



Debate Mate Schools Limited: Privacy Policy

This Privacy Policy explains how we use the personal information that Debate Mate Schools Limited collects or generates both in relation to this website and our products and services.

The list below sets out what is covered in this Privacy Policy:

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- 2. THE PRODUCTS AND SERVICES WE PROVIDE**
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1. BACKGROUND

- 1.1 Debate Mate Schools Limited with its registered office at CAN Mezzanine, 7-14 Great Dover Street, SE1 4YR collect and use certain Personal Data. Debate Mate Schools Limited is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.
- 1.2 At Debate Mate Schools Limited we respect the privacy of our clients and we are committed to keeping all your Personal Data secure. This Privacy Policy governs the handling of Personal Data by Debate Mate Schools Limited in the course of carrying on our work.
- 1.3 We use the following definitions in this Privacy Policy:

“**Debate Mate Schools Limited**”, “**we or “us”**” means Debate Mate Schools Limited .

“**Personal Data**” means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Debate Mate Schools Limited (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Debate Mate Schools Limited or any other person in respect of an individual.

2. THE PRODUCTS AND SERVICES WE PROVIDE

- 2.1 This Privacy Policy concerns the following categories of information that we collect about you when providing the following products and services:
 - (A) Information we receive through our website, www.debatemate.org ("Debate Mate Schools Limited **Website**");
 - (B) Information we receive through our products, programmes (this is including but not limited to the Debate Mate Core Programme, our bespoke student and teacher training, partnership work) and services ("Debate Mate Schools Limited **Products**");
 - (C) Information we receive through our support, mobile security solution or cloud-based services ("Debate Mate Schools Limited **Services**").

3. THE TYPES OF PERSONAL DATA WE COLLECT

- 3.1 Many of the services offered by Debate Mate Schools Limited require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. In relation to each of the services described at paragraph 2.1 above, we will collect and process the following Personal Data about you:



- **Information that you provide to Debate Mate Schools Limited.** This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):
 - basic Personal Data (such as first name; family name; position in your company or school; company or school name; your company or school email address; business phone number; business address; city; postcode; country; mobile number);
 - Sensitive Personal Data such as bank details, health information (only necessary for the vital interests of the data subjects), FSM/EAL/SEN information of individual students for reporting (this can be anonymised); any information that you choose to share on Debate Mate Schools Limited internet forums and web-based forms which may be considered Personal Data. (Please note that Debate Mate Schools Limited does not collate information included on Debate Mate Schools Limited internet forums together with Personal Data from your User Center account or profile);

- **Information that we collect or generate about you.** This includes (by way of non-exhaustive list):
 - a file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you and can contact you with additional related offers and services;
 - If you are a mentor, your DBS certificate number, issue data and reference, which will be shared with third parties for safeguarding purposes. If you have a criminal conviction, this information can only be accessed by our Safeguarding Officer;
 - Student registers for each school to enable us to report on attendance;
 - Ethnic origin information in order to fulfill equal opportunity purposes, as the processing is necessary for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment between persons of different racial or ethnic origins, with a view to enabling such equality to be promoted or maintained;
 - through our cloud security services, traffic and security reports that include information on the internet usage of the organisation's computer users (e.g. what websites were visited by each user, any documents downloaded, security incidents, prevention measures taken by the gateway, etc.); and

- **Information we obtain from other sources.**

- **Cookies.**
 - When you visit the Debate Mate Schools Website, cookies are used to collect technical information about the services that you use, and how you use them.

- **Anonymised data**
 - In addition to the categories of Personal Data described above, Debate Mate Schools Limited will also process further anonymised information and data that is not processed by reference to a specific individual.



4. HOW WE USE YOUR INFORMATION

1.1 Your Personal Data and Sensitive Personal Data may be stored and processed by us in the following ways and for the following purposes:

- for ongoing review and improvement of the information provided on Debate Mate Schools Limited Website to ensure they are user friendly and to prevent any potential disruptions or cyber attacks;
- To collect feedback on Debate Mate Schools Limited Products and Services and to help provide more information on the use of those products and services quickly and easily;
- to communicate with you in order to provide you with services or important information about Debate Mate Schools Limited Products and Services;
- to understand your needs and interests;
- to effectively report to our potential and current funders;
- for the management and administration of our organisation and the successful delivery of our programmes;
- to comply with Safeguarding laws, including but not limited to disclosing mentors' DBS information to schools;
- to understand any health risks that might affect the data subject when taking part in an international programme;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; and
- for the administration and maintenance of databases storing Personal Data.

