

DLA PIPER GLOBAL SCHOLARSHIPS AND HEAD START PROGRAMME PRIVACY NOTICE

Last updated : July 2023

1. <u>Purpose of this notice</u>	7. <u>Where do we transfer your data to</u>
2. <u>Definitions and other useful information</u>	8. <u>Confidentiality and security of your personal data</u>
3. <u>Who are we and what do we do</u>	9. <u>How to access your personal data and your other rights</u>
4. <u>What personal data do we collect</u>	10. <u>Status of this Privacy Notice</u>
5. <u>How do we use your personal data and on what basis</u>	11. <u>Changes to the Privacy Notice</u>
6. <u>For how long will we retain your data</u>	

1 PURPOSE OF THIS NOTICE

DLA Piper is committed to protecting your privacy and the personal data that we handle in relation to DLA Piper Foundation's Global Scholarships and Head Start programmes (each a "**Programme**").

This Privacy Notice ("**Privacy Notice**") is intended to explain what personal data will be handled by us in relation to you, in what context, and on what basis, as a result of your application to and participation in the Programmes.

This Privacy Notice is also intended to help you understand what rights you have in relation to your personal data – for example how you can request that we delete, update, transfer and/or provide you with access to your personal data.

Please take a moment to read and understand it. Please also note that this Privacy Notice only applies to the use of your personal data obtained and processed by us.

NOTE: Children aged 16 or under – if you are aged 16 or under, we require your parent/guardian's permission before you provide us with any of your personal data.

2 DEFINITIONS AND OTHER USEFUL INFORMATION

Certain of the words or concepts used in this Privacy Notice have specific meanings, which are set out in data protection laws. A few of these words and concepts are explained below. However if you have any questions in relation to anything in this Privacy Notice that you do not understand, or would like more information, please let us know and we will be very happy to assist you (*see contact details below*).

WHAT IS "PERSONAL DATA"?

"*Personal data*" refers to any information which relates to a living individual. It includes not only facts about such individual, but also intentions and opinions expressed by them and about them. This can include information, which when put together with other information, can identify a person. For example, this can be your name, photograph, date of birth, CV information and contact details.

WHAT IS "PROCESS" OR "PROCESSING"?

"*Processing*" means, literally, handling or doing anything with the personal data. For example, it includes collecting, holding, editing, disclosing, transmitting and deleting the data.

WHAT IS A “DATA CONTROLLER”?

A “Data Controller” is a person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

WHAT IS A “DATA PROCESSOR”?

A “Data Processor” is a person, public authority, agency or other body which processes personal data on behalf of the Data Controller.

WHAT ARE “SENSITIVE” OR “SPECIAL CATEGORIES” OF DATA?

“*Special*” or “*sensitive*” personal data is a specific category of personal data that needs more protection because it is more sensitive. It is information that you might not want to be widely known because it is very personal to you. This can include information about your:

- health, genetic and/or biometric data
- religious or philosophical beliefs
- race and ethnicity
- physical or mental health
- sexual orientation
- trade union membership
- political opinions

3 WHO ARE WE AND WHAT DO WE DO

DLA Piper is a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. Details of the different DLA Piper entities that provide legal services or other services to clients can be found [here](#).

References to “DLA Piper”, the “Firm”, “our”, “we” or “us”, include DLA Piper UK LLP and the various DLA Piper entities operating in the UK, Europe, Asia-Pacific, Middle East and Africa.

In the context of the Programmes, the “Data Controller” of your personal data will be DLA Piper UK LLP.

HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an email to: privacyteam@dlapiper.com; or
- calling us on: +44 (0)8700 111 111

4 WHAT PERSONAL DATA DO WE COLLECT

4.1 BEFORE THE PROGRAMME: When you apply to join one of our Programmes, we will need to collect certain of your personal data in order to assess your eligibility and suitability to participate in a Programme. If you are accepted for a Programme, your personal data will then be used by us to administer the Programme, our services in relation to the Programme, and your participation in the Programme. The initial data that we collect about you will come from your application form, your CV, or from the Sutton Trust, and will include your:

- Name
- Date of Birth
- Address
- Phone Numbers
- Email Address
- Gender
- Ethnicity and race (where provided)
- Current qualifications and achievements
- University applications
- Previous and current work details
- Access or additional needs or requirements (where provided)

We will also ask you to provide us with certain information about your and your family's socio-economic status. This will be information that will help us understand:

