

Community Lincs Privacy Policy

1. General

This privacy policy covers Community Lincs (CL) and its various projects and operations in support of improving social isolation and loneliness in Lincolnshire. It governs the privacy of its volunteers, members, and other users. The policy identifies the different areas where user privacy is concerned and outlines CL obligations and requirements. This document will be subject to review and revision, where necessary, on a regular basis.

Community Lincs is committed to comply with all current UK national and EU legislation and particularly Data Protection Act 1998 and General Data Protection Regulation 2018 – DPA98 and GDPR) and the requirements for user privacy.

2. CL Website and Personal Data collected electronically

The CL website is www.communitylincs.com. The way the CL website processes, stores and protects user data and information, and the measures taken by CL to secure hard copy data is detailed within this policy.

The CL website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users whilst visiting the site. The website is compliant with all current UK national and EU laws (General Data Protection Regulation 2018) and requirements for user privacy. The personal data that is collected by CL is for legitimate recording purposes only and to meet contractual obligations to funding organisations e.g. providing figures on demographic or geographic groups. No personal information or directly attributable details are disclosed, at any time, to any third party, unless agreement has been sought from the individual.

CL does not transfer any client data to other countries nor does CL sell any information on clients.

2.1 Use of Cookies

Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website.

Where applicable this website uses a cookie control system allowing the user, on their first visit to the website, to allow or disable the use of cookies on their computer /device. This complies with recent legislation requirements for websites to obtain explicit, unambiguous consent from users before leaving behind or reading files such as cookies on a user's computer / device. This website uses cookies in an effort to improve the users experience while visiting the website, but only by highlighting those pages that the visitor has used during that visit. ***No personal information about cookie usage is stored, saved or collected.***

Users are advised that if they wish to deny the use and saving of cookies from this website onto their computers hard drive they are advised to take necessary steps within their web browsers security settings to block all cookies from this website and its external partner's servers.

2.2 External Links

Although the CL website only looks to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links are clickable text/banner / image links to other websites, e.g. [Community Lincs](http://www.communitylincs.com)). Those links that we may, from time to time, place on our website are deemed to be from trusted, often third sector organisations that might be offering further opportunities within the sector, and we make every effort to ensure that those links are safe. However, CL

cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

3. Contact and Communication

Users contacting CL, either in person or by way of the CL website do so out of choice and provide any such personal details requested at their own discretion. All personal information is kept private and stored securely until such time as it is no longer required or has no use, as detailed in current Government regulations. CL has made every effort to ensure a safe and secure form to email details and requests to this organisation, and continue to review security of processes and the safety of client data in an effort to continuously improve services.

The CL website and its owners use any information submitted during a client's contact with CL to provide the client with further, requested information about the services that CL offers or to assist them in answering any questions or queries they may have submitted. This includes using their details to subscribe them to any email newsletter program, the organisation operates but only if this was made clear to them and their explicit permission was granted when submitting any form to email process, this is done using an opt in process. They have the right to unsubscribe from any mailing list at any time. Client details are not, and never will be passed on to any third parties, unless a GDPR agreement is in place with a partner organisation.

4. Data Collection and Usage

The data that CL collects (with the client's permission) is relevant to its declared activities and is not deemed excessive – we only collect what we need to support the individual or organisation. Our collected data is processed lawfully and accurately, and only in accordance with the rights of the individual whose personal information is being processed. When completing forms, clients are informed by letter or electronically as to how CL will make use of the data collected. CL will not use the information provided in any other way, without first notifying the individual concerned to get their permission. Files are only removed from CL offices for the purposes of the work being undertaken in the community and are returned as soon as possible; they are not left on desks or on unguarded computer screens for viewing by unauthorised individuals.

5. Individual's Rights

GDPR provide clients with significant rights in relation to processing of their personal information. They are:

1. The right to be informed about how and why their data will be used, and by whom.
2. The right to object to processing or direct marketing.
3. The right to have inaccurate information about them corrected.
4. The right to erasure of personal data (in specific circumstances).
5. The right of access their personal data so that they are aware of and can verify the lawfulness of the processing.
6. The right to restrict processing.
7. The right to data portability, which allows for the reuse of their personal data for their own purposes across different services.
8. Rights in relation to automated decision making and profiling.

CL is fully aware of the client's rights under GDPR and makes every effort to ensure that these rights are safeguarded.

