



## **This is the privacy policy of Cullercoats Collective CIC**

Please read this policy carefully, along with our Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

Cullercoats Collective CIC is registered in England and Wales under Company Number [12801135](#).

Cullercoats Collective operates two website: [www.cullercoatscollective.co.uk](http://www.cullercoatscollective.co.uk) and [www.visitcullercoats.co.uk](http://www.visitcullercoats.co.uk)

Cullercoats Collective CIC is committed to protecting your personal data and being transparent about what we do with it. We are committed to using your personal data in accordance with all applicable laws and regulations concerning the protection of personal data and not to do anything with your data you wouldn't reasonably expect.

### **This Privacy Policy explains:**

#### **What is personal data?**

Personal Data is defined in the General Data Protection Regulations as:

'Any information relating to an identified or identifiable natural person\*'

\*A natural person is a living individual.

So, personal information is any information that can be used to identify you. For example it can include information such as your name, date of birth, gender, postal address, marital status, email address, telephone number, fax number, IP address and credit card/debit card details.

Cullercoats Collective CIC collects personal data relevant to the nature of your relationship with us.

Data Protection law recognises that certain categories of personal information are more sensitive. This is known as 'Special Category Data' and covers health information, racial or ethnic origin, religious beliefs or other beliefs of a similar nature.

We will only collect 'special category data' where there is a clear need to do so. Before collecting any 'special category data' about you we will make it clear to you what information we are collecting and the purposes for collecting such information.

## **Our Purpose**

In the course of our business we need to collect and store personal data to carry out our activities, recruit staff and volunteers, fundraise, and organise events along with the general administration of our business.

Full details of our objects and aims can be found on the Companies House website: [www.gov.uk/government/organisations/companies-house](http://www.gov.uk/government/organisations/companies-house).

We will always endeavour to be clear, honest and transparent with you whenever we collect and use personal data. The policy summarises the different reasons why and how we may collect and use your data. We may not use your personal data for all these purposes; it will depend on the nature of your relationship with us and how you interact with Cullercoats Collective CIC as an organisation.

## **Lawful Processing**

Cullercoats Collective CIC, like all organisations in the UK, needs a lawful basis to collect and use your personal data. The law allows for six legitimate purposes which organisations can rely on to legally process people's personal data. Of these only four are relevant to us as a Community Interest Company for the type of activities we are involved with:

- Information is processed on the basis of an individual's consent.
- Information is processed in line with a contractual relationship.
- Information is processed on it being a legitimate interest for Cullercoats Collective CIC to do so.
- Information is processed to protect the vital interests of an individual or another person – such as disclosing medical information in the event of a medical emergency.
- Please note we may also share your personal data when we are compelled to do so by a legal authority acting in compliance with the law.

## **Legitimate Interest**

The law allows personal data to be legally collected and used by an organisation if it is necessary for a legitimate business interest of the organisation – as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned.

Cullercoats Collective CIC's legitimate interests are;-

- Governance
- Delivery of our purposes as set out in our articles of association.
- Reporting criminal acts and compliance with legal instructions of law enforcement agencies.
- Internal and external audit for financial or regulatory compliance purposes.
- Statutory reporting.
- Publicity and Income Generation
- Conventional direct marketing by direct mail and other forms of marketing, publicity or advertisement.
- Fundraising.
- Operational Management
- Employee and volunteer recording and monitoring for recruitment, safety performance management or workforce planning purposes.
- Physical security, IT and network security.
- Processing for statistical purposes.
- Financial Management and control
- Processing of financial transactions and maintaining financial controls.
- Prevention of fraud, misuse of services, or money laundering.
- Enforcement of legal claims.
- General Administrative Purposes
- Responding to enquiries from any of our stakeholders.
- Delivery of requested products, services, resources or information packs.
- Administration of direct debits and other financial transactions.
- Providing 'thank you' communications and receipts.

## **How we obtain your personal data**

How we obtain your personal data and our legal bases for processing.

We collect information in the following ways:

## **Donors**

Directly - We collect information when you donate to our work. This may be on forms such as gift forms or through our online giving platform. This may include your title, name and address including your postcode.

Indirectly - Sometimes when you donate to us, for example through our website, you may give us your information indirectly via online payment sites such as Paypal. Please familiarise yourself with these independent third parties own privacy policies. Your information will be passed to us to manage your donations as applicable. Such companies will not pass your information to us for marketing purposes unless you have given consent for them to do this. You can read our online giving platforms privacy policy see to read how your data is handled here - <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full#2>

The legal basis for this processing is our legitimate interest namely the proper administration of our business.

## **Volunteers**

If you are one of our valued volunteers we may need to use your personal data to manage your volunteering activities, deliver training, involve and update you on our projects and campaigns and to ensure your safety.

