CEI Privacy and Cookie Policy

The Centre for Employment Initiatives Ltd (CEI) is dedicated to protecting your privacy. This policy explains **what** information we collect, **why** we collect it, and **how** we manage and protect it in line with the **UK GDPR**, **EU GDPR**, and the **Data Protection Act 2018**[1].

Effective Date: 1 November 2025
Reviewed: 1 November 2025
Data Protection Officer (DPO): Louise Holland
Contact: louise@cei-international.org

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1. Our Approach to Processing Your Data (Lawful Basis and Principles)

We commit to processing all personal data **lawfully, fairly, and transparently** (a core principle of GDPR). This means we must always have a **valid legal reason** (a 'lawful basis') for using your data.

We rely on the following lawful bases to ensure our processing is justified:

1. Consent: If we need your data for a specific purpose (e.g., sending you a marketing newsletter), we will ask for your **clear, informed, and unambiguous agreement**. **You can withdraw this consent at any time**. *Example in Practice:* We ask for your explicit consent before processing **Special Category Data** like health or ethnicity information.
2. Contractual Necessity: Processing is necessary to **perform a contract** we have with you (e.g., as an employee, consultant, or project partner) or to take steps you request *before* entering a contract. *Example in Practice:* Using your **Identity** and **Contact Data** to manage your consultancy relationship or process your references.
3. Legal Obligation: We must process data to **comply with the law** (e.g., tax, audit, or safeguarding requirements). *Example in Practice:* Retaining financial records for a legally required period for audit purposes.
4. Legitimate Interests: We process data where it's **necessary for our legitimate business operations** (e.g., maintaining website security, improving our services). This is only used when your fundamental rights and freedoms **do not override** our interests. *Example in Practice:* Using anonymised website analytics to improve user experience.

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2. What Data We Collect and How

We collect data only when it is **adequate, relevant, and limited** to what is necessary for the stated purpose.

Data Category	Examples of Data Collected	How We Get the Data [cite: 16]
Identity Data	Name, title, job title, date of birth.	**Directly** (via forms, email)
Contact Data	Email, phone number, postal address.	**Directly** or from **Third-party sources** (e.g., partners)
Employment Data	Work history, references, DBS checks.	**Directly** or from **Third-party sources** (e.g., subcontractors, public platforms like LinkedIn)
Technical Data	IP address, login info, cookies, access logs.	**Automated technologies** (when you visit our website)
Special Category Data	Health, ethnicity (only with explicit consent or legal requirement)	**Directly**

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3. How We Use Your Data (Purposes)

We use your data only for the specific purposes we informed you about, which include:

- To **deliver and manage** our research, projects, and services.
- To **manage recruitment** and consultancy relationships.
- To **comply with legal obligations** (e.g., audit, safeguarding, and accountability).
- To **maintain website security** and functionality using analytics.
- To **communicate** with you about updates or events *if you have opted into them*.

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4. Data Management and Security

Data Security: We protect your data from loss, theft, and unauthorised access using **technical and organisational measures**.

- This includes **encryption, multi-factor authentication, and role-based access**[23].
- All staff complete **annual GDPR training**.
- Sensitive research data is **pseudonymised** and stored securely.

Data Sharing and International Transfers: We only share your data when necessary and lawful.

- Third-party service providers (processors) must sign **Data Processing Agreements (DPAs)** confirming their GDPR compliance.
- For transfers outside the UK or EU, we ensure **equivalent protection standards** are in place, typically using the **UK Addendum to the EU Standard Contractual Clauses**[28282828].

Data Retention: We only keep your personal data **as long as necessary** for its original purpose or to meet legal requirements.

- For audit purposes, we generally retain data for **seven (7) years**.
- After the retention period, the data is **securely deleted or anonymised**.

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5. Your Data Protection Rights

You have clear rights regarding your personal data under UK and EU GDPR (Individual Rights). We commit to facilitating these rights:

- **Access:** The right to be informed and to obtain a copy of your personal data we hold.
- **Rectification:** The right to correct inaccurate or incomplete information.
- **Erasure (Right to be Forgotten):** The right to request the deletion of your data in certain circumstances.
- **Restriction/Objection:** The right to restrict or object to how your data is processed.
- **Portability:** The right to receive your data in a structured, commonly used format.
- **Withdraw Consent:** The right to withdraw any consent you have previously given at any time.

To exercise any of these rights, please contact the DPO at louise@cei-international.org . If you are not satisfied with our response, you can raise a complaint with the **UK Information Commissioner's Office (ICO) at www.ico.org.uk** .

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6. Cookies

We only use **essential and anonymised analytics cookies**.

- Cookies are small text files that help a website function.
- Our cookies help us understand how people use our website to **improve user experience**, but **they do not personally identify you**.
- You can manage or block cookies via your browser settings.