

# **BCCT PRIVACY NOTICE**

### **INTRODUCTION**

Bude Coastal Community Team CIC ("BCCT") Company No. 11738907 is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

Our email address is contact@budecoastalteam.org.uk

Our postal address is Unit 22, Bude Business Centre, Kings Hill Industrial Estate, Bude, Cornwall EX23 8QN.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at contact@budecoastalteam.org.uk.

In this privacy notice, we set out how we collect and use your personal data before, during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all our current and former employees, volunteers, workers and contractors and it does not form part of any employment contract or any other services contract with us.

We may update this notice at any time and these can be found here www.budecoastalcommunityteam.org.uk. This notice was last updated on 11<sup>th</sup> May 2020

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

# **DATA PROTECTION PRINCIPLES**

We will comply with data protection law including the 6 principles of GDPR which are:

- 1. To process your personal data lawfully, fairly and in a transparent way.
- 2. To collect your personal data only for valid purposes that we have advised you about and to not use your personal data in any way that is incompatible with those purposes (unless we have notified you and explained the lawful ground that allows us to do so).
- 3. To only process your personal data to the extent necessary for the purposes we have advised you about.

- 4. To keep your personal data accurate and kept up to date.
- 5. To keep your personal data only as long as necessary for the purposes we have told you about.
- 6. To keep your personal data secure.

#### PERSONAL DATA THAT WE PROCESS

Personal data means any information about an individual from which that person can be identified. It does not include anonymous data where the identity has been removed.

There are "special categories" of more sensitive personal data which require a higher level of protection such as your ethnicity or health information.

We will collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- We collect information about our funders, volunteers, and employees
- We do not collect, store, and use any "special categories" of more sensitive personal information:

### **HOW WE COLLECT YOUR PERSONAL DATA**

We collect personal data about you through our website, telephone, and email directly and from information you give to us directly, for example when you:

- Sign up to take part in or attend one of our fundraising or support events
- Make a donation
- Discuss with us a proposed project
- Request information from our team
- Choose to share your story with us
- Take part in surveys, questionnaires or get involved with us
- Volunteer with us or apply to work with us
- Sign up to our e-newsletter
- When you visit our websites, we collect technical information such as the IP address you use to visit the website, your browser type and version
- Contact us or become involved with us in any other way not listed above.

# Information from third parties

We may also receive information about you from third parties if you have given them permission to share this information and indicated that you wish to support us.

Depending on your settings or the privacy policies for social media and messaging services, we may access information from those accounts or services.

## Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at contact@budecoastalcommunityteam.org.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new volunteer	Contact	Legitimate Interest
To communicate with you for marketing (a) or general communication (b)	a) Contact b) Contact	a) Consent b) Legitimate Interest
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Keeping records up to date (c) Discussion about a project	Contact	<ul> <li>a) Legitimate Interest</li> <li>b) Necessary to comply with a legal obligation</li> <li>c) Necessary for our legitimate interests to keep our records updated</li> </ul>
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Contact b) Technical	<ul> <li>a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise</li> <li>b) Necessary to comply with a legal obligation</li> </ul>

# **Marketing communications**

You will receive marketing communications from us if you have:

- requested information from us; or
- if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at contact@budecoastalcommunityteam.org.uk at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of your participation as a Volunteer, supporter, employee, or contractor.

#### **HOW WE USE SENSITIVE DATA**

"Special categories" of sensitive personal data require higher levels of protection than non-sensitive data. In order to process such sensitive data we need to have further justification. Although we do not process special categories of personal data we would adhere to the regulations which stipulate the following criteria:

- a) In limited circumstances, with your explicit written consent.
- b) Where we need to carry out our legal obligations or exercise rights in connection with employment.

### TRANSFERS TO THIRD PARTIES

We may have to share your personal data with third parties, including third-party service providers for example because it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Third party providers may carry out the following services: IT services as an example.

We require third parties to respect the security of your data and to treat it in accordance with the law. They must act only in accordance with our instructions and they agree to keep your personal data confidential and secure.

### TRANSFERS OUTSIDE OF THE EEA

We do not transfer your personal information outside the EEA. If we do, you can expect a similar degree of protection in respect of your personal information.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you are no longer an employee, volunteer worker or contractor of BCCT we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

### RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal information changes.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact The Chairman, BCCT, Unit 22, Bude Business Centre, Kings Hill Industrial Estate, Bude Cornwall EX23 8QN in writing.

You will not have to pay a fee to access your personal data or to exercise any of the other rights under data protection laws. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email us at contact@budecoastalcommunityteam.org.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **BCCT COOKIES POLICY**

# Use of cookies and other online technology

### Cookies and similar technologies

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites

Our cookies help us:

- Make our website work as you would expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you
- Make our marketing more efficient (ultimately helping us to offer the service we do at the price we do)

# Granting us permission to use cookies

If the settings on your browser that you are using to view this website are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

## How long do cookies last?

When a web server sends a cookie, it asks your browser to keep that particular cookie until a certain date and time. These dates can be:

- Some date in the future Might be a few minutes or a few hours from now (to track something like your shopping cart in an online store). The cookie might expire many years in the future, to keep track of your browser for a long time
- When you close your browser Called a session cookie, the next time you start your browser these will have vanished
- Some date in the past This is how the server asks a browser to remove a previouslystored cookie

### Our own cookies

We use cookies to make our website work including:

- Remembering if you have accepted our terms and conditions
- Allowing you to add comments to our site
- Remembering if we have already asked you certain questions (e.g. you declined to take our survey)

There is no way to prevent these cookies being set other than to not use our site.

## Site improvement cookies

We regularly test new designs or site features on our sites. We may do this by showing slightly different versions of our websites to different people and anonymously monitoring how our site visitors respond to these different versions. Ultimately this helps us to offer you a better website experience.

# Anonymous visitor statistics cookies

We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using, how long they spend on the site, what page they look at, etc. This helps us to continuously improve our website. These analytics programs also tell us, on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before, helping us to develop our services for you.

Our site uses the following analytics programmes: Google Analytics

In some cases, these third party platforms may also collect some or all of the above information using cookies or similar technologies. Where they do so, their collection, use and protection of your information is governed by those third parties' privacy policies and practices, and not this privacy policy.

You may be able to opt-out of third party advertising technologies (including cookies) which remember your browsing habits and try and display relevant advertising when you use our websites, app(s), or services by visiting www.youronlinechoices.com/uk/your-ad-choices. If you choose to turn off these technologies, we may still serve you ads but these ads are unlikely to be tailored to your interests.

We do not store personally identifiable information, but we do use the information we gather to help improve the experience of our website. For example, they help us to identify and resolve errors, or to determine the most relevant information and services to show our visitors in the future.

We may update this Policy at any time and it can be found at www.budecoastalteam.org.uk.

This Policy was last updated on 11 May 2020