We will collect personal data from various sources including but not limited to: volunteer application forms, cv's, disclosure and barring service checks, references and legal documents such as your passport and driving licence. This may include your name, address, telephone numbers, email address, work history and qualifications and include some special category data (where appropriate).

The legal basis for processing is our legitimate interest, namely the proper administration of our business and vital interests to protect you in the event of an emergency.

## **Purchase of Goods and/or Services and Event Administration (Customers)**

When we sell goods and/or services or run events such as fun days, yoga, litter picking or community gardening etc we may require you to sign up and/or purchase a ticket either directly from us or online.

When you to sign up or purchase a ticket online or purchase an item we may use the services of a third party company to register you or process your payment eg Teemill, Eventbrite, Yapsody etc for ticketing services and Paypal, WooCommerce or Stripe for payment processing. Please familiarise yourself with the privacy policies of these companies.

The legal basis for this processing may be either contract (for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract) and/or legitimate interest namely the proper administration of our business.

## **Social Media**

We may obtain your personal data through your use of social media such as Facebook, Instagram, or Whatsapp depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

The legal basis for this processing is legitimate interest namely the proper administration of our business.

## **General**

We may process information when you contact us regarding any other general matter, e.g. to request information about our work, make a complaint or claim, respond to queries etc. This information may be obtained during telephone conversations, from letters and emails you have sent to us or on forms you have completed.

The legal basis for this processing is our legitimate interest namely the proper administration of our business.

## **We may use your information in the ways set out below:-**

- We use the information to provide you with the information, support, services or products you ask for.
- We use your information to gain a full understanding of your situation so we can develop and offer you the best possible personalised services as a volunteer or other user.
- We use your information to keep a record of your relationship with us and for internal administrative purposes (such as our accounting and records) and to let you know about changes to our services and policies.
- For internal record keeping so as to keep a record of your relationship with us.
- We use your information to look into, and respond to complaints, claims and other issues.
- We use your personal data to administer donations (where applicable).
- We use personal data to carry out statistical analysis and research in order to help us understand how we are performing and how we can improve our services and meet the needs of the people who require our help.

- When you log on to/visit our websites, we log your computers IP address. We use IP addresses to identify the location of users and block disruptive or suspicious use.
- We may also use your personal data for other purposes, which we will specifically notify you about and where appropriate, obtain your consent.
- To keep you informed about our work. Please see the section headed 'Marketing Preferences.'

### **Who do we share your information with?**

We will not sell your data to any third parties for their own marketing purposes, and you will not receive marketing from any other companies, charities, or other organisations as a result of giving your details to us.

In general we may share your information with the following:-

HMRC, training providers (eg for volunteers to access training), our accountants, banks/building societies, insurers and insurance brokers, solicitors, pension providers or other professional advisers insofar as is reasonably necessary for the purposes of maintaining banking services, insurance coverage, managing risks, obtaining professional advice and services, managing payroll, administering a pension scheme and the establishment, exercise or defence of legal claims.

### **Where legally required**

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies proving us with a relevant request in writing).

### **Marketing Preferences**

We love sharing news about our work. This includes sending you information about our work, news, appeals, campaigns, events, information on volunteering and fundraising opportunities.

We will only contact you if you have given us permission to do so. You can choose how you want to be contacted ie. by post, email, telephone and text (SMS) or by a combination of all four, it's entirely up to you.

You may withdraw your consent at any time by emailing :-[info@cullercoatscollective](mailto:info@cullercoatscollective) or writing to us at the address at the bottom of this document.

## **Data Security**

We maintain a high level of physical and electronic security in relation to the collection, storage and disclosure of your information. We take reasonable steps to ensure that any information we hold about you is protected.

When we collect your data we use strict procedures and security features in order to prevent unauthorised access. However no data transmission is 100% secure. As a result, while we try to protect your personal information, Cullercoats Collective CIC cannot guarantee the security of any information you submit to us over the internet and you do so at your own risk.

The transmission of information is encrypted and protected using Secure Socket Layer (SSL) where possible.

## **International Data Transfers**

We may transfer to, and store some data at, a destination outside the European Economic Area (“EEA”), for example to a cloud storage system (google drive) who uses storage facilities outside the EEA.

In the circumstances, your personal data will only be transferred on one of the following bases:

- Where the transfer is subject to one of more of the “appropriate safeguards” for international transfers prescribed by applicable law (eg standard data protection clauses adopted by the European Commission);
- A European Commission decision provides that that country or territory to which the transfer is made ensures an adequate level of protection; or
- There exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

## **Retaining and deleting personal data**

This section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Sometimes it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention at the time of collection.

