

Privacy Notice for Allen & Overy's Access to Education and Employment Community Programmes

Allen & Overy values your privacy and cares about the way in which your personal information is treated.

This privacy notice applies to the personal information, including sensitive personal information, you may provide or Allen & Overy may obtain in connection with our access to education and employment community programmes, including:

- the Smart Start Experience and scholarship programme;
- the Step Into Solicitor Apprenticeship programme;
- Restart, our programme to help people over the age of 50 return to work; and
- our relationships with our partner schools.

Personal information is information that identifies you or may be used to identify you. Sensitive personal information includes information concerning your ethnicity, your religion, your health and any disability requirements.

Allen & Overy refers to Allen & Overy LLP and other partnerships, undertakings and entities which are authorised to practise using the name 'Allen & Overy'. See 'Who the data controllers are' below for more information.

This policy describes:

- what personal information we collect and process about you and how we obtain it
- how and on what basis we use your personal information
- how long we keep your personal information
- who we share your personal information with and how we protect it
- which countries we transfer your personal information to
- your rights regarding your personal information and who the data controllers are in respect of it
- changes to our Privacy Policy and who to contact with questions or concerns

What personal information we collect about you

The personal information we collect and generate about you in connection with our access to education and employment community programmes includes:

- basic information, such as your name, contact information (postal address, email address and phone numbers), date of birth and gender;
- identification and background information provided by you or collected by us as part of our application processes, including your skills, qualifications, academic details, employment history and other experience, career aspirations, details of citizenship and right to remain and study, and a copy of your university application in the case of the Smart Start scholarship programme;
- socio-economic information collected by us as part of our application processes, including eligibility for free school meals, whether you are the first in your family to attend university and whether you have been a refugee or an asylum seeker;
- information you provide when you are visiting the offices of Allen & Overy or its business partners, including dietary and access requirements;

- technical information such as information from visiting our websites, using our IT systems, from communications we send to you electronically and in relation to your use of and access to our premises, such as electronic access records and CCTV footage;
- your ethnicity, which is sensitive personal information, but only should you choose to provide it;
- bank account information for the purposes of making payments to you or reimbursing any expenses;
- in the case of the Smart Start scholarship programme, financial information including details of other financial support;
- photographs or video recordings received directly from you or that are taken of you participating in workshops or activities. These may contain sensitive personal information, for instance if they indicate your religion or ethnicity;
- feedback from your school, our staff and third parties involved in delivering the programmes;
- contact details for people we need to contact in case of an emergency;
- in the case of the Smart Start Experience and the Step Into Solicitor Apprenticeship programme, contact details for your teacher; and
- any other information relating to you which you provide to us.

Before providing us with personal information about another individual, please make sure that you have their permission to share it with us for the relevant purpose.

How we may obtain your personal information

In relation to your application or participation in our access to education and employment community programmes, we collect or obtain your personal information:

- through completion of an application form and as part of our assessment and acceptance procedures;
- during interviews and assessment exercises;
- from third parties working with us on our access to education and employment community programmes, such as Causeway Education and MyKindaFuture. See 'Who we share your personal information with' for more information;
- in connection with your attendance at our offices, such as access and dietary requirements provided by you or CCTV footage or electronic access information;
- in the course of any work experience you undertake with us or as a result of participating in workshops, training, seminars or other activities;
- in surveys and feedback sessions with you to get your views on our programmes and how they have benefitted you;
- from Allen & Overy staff and business partners in relation to your participation in our programmes and any work experience you undertake; and
- when you contact or communicate with us, including by email and through websites or applications (including allenoverly.com).

How we may use your personal information

We will only process and use sensitive personal information about:

- your dietary and access requirements in order to cater for your needs when visiting our offices; and

- your ethnicity for internal diversity monitoring purposes.

We will process and use your personal information more generally in order to run, administer, promote and improve our access to education and employment community programmes and to help us consider any new programmes we might offer.

Where you choose to participate in them, we will use your personal information in relation to other programmes that develop employability skills, prepare individuals for the workplace and to provide work experience with Allen & Overy, our clients or business partners.

We may use photographs or video recordings of individuals participating in workshops or other activities and quotes in relation to their experiences:

- in materials and publications created by Allen & Overy for internal events or meetings;
- on Allen & Overy websites available to the general public;
- in Allen & Overy’s annual review or other external publications that are available to the general public;
- in local, national and international newspapers or news programmes; and
- in any similar promotional media or marketing materials.

How and on what basis we use your personal information

We have set out below the principal purposes for which we use your personal information and the legal basis (as set out in data protection law) that we rely on to do so.

