



Privacy Notice

Issued on 23/04/2021

www.oxcomoc.com



STATEMENT

This statement tells you about the data processing practices of the Oxford Commission on Constitutions. We collect and retain only relevant personal data about you which is used exclusively for our research, conference or educational management, fundraising and promotional purposes. This policy applies to personal data we collect through our website and also to any other personal data we collect or receive through any other medium. We do not share your information with any other institutions or external third parties. We are very mindful of the sensitivity of your personal data and we have taken all reasonable steps to ensure that your information is: accurate and up-to-date, not excessive, properly protected and held in the strictest confidence. If you wish your details to be removed from our database, or to update any of your details (or for any other reason outlined in Section 6 below) please contact us using the OCC email address: info@oxcomoc.com

Oxford Commission on Constitutions understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.oxfordcyberacademy.com ("Our Site"), and who provides us with their personal data in whatever form and through whatever other medium. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

This Privacy Policy applies to

- (1) your use of Our Site,
- (2) all third party services that we work with and operate for the purposes of handling data;
- (3) any personal data that you supply to us through any other medium.



1. DEFINITIONS AND INTERPRETATION

In this Policy, the following terms shall have the following meanings:

- **Account**

means an account required to access and/or use certain areas and features of our Site;

- **Cookie**

means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

- **Cookie Law**

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

- **Personal Data**

means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and

- **Oxford Commission on Constitutions OCC/We/Us/Our**

means Oxford Commission on Constitutions, whose registered address is OCC c/o The Oxford Cyber Academy, 27 Maple Avenue, Kidlington, Oxford, OX5 1HN



2. INFORMATION ABOUT US

Our Site is owned and operated by Oxford Cyber Academy Limited

3. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies as previously specified (1) your use of Our Site, (2) all third party services that we work with and operate for the purposes of handling data; (3) any personal data that you supply to us through any other medium.

Our Site, and communications sent out by any of the third party services that we use for marketing purposes may contain links to other websites. Please note that we have no control over how your personal data is collected, stored, or used by other websites linked to from our website or other services and we advise you to check the privacy policies of any such websites before providing any personal data to them.

4. YOUR RIGHTS

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- a) The right of access to the personal data We hold about you;
- b) The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us);
- c) The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, but if you would like Us to delete it sooner, please contact Us);
- d) The right to restrict (i.e. prevent) the processing of your personal data;
- e) The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- f) The right to object to Us using your personal data for particular purposes; and
- g) Rights with respect to automated decision making and profiling.

- 4.2 The right to be informed about Our collection and use of personal data;
- 4.3 If you have any cause for complaint about Our use of your personal data, please contact Us and We will do our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office. <https://ico.org.uk/>
- 4.4 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau

5. WHAT DATA DO WE COLLECT?

5.1 on Our Site: Depending upon your use of Our Site, We may collect some or all of the following personal, and non-personal data on Our use of Cookies and similar technologies:

- a) Name
- b) Contact information such as
- c) IP address
- d) Web browser type and version
- e) Operating System

5.2 Through any other medium:

- a) Name
- b) Contact information such as postal addresses, email addresses and telephone numbers
- c) Employee information (bank account details, next of kin details, reference history).
- d) Supplier and Customer data (bank account details, address, contact information).



6. HOW DO WE USE YOUR DATA?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reasons for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
- a) Replying to emails from you
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, and/or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties (including YouTube) whose content appears on Our Site may use third party Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.
- 6.7 The accuracy and relevance of personal data shall be checked periodically, the period depending on the sensitivity of the data.
- 6.8 If it is still relevant for the record to be held, We will attempt to contact the owner of the data to validate its accuracy. If We cannot validate its accuracy in a reasonable time frame We will delete it.

7. HOW AND WHERE DO WE STORE YOUR DATA?

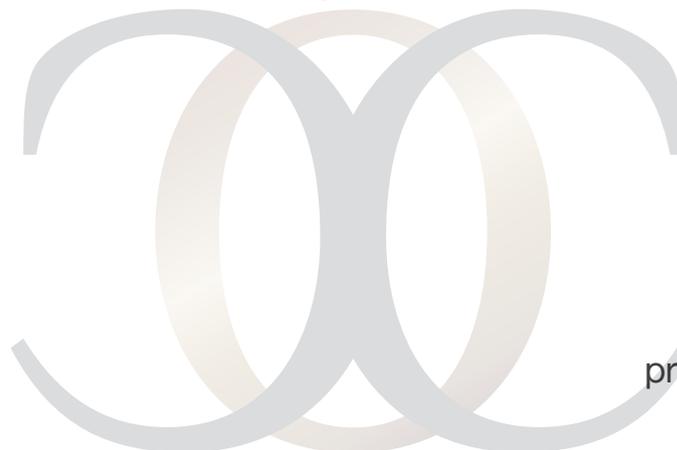
- 7.1 We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 our data will only be stored in the EEA.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site and from any other sources.

