

Data Protection Policy

1. *Personal data* – “Personal data” is any information about a living individual that allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation that applies in the United Kingdom including the General Data Protection Regulation (GDPR) and other local legislation relating to personal data and rights such as the Human Rights Act.

2. *The organisation*

This Privacy Policy is provided by [*the organisation*], which is the data controller for your data.

- We may collect your personal data from information you provide via our website: [*the website URL*].
- We may collect your personal data from correspondence to our postal address, which is: [*the postal address*].
- We may collect your personal data from correspondence sent to us via email.
- We may collect your personal data as the result of telephone conversations, or exchange of text or social media messages with our staff or management.
- We may collect your personal data as the result of financial transactions with our organisation,
- We may collect your personal data as the result of contractual arrangements with our organisation.

3. *Our data controllers include:*

- Our organisation
- Contractors and third-party service providers
- Credit reference agencies

4. *The personal data we may collect includes:*

- Names, titles, and aliases, photographs.
- Contact details such as telephone numbers, addresses, and email addresses.
- Where they are relevant to the products and/or services we provide, or where you provide them to us, we may process demographic information such as: gender; age; marital status; nationality; education and work histories; academic and/or professional qualifications; hobbies; family composition; and dependants.
- Where you pay for the products and/or services we provide, we hold financial identifiers such as your bank account details, payment card numbers, and payment/transaction identifiers.
- The data we process may include sensitive personal information or other special categories of data such as racial or ethnic origin; mental and physical health; details of injuries; medication/treatment received; political beliefs; trade union affiliation; genetic data; biometric data; and data concerning sex life or sexual orientation.

- The personal data collected via our website may include:
 - Information from synchronising with other software or services
 - Interaction with social media (functional and/or marketing)
 - Information about payments
 - Access to social media profiles
 - Demographic information
 - Information relating to our use of cookies and/or other automatic data collection features such as information on the device you are using; log information (including IP address); location information; device sensor information; site visited before arrival on our web pages; and browser type and/or the operating system used by your device.
 - Interaction with our website email forms
 - Information from other sources such as referral or recommendation programmes and/or publicly accessible sources.
5. *The organisation will comply with data protection law. This says that the personal data we hold about you must be:*
- Used lawfully, fairly and in a transparent way.
 - Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - Relevant to the purposes we have told you about and limited only to those purposes.
 - Accurate and kept up to date.
 - Kept only so long as it is necessary for the purposes we have told you about.
 - Kept and destroyed securely, including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure.
6. *We use your personal data for some or all the following purposes:*
- To deliver products and/or services that you have ordered and to understand what we can do for you and inform you of other relevant products and/or services.
 - To confirm your identity to provide products and/or services.
 - To contact you by post, email, telephone or using social media – Facebook, Twitter, WhatsApp.
 - To help us to build up a picture of how we are performing.
 - To prevent and detect fraud and corruption for the law enforcement functions where necessary.
 - To enable us to meet all legal and statutory obligations arising from our business activities.
 - To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury.

- To promote the interests of the organisation.
- To maintain our own accounts and records.
- To seek your views, opinions or comments on our performance or the performance of our products and/or services.
- To notify you of changes to our facilities, services, events, and our staff and other stakeholders.
- To send you communications that you have requested and that may be of interest to you. These may include information about products and/or services, events, other new projects or initiatives.
- To process relevant financial transactions including payments for products and/or services supplied to our organisation.
- To allow the statistical analysis of data so we can plan the provision of products and/or services.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

7. *The legal basis for processing your personal data*

Most of your personal data is processed as an integral part of our day-to-day business activities. Sometime when engaging in these activities it is necessary to process personal data of people with whom we come into contact. When we do this, we will always take your interests and rights into account. This Data Protection Policy sets out your rights and the organisation's obligations to you in detail.

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the delivery of products and/or services to you, or the hiring of services or the purchase of products from you.

Sometimes our use of your personal data requires your consent. We will first obtain your consent to that use.

8. *Sharing your personal data*

The organisation will implement appropriate security measures to protect your personal data. This section of the Data Protection Policy provides information about the third parties with whom the organisation will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software.
- On occasion, other organisations with which we are carrying out joint ventures.

9. *How long we keep your personal data*

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of eight years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with statutory obligations. We are permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example three years for personal injury claims or six years for contract claims. We will retain some personal data for this purpose so long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

10. *Your rights and your personal data*

You have the following rights with respect to any of your personal data we hold:

- The right to access personal data we hold on you.
- The right to correct and update the personal data we hold on you.
- The right to have your personal data erased.
- The right to object to processing of your personal data or to restrict it to certain purposes only.
- The right to data portability.
- The right to withdraw your consent to processing at any time for any processing of data to which consent was obtained.
- The right to lodge a complaint with the Information Commissioner's Office.

When exercising any of the rights listed above, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

11. *Transfer of data outside the European Economic Area (EEA)*

Any personal data we transfer to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas, so on occasion some personal data (for example in a newsletter) may be accessible from countries outside the EEA.

12. *Further processing of your personal data*

If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, we will provide you with a Privacy Notice explaining this new use prior to starting processing, which will also set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

13. *Changes to this policy*

We keep this Data Protection Policy under regular review and we will place any updates on our website. This Policy was last updated in April 2018.

14. *Contact details*

Please contact us if you have any questions about this Data Protection Policy, or the personal data we hold about you, or to exercise all relevant rights, queries or complaints.

[*Organisation contact details*]