

PRIVACY POLICY

OUR PRIVACY & DATA POLICY



Privacy Notice – Growing Sudley CIC

1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us or access our services. It also explains how we'll store and process that data and how we'll keep it safe.

2. What is Growing Sudley?

- Growing Sudley Community Interest Company, originally a sub-group of the Friends of Sudley Estate, was established in 2017 as a Community Interest Company limited by Guarantee (11110406). The enterprise is regulated by the Community Interest Company Regulator.
- Growing Sudley is a social enterprise that aims to bring the dilapidated Victorian Walled Garden at Sudley Estate back into use as a therapeutic garden, to make it accessible and to use growing, exposure to nature and the outdoors to benefit the health and wellbeing of the community.
- For simplicity throughout this notice, 'we' and 'us' means Growing Sudley CIC.

3. Explaining the legal bases we rely on

The General Data Protection Regulation sets out a number of different reasons for which an organisation may collect and process your data. These include:

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in condition with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, A contract is an agreement between parties which is binding in law and therefore we will have to supply anonymised data to our commissioners who fund us to demonstrate the work we have delivered.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in criminal activity affecting the organisation to law enforcement.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, where processing enables us to enhance, modify, and improve the services we deliver to the community

4. When do we collect your personal data?

We collect your personal information in a number of ways:

- Registration form (when an individual first comes in contact with our services)
- Via our website through the booking form system, subscribing to email newsletters, and 'Contact Us' form
- Questionnaires when accessing our services
- Via booking forms or other purchasing/payment methods

5. What sort of personal data do we collect?

We may collect the following personal information;

- Name
- Gender
- Date of Birth
- Address
- Email
- Telephone
- Information gathered by the use of cookies in your web browser
- Information gathered by Google Analytics
- Credit/debit card information when paying for some of our services

6. How and why do we use your personal data?

We collect this information for the following purposes:

- To protect our organisation and you from fraud and other illegal activities. (Legal compliance)
- To comply with our contractual or legal obligations to share data with law enforcement. (Legal compliance)
- To supply anonymised data to the commissioners who fund us to demonstrate the work we have delivered. (Contractual obligation)
- To send you email newsletters or other communications about our services. (Consent)

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide to you. For example, updates to this Privacy Notice. These service messages do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations. (Legitimate interest)
- To enhance, modify, and improve the services we deliver to the community. (Legitimate interest)
- To participate in research studies to evidence the benefits our service has on the people and communities it supports. (Legitimate interest)

7. How we protect your personal data

- We will treat your data with the utmost care and take all appropriate steps to protect it.
- We secure access to all transactional areas of our website and apps using 'https' and 'SSL' technology.
- Google Analytics is committed to GDPR and the protection of the data it stores. Google Analytics is certified by the EU Privacy Shield and ISO 27001. Further information regarding how Google Analytics safeguards your data can be found [here](#).
- Access to your electronic personal data is password-protected and securely stored.
- Paper based personal information is locked away securely in our office filing systems.

8. How long will we keep your personal data for?

- Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.
- At the end of that retention period, your data will either be deleted completely or anonymised so that it can be used in a non-identifiable way for statistical analysis and reporting to funders.

Examples of data retention periods:

- Employee records are kept for 6 years following termination of Contract.
- Participant/Service user data is kept for 7 years and then becomes anonymised for the purposes mentioned above.
- Personal information collected in relation to children is kept indefinitely.

9. Who do we share your personal data with?

We will not share your personal data with any third parties without seeking your consent first.

10. Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- We may be required to disclose your personal data to the police or other enforcement, regulatory or Government body, upon a valid request to do so.
- For fraud management, we may share information about fraudulent or potentially fraudulent activity on our premises or in our systems. This may include sharing data about individuals with law enforcement bodies.

10. Where could your personal data be processed?

The data Growing Sudley collects is processed and stored exclusively within the United Kingdom.

11. What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop any consent-based processed of your personal data after you withdraw that consent.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- The right to request that all of your personal data is erased from our systems.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We will then do this unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

You can contact us to request to exercise these rights at any time as follows:

- **Telephone:** 07771997724
- **Email:** growingsudley@gmail.com
- **Post:** Data Protection Officer, Growing Sudley, 43 Penny Lane, Liverpool L18 1HR

12. Contacting the Regulator

We will deal with all requests for information and breaches with diligence, but if you feel that your data has not been handled correctly, or you are unhappy with our response to any request that you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113 or go online to www.ico.org.uk/concerns