- Whether you would be the first generation in your immediate family to attend university.
- Whether you have attended schools with a lower-than-average student progression to higher education, lower than average A level/Higher point scores or a higher-than-average proportion of students who qualify for Free School Meals/Pupil Premium/Education Maintenance Allowance/16-19 bursary.
- Whether you have, or have had, caring responsibilities for another person.
- Whether you have been in receipt of Free School Meals/Pupil Premium/Education Maintenance Allowance/16-19 bursary.
- Whether your parent(s)/guardian(s)/carer(s) qualify for means-tested benefits.
- Your household's main earner's occupation (e.g. 'technical / craft'; 'routine'; 'semi-routine manual'; 'service occupation'; or 'long-term unemployed').
- Whether you have been looked after by a local authority, or are in local authority care.
- Whether you came to the UK as a refugee or as an asylum seeker.

We may also receive data from (and share data with) third parties such as education professionals and similar organisations, such as the Social Mobility Business Partnership, the Bridge Group, your school or college.

4.2 DURING THE PROGRAMME: In addition to the information listed above, we will also handle the following information:

- Any assessments you may undertake
- Details of conversations you may have with our staff
- Action Plan
- CVs
- Your Programme targets
- Feedback from you and your tutor
- Any offer of education or training you may have when the Programme ends
- Your attendance record

5 HOW DO WE USE YOUR PERSONAL DATA AND ON WHAT BASIS

5.1 RECRUITMENT

We will use your personal data to assess your eligibility and suitability for a position on the Programmes for which you apply, whether such application has been received by us online, via email or by hard copy, or an in-person application.

5.2 EQUALITY OF OPPORTUNITY AND TREATMENT, DIVERSITY AND INCLUSION

We will use your personal data to monitor and review DLA Piper's equal opportunity and diversity and inclusion profile in accordance with applicable legislation in relation to (e.g.) gender, race, ethnic origin, age, religion, sexual orientation, disability, socio-economic status, or any other basis covered by applicable legislation. All employment related decisions are made entirely on merit.

What is our legal basis for using your personal data in this way?

Where we use your personal data in connection with the purposes identified in paragraphs 5.1 and 5.2 above it will be:

- in connection with us identifying and keeping under review the existence or absence of equality of opportunity or treatment, with a view to enable equality of opportunity or treatment to be promoted and maintained;
- in connection with us taking steps at your request prior to entering into a contract with you;
- with your consent; or
- based on our legitimate interest to use your personal data to ensure that we can make the best application decisions for DLA Piper and to assist us with the current and future management of the Programme.

We will not process any special category data except where we are able to do so under applicable legislation or with your explicit consent.

5.3 PERSONALISED SUPPORT

We may share your personal data with members of the DLA Piper Social Mobility team (Social Impact Manager, Programme Coordinator, Community Programmes Supervisor, Global Scholarships Manager), local Head Start coordinators, mentors and other HR team members in order to ensure that you receive personalised support during the Programme.

What is our legal basis for using your personal data in this way?

To perform our obligations in accordance with a contract that we have with you, or with your consent. Further, it is in our legitimate interest to use your personal data to ensure that we can manage the Programme and provide the very best Programme experience to you and our other Programme entrants.

5.4 FINANCE

We will use your personal data for reimbursements and payments. To facilitate this we will share details, such as your name, address, contact details and bank account information with our Finance team.

What is our legal basis for using your personal data in this way?

To perform our obligations in accordance with a contract that we have with you. Further, it is in our legitimate interest to use your personal data in connection with the Programmes to ensure accurate reimbursement or payments, or it is our legal obligation to use your personal data to comply with any legal obligations imposed upon us.

5.5 INTERNSHIPS and/or FUTURE APPLICATIONS

We may share your personal data with other members of the Firm in relation to available internships. We may also disclose your data to other members of the Firm where necessary for decision making on future applications for employment made by you. We would like to continue to follow your progression after the Programme and may contact you to find out if you are in education, employment or training.

What is our legal basis for using your personal data in this way?

Where we use your personal data in connection with internships or future applications, it will be in connection with us taking steps at your request prior to entering a contract with you, or it is in our legitimate interest to use personal data to ensure that we can make the best application decisions for DLA Piper. We will not process any special category data except where we are able to do so under applicable legislation or with your explicit consent.

