

The Pump House Project

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A) Privacy Statement

Who we are

Based in Faringdon, Oxfordshire, The Pump House Project (TPHP) is your community centre; running a weekly timetable of activities, events, classes and clubs for the whole community. Our aim is to provide a variety of low cost activities for all ages and abilities in Faringdon and the surrounding villages. TPHP is a registered non-profit charity. TPHP is financed through generous donations and fundraising.

How we use your personal details

We collect and process personal information, such as name, address and contact details. Your information will have been collected by us solely from information supplied by you. Most of the data we collect is used to keep in touch with you and to keep you up to date with news and updates. We do this using only your email address. In certain circumstances we will also collect and hold other personal details such as phone numbers and postal addresses.

We want to be completely transparent about why we need the personal details we request when you join or register with us and how we will use your details.

When we will get in touch

We email regular e-newsletters, updates about news, activities and fundraising events at TPHP and other initiatives. You will have indicated to us that you are happy to receive these messages. You can cancel these notifications at any time.

Your rights

You have several legal rights to control what we do with your information. You can request from us a copy of the information we hold about you. You can request us to correct or update information that is wrong. You can request that we stop using your data or delete your data, in which cases we will cease to contact you.

We will not share your data

We keep your information confidential and will not share your information with third parties, unless we are required to do so for emergency health, legal or regulatory purposes.

Changing your communication choices

If at any time you wish to change how we communicate with you, or update the information we hold, please do get in touch.

Write to us:

The Pump House Project
Swan Lane
Faringdon
SN7 7AF

Or **Email us:** info@thepumphouseproject.co.uk

What details we ask for and why

We ask for the minimum information from you to allow us to send you relevant communications.

Under 16?

We need to ask if you are aged under 16 as, anyone aged under 16 cannot legally give consent for Marketing.

If you are aged 16 or under, you will need to get the permission of your parent or guardian before registering to receive email newsletters or other communications from us.

We do not knowingly collect or solicit information from anyone under 16 or knowingly allow such persons to provide us with their personal information without parent or guardian consent.

In the event that we learn that we have collected personal information from anybody aged 16 or under and do not have the consent of a parent or guardian, we will delete that information as quickly as possible.

Cookies

Our website uses Cookies to track how often you visit our site.

How long we keep your information

We do not keep your information for longer than we need to, data that is no longer required or that we have identified as having been collected without consent will be deleted.

Security

We are committed to ensuring that your information is secure with us and remains confidential and accurate.

Use of Photographs

We regularly take images of our activities at TPHP or at other venues where we are operating. We use some of these images on our web site, on social media and in print to promote the activities of TPHP. We try and ensure that the subject(s) of the photograph(s) (or a parent/carer) grant permission for their image to be used for our promotional purposes. If you wish your image not to be used or removed from our promotional material you can tell us at any time.

Complaints

If you have any queries about our Privacy Policy, how we handle your data or for removal or correction of your data, please contact us.

Write to us:

The Pump House Project
Swan Lane
Faringdon
SN7 7AF

Or **Email us:** info@thepumphouseproject.co.uk

If we are unable to resolve your complaint you may take it to the Information Commissioner's Office (ICO).

B)Privacy Policy

1. INTRODUCTION

The Pump House Project (TPHP) is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

Starting in 2018, TPHP will ask its users to “opt-in” for marketing, registering for activities and general communications. This is due to a change to the rules which govern how we can communicate with you and a new regulation on personal data (the General Data Protection Regulation) coming into force in May 2018. Therefore, we are introducing a new approach that relies on individuals giving us your consent about how we can contact you. This means you’ll have the choice as to whether you want to receive relevant information and be able to select how you want to receive them (email, phone or post).

Individuals can decide not to receive communications or change how we contact you at any time. If you wish to do so, please write to us:
The Pump House Project, Swan Lane, Faringdon, SN7 7AF
Or **Email us:** info@thepumphouseproject.co.uk

We will never sell any personal data and will only ever share it with organisations we work with where necessary, and only if its privacy and security are guaranteed.

Questions?

Any questions you have in relation to this policy or how we use your personal data should be sent to :
The Pump House Project, Swan Lane, Faringdon, SN7 7AF
Or **Email us:** info@thepumphouseproject.co.uk

2. ABOUT US

Any personal data (i.e. any information which identifies individuals, or which can be identified as relating to you personally) will be collected and used by The Pump House Project. The Pump House Project is a registered charity No. 1151905.

The Pump House Project is based at The Pump House Project, Swan Lane, Faringdon, SN7 7AF. For the purposes of data protection law, The Pump House Project will be the controller.