6. Security and Retention of Data

CL employ significant security measures to protect client information from access by unauthorised persons and against unlawful access or processing, accidental loss, destruction and damage. We will retain your information for a reasonable period or as long as the law requires. Currently, CL aims to delete, anonymise (or pseudonymise) personal data (including hard copy files) after 6 years from the last date of contact. Our desktop workstations, laptops and tablets are kept password protected at all times, and locked when not in use. Portable HDs, USB drives, CD ROMs and DVDs are not used to transport personal data; all portable IT equipment and any hard copy data is kept in secure cabinets within locked and alarmed offices when not in use. Hard copy data is retained, only where necessary and in accordance with guidelines and contractual obligations, and destroyed by shredding.

Job Application forms of candidates, who are interviewed, are kept for six months, they are then shredded. Hardcopy of personnel records of current staff are kept securely in a locked cabinet, all electronic copies are kept on the CL server in a secure area only accessible by Senior Managers. Colleagues who leave CL have their information stored securely, both electronically and paper copy for 6 years, the files are looked at annually and any data that is 6 years old will be shredded or deleted from the system.

CL archive project information, both electronically and hard copy, the hard copies are kept off site and reviewed annually. Any electronic copies of project information is deleted when it is not relevant anymore. An archive list is kept up to date by the Resource Manager.

The Community Lincolnshire Insurance Services Files, both electronic and hard copy are retained in line with the Insurance Underwriters guidelines. Any files that are over 6 years old are stored in the Archives and can be retrieved anytime both electronically and hard copy.

Finance information is kept for 6 years, both electronically and hard copy, both of which are deleted annually if they are older than 6 years. The Finance Department works with the Resource Manager to ensure this is done.

7. Subscriptions

Subscriptions are taken in compliance with current UK legislation. All personal details relating to subscriptions are held securely and in accordance with DPA98 and GDPR. No personal details are passed onto third parties or shared with companies/people outside of CL unless specifically allowed by the client (e.g. passing personal details for referral to volunteering organisations). Under the DPA98/GDPR you may request a copy of personal information held about you by this organisation, by contacting the nominated Data Controller. No fee will be payable under GDPR. If you would like a copy of the information held about you please write to the business address at the bottom of this policy. Your request will be processed within 30 days, unless there are specific circumstances that delay this process. You will be informed of any delay, and its reason.

CL does not have a policy of tracking emails. However, applications such as Survey Monkey and Eventbrite will monitor the number of emails opened, without recording or giving personal details about users. The figures from such activity are used to refine future email campaigns by CL.

In compliance with UK legislation subscribers are given the opportunity to unsubscribe at any time through an automated system. This process is detailed at the foot of each email.

8. Volunteers

Our volunteers are very important to CL and its operations. Accordingly we have a separate policy specific to them and their privacy rights are reiterated in it. If you would like a copy please contact the Data Controller, details at para 13 below.

9. Email Newsletter

This organisation operates an email newsletter program, used to inform subscribers about services supplied by this organisation (this can be volunteering opportunities, training, or forums). If users have given their explicit permission to receive these newsletters, and later change their mind, they can unsubscribe through an online, automated option found at the bottom of the newsletter should they wish to do so.

10. Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate/engage upon them with due care and caution in regard to their own privacy and personal details. CL will never ask for personal or sensitive information through social media platforms, and we encourage users wishing to discuss any such details to contact us (CL) through primary communication channels such as by telephone, in person or email.

This website may, from time to time, use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

11. Shortened Links in Social Media

CL may share web links to relevant web pages. By default some social media platforms shorten lengthy URLs [web addresses] (this is an example: <http://bit.ly/zyVUBo>). Users are advised to exercise caution and good judgement before clicking any shortened URLs published on social media platforms. Despite the best efforts to ensure only genuine URLs are published, many social media platforms are prone to spam and hacking and therefore CL cannot be held liable for any damages or implications caused by visiting any shortened links.

12. Shortcuts to Privacy Policies of Platforms used by CL

The following are links to the privacy policies of the various platforms and applications that are used by CL in the pursuit of its business.

<https://www.facebook.com/about/privacy/>

<https://twitter.com/en/privacy>

<https://mailchimp.com/legal/privacy/>

https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB

<https://www.surveymonkey.co.uk/mp/policy/privacy-policy/>

Further information about data protection and GDPR can be found at these two links:

<https://ico.org.uk/for-organisations/data-protection-reform/>

<https://www.ncvo.org.uk/practical-support/information/data-protection?highlight=WyJnZHByllo=>

13. Further Requests for Information:

CL also maintains a policy for Subject Access Request.

In the event that you require access to the data that CL holds on you, you should contact the Data Controller, by writing to the following address.

The Data Controller
Community Lincs
The Old Mart
Church Lane
Sleaford
Lincs.
NG34 7DF

Or you can telephone 01529 302466 and request to speak with the Data Controller.