



Privacy Notice

About this document

This Privacy Notice explains how the Swire Chinese Language Foundation (“SCLF”, “we”, “our”, “us”) collects, uses and shares personal data, and your rights in relation to the personal data we hold.

We are a registered charity (registration number 1171995) and our registered office address is Swire House, 59 Buckingham Gate, London, SW1E 6AJ.

SCLF will be the controller of your personal data under the UK General Data Protection Regulation and other UK data protection laws. We may change this Privacy Notice from time to time.

How we collect your information

We may collect your personal data in a number of ways, for example:

- When you communicate with us by post, telephone, fax, email or other forms of electronic communication – for example when you make enquiries about the SCLF;
- From information provided to us by your organisation in connection with the Swire Chinese Language Programme (“**Programme**”);
- From other individuals or organisations seeking to introduce us to you;
- From research we might carry out into organisations (and therefore relevant contacts at such organisations) that might be interested in the Programme;
- If you upload materials to our website (www.bamboo.ac, the related teaching materials portal, (together the “**Website**”)) including content, reviews, recommendations, comments, blogs, teaching materials for Mandarin language teaching and other materials (“**Materials**”). [If you use the AI functionality on the Website, which is powered by Google Gemini, to upload Materials, Google Gemini will analyse the uploaded Materials and generate suggested responses for the compulsory fields of the content upload form. If the Materials contain your personal data, this may be collected by Google. Personal data collected by Google is governed by [Google’s privacy policy](#).]

The categories of data we collect

We may collect the following categories of personal data:

- Your name, job title, the name of the school you work for and contact information such as address, email address and telephone number, such as when you submit information to us;
- Technical information collected through the use of cookies about your use of our Website including details of your domain name, location and internet protocol (IP) address, operating system, browser version, the content you view, and how long you stayed on a page (for more information see our [Cookies Policy](#)); and
- Information concerning your engagement with us, including records of communications between you and us.
- If you upload Materials to our Website (in particular, teaching materials) we will collect your name, email address and Website password. We may also collect, if you choose to share it, your Chinese name, your profile photograph or avatar, information about your role and yourself, your level of teaching experience, your Mandarin language ability, your time zone, your employment history relating to teaching and your teaching specialisation.

The basis for processing your data, how we use that data and with whom we share it

1. Legitimate interests

We may process your personal data because it is necessary for our or a third party's legitimate interests. This will always be weighed against your rights, interests and expectations. Our legitimate interests include the operation of SCLF in accordance with our charitable objects. Examples of where we process personal data in accordance with our legitimate interests include:

- To carry out the day-to-day operation of the Programme and to correspond with you about our charitable services and activities;
- To evaluate proposals submitted to us for involvement in the Programme;
- Collecting information relating to the plans and progress of each of our centres / participating schools.
- Processing enquiries, complaints and analysing our charitable services;
- Processing technical information about your use of our Website to ensure that content on our Website is presented in the most effective manner; and
- Making Materials available on our Website.

In this respect, we may also provide your personal data to the following (where this is necessary for our or a third party's legitimate interests):

- The other Swire charitable entities and initiatives and John Swire & Sons Limited, which provides us with some back-office support;
- Third party service providers who we may engage to assist in delivering services to you or the organisation you represent;
- Our bank, to whom payment details are provided in order to process payments (where relevant);
- Our website operator, who may store details such as name and email address to enable you to communicate with us;
- Our professional advisers, where it is necessary for us to obtain their advice or assistance; and
- Other professionals who assist us, e.g. website management / IT support.

[When you upload Materials to the Website, you will have the option to use AI functionality powered by Google Gemini to assist with the upload process (for example, to explain the contents of the Materials and how they can be useful to other educators). Whilst the AI functionality will not have direct access to your profile or the information contained within it (for example, your name, email address, profile photograph etc), if you choose to use the AI functionality, and if the Materials that you have uploaded contain your personal data, your personal data may be shared with Google and processed in accordance with [Google's privacy policy](#). You will be able to amend any of the content that is generated by the AI functionality before it is published on the Website and potentially at other times after it has been published. Additionally, the output generated by the AI functionality may be used to improve the model for other Site users. SCLF and Google each rely on their legitimate interests to collect and process personal data for these purposes.]

2. Legal obligations

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data to comply with subject access requests of others, tax legislation, Charity Commission requirements, for the prevention and detection of crime, and in order to assist the police and other competent authorities with investigations (including criminal investigations). In this respect, we may provide your personal data to our professional advisers, where this is necessary for us to obtain their advice or assistance.

3. Consent

In some circumstances we may seek your specific consent to process your personal data: for example, if we wish to use your name, likeness or an attributed quote on our website or in marketing materials; or in respect of research we carry out or commission into the performance of the Programme over time; or where we wish to put you in touch with other funders and external agencies and/or representatives of other organisations involved in the Programme. In addition, if you upload Materials to the Website, you can choose how much of your information is made available to other users of the Website in connection with Materials that you have uploaded (including where you choose to use the AI functionality, as above).

If you have given your consent and you wish to withdraw it, please contact us using the contact details below. Please note that where our processing of your personal data does not rely on your consent, we may not be able to fulfil your request (please see 'Your Rights' below).

Retention of your data

We may retain your personal data for as long as is necessary to deliver our charitable services to the organisation you represent, and to protect our legal interests (for example where required by relevant authorities, or for a reasonable legal limitation period) or as otherwise stated to you when your data is collected, or for such period as we reasonably consider appropriate in connection with our relationship with you and/or the organisation you represent/ed; or for record-keeping and archival purposes.

Please note that if you have uploaded Materials to the Website and later choose to delete your account with us, we may still retain some personal data relating to you, for example where it is included in Materials previously uploaded to the Website.

Your rights

- To be informed what personal data we hold about you and/or to obtain access to it (i.e. by receiving a copy of it in a permanent form);
- To require us to correct the personal data we hold about you if it is inaccurate;
- To require us (in certain circumstances) to erase your personal data;
- To request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply: for example, if we have reason to believe the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Notice.

You can find out more about your rights under data protection legislation at www.ico.org.uk.

Questions and concerns

If you have any questions or concerns about how we process your personal data, or you wish to exercise any of the rights set out above, you may contact us:

- By email: help@bamboo.ac
- By telephone: 020 7834 7717

If you are not satisfied with how we are processing your personal data, you can raise a concern with the Information Commissioner (www.ico.org.uk).