3. WHAT INFORMATION WE COLLECT

The information we collect has been provided by you under the following circumstances; including but not limited to:

- Joining our central e-mailing list on our website.
- Joining an e-mailing list for a specific activity to be kept informed about that specific activity.
- Registering either yourself or your children/dependants for activities that we deliver (or that third parties deliver on our behalf)
- Joining our 200 Club fundraising initiative.
- Signing up to be a volunteer.
- Becoming a member of staff.
- Booking an event with us or booking use of the space.

The personal data that we collect includes but is not limited to:

- Name
- Address
- Phone number
- Emergency contact details (3rd party contact details)
- Email address
- Health conditions

Sensitive personal data

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about individuals. However, there are some situations where this will occur (e.g. if you register your child to take part in our Urban Movement Classes – there is a section on the disclaimer that relates to their relevant health conditions).

Accidents or incidents

If an accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data).

Volunteers

If you are a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

Staff

If you are a member of staff then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

Third parties

We collect third party contact details from individuals who are registering their child or dependant to take part in our Urban Movement Classes. These are collected for use in emergencies. This is used to protect children attending events and activities without parental supervision.

Health data

We collect relevant health data from individuals who are registering their child or dependant to take part in our Urban Movement Classes. This data is collected for use in emergencies. This is used to protect children attending events and activities without parental supervision.

3. HOW WE USE INFORMATION

We only ever use your personal data when we have consent to do so, the only exceptions to this are where it is necessary in order to:

- comply with a legal duty;
- protect vital interests;
- for our own lawful interests, provided an individual's rights don't override the these.

In any event, we'll only use information for the purpose or purposes it was collected for (or else for closely related purposes).

Marketing

We use personal data to communicate with individuals, to promote The Pump House Project and to raise awareness of our services and activities. This includes keeping you up to date with our news, updates, activities and events.

Administration

We use personal data for administrative purposes (i.e. to carry on our charity work). This includes:

- receiving donations / issuing prizes (e.g. 200Club)
- maintaining databases of our volunteers, members and supporters;
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

Urban Movement Academy

The registration forms that you are required to complete to take part in our Urban Movement classes have personal details on them, including health data, emergency contact details and 3rd party contact details.

These forms are securely kept on site during the classes and are accessible by our staff, volunteers and 3rd party specialist training staff. In the event of an emergency involving the subject of this personal data, these forms may also be given to members of the emergency services.

200 Club

For the purposes of issuing prizes and keeping you informed about the monthly 200 club, we hold personal data including names, addresses, phone numbers and email addresses. This details are held by consent upon registering for the 200 Club.

4. DISCLOSING AND SHARING DATA

We will never sell your personal data. If you have opted-in to receive our emails and newsletters, we may contact you with information about our partners, or third-party activities and events, but these communications will always come from TPHP and are usually incorporated into our own marketing materials (e.g. newsletters).

5. MARKETING

From May 2018, TPHP will ask its supporters to “opt-in” for most communications. This means you’ll have the choice as to whether you want to receive these messages.

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, please contact:

The Pump House Project, Swan Lane, Faringdon, SN7 7AF

Or **Email us:** info@thepumphouseproject.co.uk

What does 'marketing' mean?

Marketing does not just mean offering things for sale, but also includes news and information about:

- our charity, other local organisations and the wider voluntary sector;
- our events, activities and those of local groups.
- Fundraising opportunities
- Local art initiatives

Our main mailing list v's other activity specific mailing lists

We run a main mailing list which you can subscribe to via the website. During this process you will be asked to acknowledge and accept our privacy statement and 'opt-in' to receive our news and updates. These emails will cover the entirety of our activities, news, events and fundraising. You can also ask join mailing lists that relate to one specific activity (such as The Crafty Crew or Urban Movement) in which case you will only receive information about a particular activity.

Unsubscribing from one or either of these two types of mailing list does not automatically unsubscribe you from the other.

6. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means).

Payment security

The Pump House Project does not collect or store personal bank details.

Paper files

Paper files and forms are stored securely in locked cupboards or drawers.

7. STORAGE

Where we store information

TPHP's operations are based in the UK and we store our data within the European Union. Some organisations which provide services to us (website hosts) may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

Paper forms

Registration forms that are required to be onsite during the running of specific classes are securely stored within the building. Staff, volunteers and 3rd party staff have access to this information in case of an emergency.

Electronic storage

Personal data that is stored by us is held on secure password protected cloud storage.

Email mailing lists are kept within secure password protected mailing accounts.