5.6 MARKETING COMMUNICATIONS

We may carry out the following marketing activities using your personal data:

- Postal marketing
- Email marketing

What is our legal basis for using your personal data in this way?

It is in our legitimate interest to use your personal data to keep you informed about our programmes, training, recruitment or similar initiatives that might be of interest to you. We will only send you marketing communications where you have consented to receive such marketing communications, or where we have a lawful right to do so. You will however be able to opt out at any time and ask that we stop contacting you.

5.7 EXTERNAL DISCLOSURES OF PERSONAL DATA

Specific circumstances in which your personal data may be disclosed externally to other parties include:

- Disclosure to organisations that process data on our behalf such as our insurers, other benefit providers, our bank and organisations that host our IT systems and data. Data sharing of such nature would normally occur if you were to join either Programme.
- Disclosure to our travel management company in order to arrange travel for you (name, email address and telephone number). For international travel purposes only, your passport details will also be shared.
- Disclosure to external consultancy companies or to our Head Start partners, (I.G. Advisors, the Social Mobility Business Partnership, the Bridge Group) for the purpose of monitoring and evaluating the Programmes' impact, and to keep Programme participants informed in relation to activities or further work experience and/or employment opportunities.
- Disclosure where we are required to do so by law and/or in connection with criminal or regulatory investigations.

What is our legal basis for using your personal data in this way?

To perform our obligations in accordance with a contract that we have with you, or it is in our legitimate interest, or a third party's legitimate interest, to use the personal data to ensure that we and those third parties can manage the Programme and provide services in relation to the Programme in the best way possible. We may also need to process your personal data to comply with certain of our legal obligations.

6 FOR HOW LONG WILL WE RETAIN YOUR DATA

We will retain your data for the five-year (5-year) duration of the Programmes, and for six (6) years thereafter for monitoring and evaluation purposes, or for a longer period in accordance with our systems policies or as we are required or permitted to do so in accordance with our professional indemnity insurance obligations or applicable legislation.

7 WHERE DO WE TRANSFER YOUR DATA TO

In order to on-board you as part of the Programmes, we may need to transfer your personal data to locations outside the jurisdiction in which you provide it.

Your personal data may be disclosed to other DLA Piper entities located outside of the United Kingdom or the European Economic Area, in certain jurisdictions which do not offer a level of protection of privacy and personal data equivalent to the level of protection existing within the United Kingdom or the European Union.

However, all DLA Piper entities have signed a *data sharing agreement* (which also incorporates the EU standard contractual clauses) to ensure that we comply with our legal and regulatory obligations in relation to personal data, including having a lawful basis for transferring personal data and putting in place appropriate safeguards to ensure an adequate level of protection for the personal data that we transfer.

8 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the personal data that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss.

All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal data, are obliged to respect and protect the confidentiality and security of such data.

9 HOW TO ACCESS YOUR PERSONAL DATA AND YOUR OTHER RIGHTS

You have the following rights in relation to the personal data we hold about you:

- **Your right of access**
If you ask us, we'll confirm whether we're processing your personal data and, if necessary, we will provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Your right to rectification**
If the personal data we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
- **Your right to erasure**
You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we've shared your personal data with others, we'll let them know about the erasure request where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to restrict processing**
You can ask us to 'block' or suppress the processing of your personal data in certain circumstances, such as where you contest the accuracy of that personal data or you object to us. If you are entitled to restriction and if we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
- **Your right to data portability**
You have the right, in certain circumstances, to obtain the personal data you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer it to a third party of your choice.
- **Your right to object**
You can ask us to stop processing your personal data, and we will do so, if we are:
 - i. relying on our own or someone else's legitimate interests to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or
 - ii. processing your personal data for direct marketing purposes.
- **Your right to withdraw consent**
If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.
- **Your right to lodge a complaint with the supervisory authority**
If you have a concern about any aspect of our privacy practices, including the way we've handled your personal data, you can report it to the relevant supervisory authority, which in the UK is the Information Commissioner's Office – contactable via the link here: [Contact us | ICO](#).

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to certain legal reasons.

10 STATUS OF THIS PRIVACY NOTICE

This Privacy Notice does not form part of any contract of employment or any other agreement you might enter into with the Firm and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this Privacy Notice is intended to create an employment relationship between the Firm and a non-employee.

11 CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with applicable law or regulatory requirements. Where it is practicable, we will notify you of any significant changes. You may also contact us using the contact details provided above if you wish to see the then current version of this Privacy Notice.