We may retain your personal data where such retention is necessary for compliance with legal and regulatory requirements to which we are subject or in order to protect your vital interests or the vital interests of others. We will also retain personal data for as long as you might legally bring claims against us.

In general we will retain your personal data as follows:

**Donors** - We will keep records of donations given to us through our third party online payment provider in line with their policy. Please familiarise yourself with these independent third parties own privacy policies.

**Event Participants** - We will keep your personal data for three years after the date of the event or activity.

Signed Photograph, Social Media and Press consents will be kept indefinitely.

**General Contact** - We will keep your personal data for as long as you consent for us to hold it.

**Volunteers** - We will keep your personal data in accordance with legal and regulatory requirements and in line with our volunteer data retention policy, a copy of which is available by contacting our Data Protection Officer.

Signed Photograph, Social Media and Press consents will be kept indefinitely.

## **Your Data Protection Rights**

Where Cullercoats Collective CIC is using your personal data on the basis of your consent, you have the right to withdraw your consent at any time. You also have the right to ask us to stop using your personal information for direct marketing purposes.

Right to be informed: you have the right to be told how your personal information will be used. This policy document and summary statements used on our communications are intended to be a clear and transparent description of how your data may be used

Right of Access: You can request access to any data we hold about you by contacting our Data Protection Officer at % 32 Mast Lane, North Shields, NE30 3DE email: [info@cullercoatscollective.co.uk](mailto:info@cullercoatscollective.co.uk)



From May 2018 we will have 30 days to comply once we are satisfied you have the right to see the requested records and we have successfully confirmed your identity. We may withhold personal information that you request to the extent permitted by law.

**Right of Rectification:** If you believe our records are inaccurate or incomplete you have the right to ask for those records concerning you to be corrected and/or updated.

**Right to restrict processing:** In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate use.

**Right of erasure:** In certain situations you have the right to request that your data to be erased when there is a problem with the underlying legality of the processing.

**Data Portability:** Where we are processing your personal data under your consent, the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to another and is unlikely to be relevant to your relationship with Cullercoats Collective CIC.

**Right to object:** You have an absolute right to stop the processing of your personal data for direct marketing purposes.

**Right to object to automated decisions (profiling):** In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions 'that have a legal effect on you', you have the right to object. This is more applicable to finance or mortgage situations. Cullercoats Collective CIC does not undertake complex computerised decision making that produces legal effects.

## **Data Anonymisation**

Your data may from time to time be converted into statistical or aggregated data which can't be used to identify you, then used to provide statistical research and reports. This aggregated data may be shared with third parties for funding applications and grant reporting in connection with our aims and objectives.

## **About Cookies**

### **Cookies In use on our Sites**

### **Cookies and how they Benefit You**

Our websites use 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.

We use a third party privacy and cookie management system for our website specific data collection in addition to this policy. You can read the privacy policy for [cullercoatscollective.co.uk](https://www.iubenda.com/privacy-policy/99247999) here <https://www.iubenda.com/privacy-policy/99247999> and the cookies policy for [cullercoatscollective.co.uk](https://www.iubenda.com/privacy-policy/99247999/cookie-policy) here <https://www.iubenda.com/privacy-policy/99247999/cookie-policy>

You can read the privacy policy for [visitcullercoats.co.uk](https://www.iubenda.com/privacy-policy/40353660) here <https://www.iubenda.com/privacy-policy/40353660> and the cookies policy here <https://www.iubenda.com/privacy-policy/40353660/cookie-policy>

## **Reporting Concerns**

Please contact us if you wish to raise a concern about our handling of your data. In the first instances please talk to us directly so we can help resolve any problem or query.

You can contact our Data Protection Officer by writing to us at:-  
% 32 Mast Lane, North Shields, NE30 3DE

Email: [info@cullercoatscollective.co.uk](mailto:info@cullercoatscollective.co.uk)

You also have the right to contact the Information Commissioners Office about data protection using their helpline 0303 123 1113 or at [ico.org.uk](http://ico.org.uk).

## **Changes to this policy**

We will review this privacy policy regularly and may update it from time to time for example, in the event of changes to the law or how we operate. We will publish a new version on our websites. You should check our websites regularly for updates. If there are any significant changes in the way we process your data we will provide a prominent notice on our website.

This policy is written in accordance with the Data Protection Act 1998 and General Data Protection Regulations 2018.

Cullercoats Collective CIC is registered with the Information Commissioners Office under registration reference ZA898871

If you have any questions about this privacy policy, please contact our Data Protection Compliance Officer at;-

% 32 Mast Lane, North Shields, NE30 3DE

Email : [info@cullercoatscollecitve.co.uk](mailto:info@cullercoatscollecitve.co.uk)