>Request access</b> to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
	<b>(2)</b>	<b>Request correction</b> of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
	<b>(3)</b>	<b>Request erasure</b> of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
	<b>(4)</b>	<b>Object to processing</b> of your personal data where we are relying on a legitimate interest (or those of a third party) / where we are relying on public task and there is something about your



		<p>particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.</p>
	<b>(5)</b>	<p><b>Request restriction of processing</b> of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</p>
	<b>(6)</b>	<p><b>Request the transfer</b> of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>
	<b>(7)</b>	<p><b>Withdraw consent</b> at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.</p>