1.2 However we use Personal Data we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include:

- we need to do so in order to perform its contractual obligations with our customers;
- we have obtained your consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and administer the operation of our work;
 - maintaining compliance with internal policies and procedures, including our Child Protection and Safeguarding Policy and Photography and Sharing Images Policy;
 - monitoring the use of our copyrighted materials; and
 - enabling quick and easy access to information on Debate Mate Schools Limited Products.

1.3 We will take steps to ensure that the Personal Data is accessed only by employees, third parties and contractors of Debate Mate Schools Limited that have a need to do so for the purposes described in this Privacy Policy.



2. **DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES**

2.1 We may share your Personal Data within Debate Mate Schools Limited for the purposes described above, and will ensure that the third parties are authorised and enter into a written agreement with us to ensure they comply with our Data Protection Policies and Procedures:

2.2 We may also share your Personal Data outside of the Debate Mate Schools Limited for the following purposes:

- with our business partners. For example, this could include our partners from whom you or your company or your organisation purchased the Debate Mate Schools Limited product(s). Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;
- with third party agents and contractors for the purposes of providing services to us (for example, Debate Mate Schools Limited's accountants, professional advisors, IT and communications providers and debt collectors). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this policy;
- to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend its legal rights;
- if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

3. **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

3.1 Debate Mate Schools Limited is a global organisation. Our customers and our operations are spread around the world, as we deliver programmes outside of the U.K., and our mentors help us deliver these programmes. As a result we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

3.2 Where we transfer your Personal Data to another country outside the EEA, we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of Europe, for example, this may be done in one of the following ways:



- the country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Data (Israel is an approved country);
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your Personal Data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- in other circumstances the law may permit us to otherwise transfer your Personal Data outside Europe.

3.3 You can obtain more details of the protection given to your Personal Data when it is transferred outside Europe (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in paragraph 11 below.

4. **HOW WE SAFEGUARD YOUR INFORMATION**

4.1 We have extensive controls in place to maintain the security of our information and information systems. All files containing personal and sensitive personal data are protected with safeguards according to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

4.2 As a condition of employment, Debate Mate Schools Limited employees are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those employees who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by a Debate Mate Schools Limited employee is prohibited and may result in disciplinary measures.

4.3 When you contact a Debate Mate Schools Limited employee about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

5. **HOW LONG WE KEEP YOUR PERSONAL DATA**

5.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- the purpose for which we are using it – Debate Mate Schools Limited will need to keep the data for as long as is necessary for that purpose to a maximum of five years; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.



If you have any questions regarding how long specific personal data may be retained, please contact us using the details in Section 8.

6. YOUR RIGHTS

6.1 In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation, such as mentor DBS information;
- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to Debate Mate Schools Limited;
- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;
- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

6.2 You can exercise your rights by contacting us using the details listed in paragraph 11 below.

7. DESIGNATED REPRESENTATIVE

7.1 Debate Mate Schools Limited's registered office may be contacted using the following contact information:

Address: Debate Mate, CAN Mezzanine, 7-14 Great Dover Street, SE1 4YR



Email Address: dataprotection@debatebate.com

- 7.2 Debate Mate Schools Limited's designated representative in the EU may be contacted using the following contact information:

Address: Debate Mate Schools Limited, CAN Mezzanine, 7-14 Great Dover Street, SE1 4YR

Email Address: dataprotection@debatebate.com

8. **QUESTIONS AND CONCERNS**

- 8.1 If you have any questions or concerns about Debate Mate Schools Limited's handling of your Personal Data, or about this Policy, please contact our Executive Director or Educational Development Director using the following contact information:

Address: Debate Mate Schools Limited, CAN Mezzanine, 7-14 Great Dover Street, SE1 4YR

Email Address: dataprotection@debatebate.com

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our Privacy Officer, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, Debate Mate Schools Limited's' Privacy Officer will provide you with the contact information for that regulator.