

## Privacy Policy

Last updated	18 <sup>th</sup> April 2019
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### How we respect privacy when we deal with personal information collected by our organisation

This Privacy Policy applies to information we TRANSPIRE collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it. If you have any comments or questions about this notice, feel free to contact us at [INFO@TRANSPIRESOUTHEND.ORG](mailto:INFO@TRANSPIRESOUTHEND.ORG)

#### 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Book Keeping	Name, Address, Email, Bank Sort Code, Bank Account Number	Legitimate interests – It is necessary for us to store financial records of payments made and received with other organisations and individuals.
Funding	Name, Address, Email	Legitimate interests – this information is necessary to assist us during the process of producing and completing grant and funding applications.
Sales	Name, Email, Address, Phone Number, Payment Information	Legitimate interests – by making a purchase we need some or all of this information to deliver a product and/or service in addition to any confirmation messages of your order.
Donations	Name, Email, Address, Phone Number, Payment Information	Legitimate interests – by making a donation we need some or all of this information for audit purposes and to send any confirmation messages/letters of your donation.
Events (Registration)	Name, Email, Age	Consent – You have given consent for this information to be collected while at an event. The email is used in case a member wins a prize but was not available to collect. There is also an opt in to be added to our mailing list. Registrations help track attendance figures and basic

		demographics around age. This data is used internally to help improve event quality/relevance and to report back to existing and future donors. No identifiable/personal information is given out to any 3 <sup>rd</sup> parties.
Membership	Name, Membership number	Consent – You have given consent to collect this information while registering as a member. This information is only used internally.
Mailing list	Email	Consent – You have given consent to be part of our mailing list. The information allows us to send subscribers newsletters issued by Transpire.
Volunteers	Name, Email, Phone Number	Consent – You have given consent for us to use this information to contact you about volunteering matters including your details being listed in our internal volunteer directory.
Hate Crime Reporting	Name, Address, Email, Phone Number, Details of hate crime	Consent – this information has been given with consent to a Hate Crime Ambassador who will relay hate crime reports confidentially to Essex Police.
Disclosure and Barring Service (DBS)	Name, Address, Date of Birth, Identity Documents, Trusted Government Documents, Financial and social history documents	Consent – Some or all of this information will be collected and used as part of our safeguarding measures to ensure volunteers can undertake relevant roles on behalf of Transpire. We use an external umbrella company, Essex County Council to perform our DBS checks.
Images	Individual / group photography	Legitimate interests – images are captured for the purpose of documenting our events for internal and external promotion and to share with existing and future donors including our vendors who may wish to show support to the group by promoting our events.

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

## 3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or we are required by law to share your data.
- In the event that life or safety is threatened, we will pass information on to emergency services

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

## 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required. Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

## 5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website.

We use WordPress for this purpose. WordPress generates statistical and other information about website usage by means of cookies, which are stored on users computers. The information collected by WordPress usage of our website is not personally identifiable. The data is collected anonymously, stored by WordPress and used by us to create reports about website usage. You can view WordPress's privacy policy here <https://en-gb.wordpress.org/about/privacy/>

MailChimp is our preferred mailing list tool. MailChimp generates statistical information including anonymous data such as country locations of where newsletter views are coming from. Cookies are also used to track usage data such as views and clicks which are attributable to an email address only. Although not currently used by Transpire the tool also provides sales tracking data. You can view MailChimp's privacy policy online here <https://mailchimp.com/legal/privacy/>

## 7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.