8. DO WE SHARE YOUR DATA??

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.
- 8.2 We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority. In these instances, our compliance with the law overrides your privacy rights.

9. WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.



10. HOW CAN YOU CONTROL YOUR DATA?

10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site or via other means, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

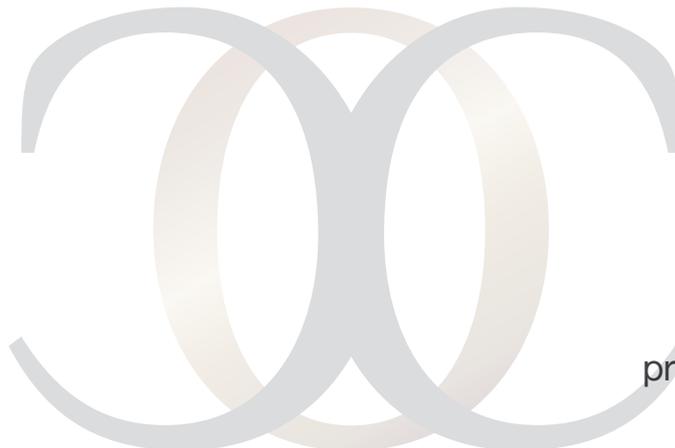
10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. YOUR RIGHT TO WITHHOLD INFORMATION

You may access certain areas of Our Site without providing any personal data at all, or without us collecting any data. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

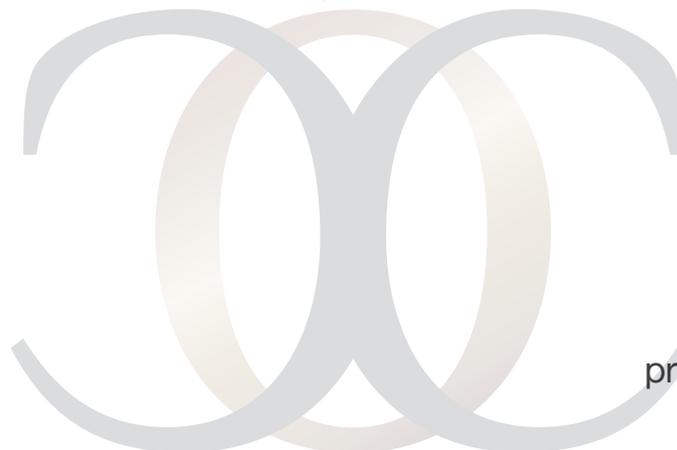
12. HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at info@oxcomoc.com



13. OUR USE OF COOKIES

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 13.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for For showing social feeds. For more details, please refer to section 6, above, and to section 10.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
- 13.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 13.4 Before certain Cookies are placed on your computer or device, you will be shown a notification requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 13.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 10.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed in our site Cookie Policy (pg4), but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.



13.6 The following first party Cookies may be placed on your computer or device:

Cookie

Description

gdpr_cookie_accept

A cookie to prevent the notification bar appearing once accepted.

a) and the following third party Cookies may be placed on your computer or device:

Cookie Description/Provider

IDE

YouTube Video Player

YouTube

PREF

YouTube Video Player

YouTube

VISITOR_INFO1_LIVE

YouTube Video Player

YouTube

YSC

YouTube Video Player

YouTube



- 13.7 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you. The analytics service(s) used by Our Site use(s) the following Cookies to gather the required information:

Cookie Description/Provider

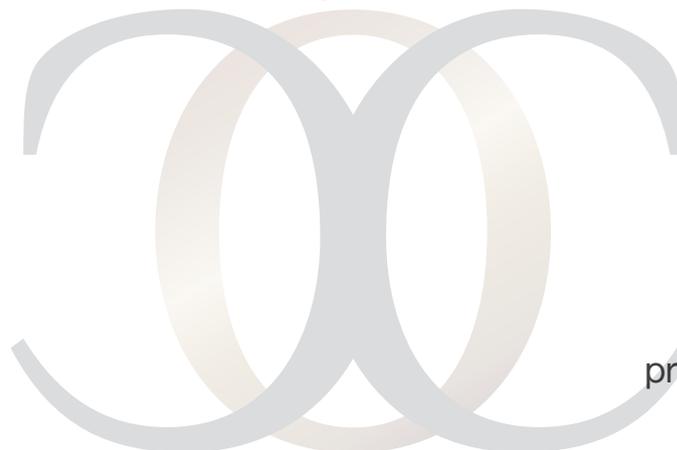
_ga

Google Analytics Tracking Cookie

_gid

Google Analytics Tracking Cookie

- 13.8 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.9 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.10 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.



14. CONTACTING US

If you have any questions about Our Site or this Privacy Policy, please contact Us by email, or by post. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

12. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Last updated 23/04/2021