How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

8. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether we store your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.
- Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to:

The Pump House Project, Swan Lane, Faringdon, SN7 7AF

Or **Email us:** info@thepumphouseproject.co.uk

Complaints

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

10. COOKIES AND LINKS TO OTHER SITES

Cookies

- We use cookies to provide you with a better service. Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service to recognise you and make your next visit easier and the Service more useful to you. The use of cookies is an industry

standard and many major websites use them to provide useful features for their customers. Cookies do not themselves personally identify users, although they do identify a user's computer. Most browsers are initially set to accept cookies however if you prefer, you can set your browser to refuse cookies. If you do refuse cookies you may not be able to take full advantage of the functionality of websites or services.

Links to other sites

- Our website may contain hyperlinks to other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working).
- If an external website requests personal information from you the information you provide will not be covered by TPHP's Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.
- When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with TPHP.

10. CHANGES TO THIS PRIVACY POLICY

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated on XX.XX.XXXX

C) Data Protection, Use and Storage

1. Purpose

This policy recognises the need to protect personal and sensitive data as specified by the General Data Protection Regulation (2018). The regulation applies to 'controllers' (those responsible for determining the purpose and means of processing personal data) and 'processors' (those responsible for processing personal data on behalf of a controller). This applies to personal data; any information relating to an identifiable person, including name, identification number, contact details or online identifiers.

The aim of our policy is to be unambiguous in the collection, use and storage of personal data for the purposes of our services.

2. Principles of the policy

Under the GDPR, the data protection principles set out the main responsibilities for an organisation.

Article 5 of the GDPR requires that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or

statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Article 5(2) requires that:

“The controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

3. Consent

Consent must specifically cover the controller’s name, the purposes of the processing and the types of processing activity. Consent must be freely given, unambiguous and involve a clear affirmative action.

Consent should be separate from other terms and conditions and should not generally be a precondition of signing up to a service. The Pump House Project will ensure that all data collected and stored has been acquired using the correct opt-in method for individuals (no use of pre-ticked boxes or any other default consent). Clear records will be kept to demonstrate consent. Service users also have the right to access their personal data or request for it to be removed.

4. Use of data

OCVA will be transparent with its use of personal data:

- The purpose of collecting and using data will be clearly defined and explained.
- The organisation will not use the data for any other purposes than that for which it was collected.
- The organisation will not sell or share personal data to any third party or company without first seeking informed consent (see point 3).

5. Storage of data

The data collected for the purposes of our services will not be stored for longer than is deemed necessary for the use of the data. The retention period will be determined by the type of data being collected.

6. Staff commitment

Employees are required to comply with the terms of the General Data Protection Regulation (2018). In particular, it is important for sensitive personal data to be kept confidential. Any sensitive personal information will be kept confidential i.e. password protected and not stored for any longer than is necessary.

It is the responsibility of Chair of Trustees to ensure all staff / trustees / volunteers are aware of their duties and responsibilities regarding GDPR 2018. All staff / trustees / volunteers will be provided with a copy of this policy and will sign a statement to confirm that they have read and will abide by this policy.

7. Working from Home and Use of Personal devices

TPHP will provide advice and guidance to staff / trustees / volunteers working remotely or at home to maintain the security of data. This includes:

- staff / trustees / volunteers may use their home computer or personal laptop or other device e.g. smartphone or tablet for TPHP work. If using your own device this must be passcode protected.
- staff / trustees / volunteers are expected to take all reasonable steps to ensure the security of the TPHP network and TPHP data if logging on remotely, especially if this is through a computer that may be used by others.
- staff / trustees / volunteers will be aware of their work space at home or other locations and ensure no personal data is accessed by other people (e.g. family members)
- any paper-based notes will be stored in a locked drawer or cabinet, separate from the staff member's personal files.
- staff / trustees / volunteers will set up passwords on TPHP data files and email files to ensure that other users of the equipment cannot access TPHP data, on purpose or inadvertently
- staff / trustees / volunteers will not autosave passwords on computers or other devices.

8. Data Disposal

- On leaving TPHP staff / trustees / volunteers personal email accounts and access to other email accounts and computer programs will be deleted within 30 days.

- Data will not be kept beyond statutory requirements and will be disposed of in a timely manner.
- Data will be disposed of confidentially, ethically and permanently.

9. Changes this privacy policy

We'll amend this Data Protection, Use and Storage Policy from time to time to ensure it remains up-to-date. The current version of our Data Protection, Use and Storage Policy will always be posted on our website.

This Data Protection, Use and Storage Policy was last updated on 6 September 2018