Purpose	Legal Basis
To provide information requested by you and to communicate with you	For our legitimate business purposes (to provide information that you request and to communicate with you)
To process and assess your application and consider your suitability for our access to education and employment community programmes	<p>For our legitimate business purposes (to assess and consider your application) and to take steps prior to entering into a contract between you and us</p> <p>To comply with any legal obligations that apply to us in relation to this purpose, such as to establish eligibility to remain and study in the UK</p>
To organise and host workshops and exercises, provide training, host events that you attend and provide work experience, where relevant	<p>For our legitimate business purposes (for example, we will collect data to facilitate your visit to our premises and maintain the security of our systems and premises)</p> <p>We may also process personal information to ensure compliance with the firm's legal obligations to provide appropriate access to its premises and comply with health and safety requirements</p>

To promote and improve our access to education and employment community programmes	For our legitimate business purposes (the provision, improvement and promotion of our programmes)
For diversity and equality monitoring purposes	We may process diversity information for our legitimate interests (to monitor and evaluate the
Purpose	Legal Basis
	effectiveness of our programmes and the diversity of its participants) We will request your consent to process that personal information where required by applicable law
For remuneration and reimbursement purposes, in particular to reimburse expenses and, if you are awarded a scholarship, to pay the agreed financial support	For our legitimate business purposes (to reimburse expenses of those who wish to participate in our access to education and employment community programmes) and, depending on the circumstances, to perform a contract between you and us
To audit and monitor the use of our website and other technology tools	For our legitimate business purposes (the provision of the website and technology tools and to improve and ensure the security of those resources)
To maintain appropriate business records	For our legitimate interests
To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims	For our legitimate business purposes and for compliance with legal obligations to which we are subject

How long we keep your personal information

Your personal information will be retained in accordance with our global data retention policy which categorises all of the information held by Allen & Overy and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and Allen & Overy's business purposes.

Who we share your personal information with

As an international law firm, any information that you provide to us may be shared with and processed by any entity in the worldwide network of Allen & Overy. You can see a list of our offices at <http://www.allenoverly.com/locations/>.

We will also share your personal information with:

- third parties involved in organising, hosting, delivering or accrediting our education and employment community programmes, including our social enterprise partner Causeway Education and our accrediting body City & Guilds in the case of our Smart Start programme and our social enterprise partner MyKindaFuture in the case of our Restart programme;
- our clients and business partners where they provide work experience, mentoring, assist with the delivery of workshops and training or are otherwise involved helping us to deliver our education and employment community programmes;
- journalists and publicists reporting on or promoting our education and employment community programmes;
- Allen & Overy's social media sites such as Facebook, LinkedIn and Twitter to promote our education and employment community programmes;
- IT service providers and suppliers to whom we outsource certain support services such as word processing, photocopying and document review;
- legal and regulatory authorities, courts, tribunals, government agencies and law enforcement agencies; and
- our professional advisers and auditors.

Protection of your information

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws. Allen & Overy LLP holds the internationally recognised security standard BS ISO/IEC 27001:2013 in respect of its document management and email systems and the supporting infrastructure for Allen & Overy's offices globally. This is an independently verified certification that information security is managed in line with international best practice.

When we engage a third party service provider to collect or otherwise process personal information on our behalf, the third party is selected carefully and will be required to have appropriate security measures in place.

Transferring information outside the United Kingdom

For the purposes set out in this Privacy Policy, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it. This may entail a transfer of your information from a location within the European Economic Area (the **EEA**) to outside the EEA, or from outside the EEA to a location within the EEA. Please see 'Who we share your personal information with' for more detail on how the information may be shared with Allen & Overy offices and third parties.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses (as contemplated by Article 46(2) of the European Union's General Data Protection Regulation) are in place between all Allen & Overy entities that share and process personal data. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses. For more information about the measures in place, please contact us (see section below 'Who to contact with questions or concerns').

Your rights in respect of your personal information

The European Union's General Data Protection Regulation and other applicable data protection laws provide certain rights for the individuals whose personal information we process.

You are entitled to request a copy of the information we hold about you and information about how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict or suspend our processing of that information, to object to our processing of your information and, in some circumstances, to request receipt or transmission to another organisation, in a machine-readable form, of personal information relating to you that you have provided to us. Where we rely on your consent to process your personal information, you have the right to withdraw your consent at any time. You also have the right to lodge a complaint with a local supervisory authority in relation to our processing of your personal information.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see section entitled 'How and on what basis we use your personal information'). Please note that, even after you have chosen to withdraw your consent, we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up-to-date. Therefore, please advise us of any changes to your information by emailing us at probonoteam@allenovery.com.

Who the data controllers are

A 'controller' is the organisation that makes the decisions about how and why your personal information is processed. In most cases, the controller of your personal information in relation to our education and employment community programmes will be Allen & Overy LLP. In certain circumstances, another Allen & Overy entity may also be a controller of your personal information. Please visit <http://www.allenovery.com/legal-notices/country-specific/Pages/default.aspx> for details of the Allen & Overy entity through which we practise law in each jurisdiction and, where necessary having regard to local applicable data protection or privacy laws, a country-specific privacy notice.

Changes to our privacy notice

Any changes we make to this privacy notice will be posted on the corporate responsibility section of our website, www.allenovery.com/corporate-responsibility/probono-community/education. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

This Privacy Policy was last updated in October 2019.

Who to contact with questions or concerns

Application Questions: If you have questions about our education and employment community programmes, or wish to update the personal information we hold about you, please contact Kate Cavelle at kate.cavelle@allenovery.com.

Privacy Questions/Complaints: If you have questions, complaints or need further information about our Privacy Policy or practices, please contact our Head of Data Privacy, using the details below:

Jennifer Brannigan
Head of Data Privacy
Allen & Overy LLP
68 Donegall Quay

Belfast
Northern Ireland
BT1 3NL
Email: DataPrivacy@allenovery.com
Tel: +44 (0) 28 9060 7500