

Action in rural Sussex: Privacy Policy

1. What data Action in rural Sussex keeps and why it keeps this data.

Action in rural Sussex takes privacy and the use of personal data extremely seriously. We ask that you read this privacy policy carefully as it provides details as to how and why Action in rural Sussex collects personal information and how this may subsequently be used.

It also clarifies the process through which you may make a request in order to identify information Action in rural Sussex holds, the purposes it is held for and any action you wish us to take regarding this i.e. retain, amend or delete it.

This policy applies to you if you use our products or services, over the phone, online, through our mobile applications or otherwise by using any of our websites or interacting with us on social media. It also applies to information we collect about job applicants and our former and current employees, former and current trustees as well as former and current organisational members;

If any of the following information is unclear or you have further questions then please contact us via info@ruralsussex.org.uk or on 01273 473422.

2. Who are Action in rural Sussex?

Action in rural Sussex (also registered as a company as Sussex Rural Community Council) is an independent charity that exists for all people living in rural areas of Sussex but especially those who are at risk of isolation and/or disadvantage, and for whom rural life brings an additional challenge and cost to their daily lives.

Established in 1931, we are staffed by a highly experienced and dedicated team who are committed to helping people overcome the challenges caused by their rural location. Our vision is for a thriving, economically active rural Sussex full of choice and opportunities for everyone, regardless of their circumstances.

Action in rural Sussex has three operational aims:

1. To reduce the incidence and impact of disadvantage and poverty on people living in rural areas;
2. To increase the capacity of rural communities to manage change for the benefit of all their members; and
3. To inform and amplify the voice of rural communities to influence public policy.

3. What information we collect about you and why.

We process personal information to enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution; administer membership records; to fundraise and promote the interests of the charity; manage our employees and volunteers and maintain our own accounts and records.

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent. For example, when signing up to receive newsletters or email bulletins. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you purchase services or resources from us, we may collect your address and contact details in order to provide you with access to them.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we may pass on details of any persons suspected of participating in fraud or criminal activity to the appropriate law enforcement organisations.

Legitimate interest

In specific situations, we may require your data in order to pursue our legitimate interests in a way which might reasonably be expected as part of running our organisation. For example, we may use your contact details or address in order to provide you with information associated with the provision of a service, such as a newsletter or e-bulletin.

4. What sort of personal data do we collect?

We may obtain, store and maintain a range of personal data through a variety of different channels. Set out below are the main means through of the types and forms of personal data which we possess. *Please note that this is not necessarily a definitive list.*

Enquirees and participants

If you contact us in relation any of the services, programmes, projects, events or activities with which we are associated then we may collect and retain details such as your name, address, email address, phone number (including mobile) and your relationship to any organisations that you are associated with or operating on behalf of (including your position or role). On occasion we also collect other information as the need arises.

Employees and Trustees

In relation to both current and former employees and trustees we may hold and retain personal information including (but not restricted to): name, address, email address, phone number (including mobile), any organisations that you are associated with or operating on behalf of (including your position or role) as well as financial and qualification information and documents associated with eligibility to work.

Subscribers, Supporters and Members

If you have a subscription or membership account with us then we may retain details such as your name, address, email address, phone number (including mobile), any organisations that you are associated with or operating on behalf of (including your position or role) and your payment status.

Users of our website or social media platforms

Details of your visits to our website and which site you came to ours from, as well as information about any devices you have used to access our services (including the make, model and operating system, IP address, browser type and mobile device identifiers).

Your social media username, if you interact with us through those channels.

Information gathered by the use of cookies in your web browser.

Cookies and other information gathering technology

In using our website, cookies may be placed on your computer. These are text files which collect information as to how visitors navigate through our website. This data is primarily reviewed via Google Analytics in order to track visitor user and compile anonymised statistics on this.

Website browsers can be set so that they do not leave cookies, however, this can impact on the functionality of the website. For more information on cookies please visit www.aboutcookies.org or www.allaboutcookies.org

Personal contact details and information preferences if you choose to subscribe to our e-bulletin. This may include:

- your name (first name/surname);
- email address;
- whether you are an individual or represent an organisation (and if so, which organisation);
- your postal address;
- district;
- county;
- post code.

5. When do we collect your personal data?

- When you register for one of subscription or consultancy services.
- When you subscribe via the website to our email updates.
- When you engage with us on social media.
- When you contact us by any means with queries, questions, complaints or other forms of engagement (face-to-face, over the phone, in writing or electronically).
- When you ask any of our staff to email you information about a service, project or programme.
- When you express an interest in attending or book to attend an event that we are running.
- When you choose to complete any surveys we send you, either directly or on behalf of other organisations.
- When you've given a third party permission to share with us the information they hold about you.
- When we collect data from publicly-available sources when you have given your consent to share information or where the information is made public as a matter of law.

6. How and why do we use your personal data

Our goal in meeting our organisational objectives and activities is to provide a high quality of service. Data privacy law allows the retention of personal data as part of our legitimate interest in operating our organisation.

To make our services available to you and to respond to your queries, messages and complaints, we handle the information you send that enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience. If you wish to change how we use your data - please refer to section 11.

We may use your personal data in the following ways:

- to contact you in the provision of advice and support;
- to take payments from you or make payments to you;
- to contact you about the products and services that we provide;
- to protect our organisation and you from fraud and other illegal activities;
- to comply with our contractual or legal obligations to share data with law enforcement;
- to process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud;
- to develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests;
- to send you survey and feedback requests to help improve our services.

7. How we protect your personal data

Personal data and the protection of it is something that Action in rural Sussex take extremely seriously. We use physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data. Access is only provided to employees who need it to carry out their job responsibilities.

We may ask for proof of identity before we share your personal data with you.

We employ computer safeguards such as password-protection, firewalls and data encryption, as well as physical access controls to our buildings and files to keep this data safe.

Whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

8. How long will we keep your personal data

In collecting or processing your personal data, we are committed to only retain it for as long as is necessary for the purpose for which it was collected or in order to comply with legal,

contractual or legislative requirements or best practice. For example, the retention of financial and accounting information, employee records, minutes of meetings, insurance details etc.

9. Who do we share your personal data with

On occasion we may share your personal data with trusted third-parties. Examples of this sharing may include: IT companies who support our website and other electronic and financial systems and operational companies such as delivery couriers and mail providers. However, we work closely with them to ensure your data and privacy is respected and safeguarded at all times.

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or government body, in your country of origin or elsewhere, upon a valid request to do so.

Where necessary or required we share information with:

- family, associates or representatives of the person whose personal data we are processing;
- employees;
- current, past and prospective employers;
- healthcare, social and welfare organisations;
- educators and examining bodies;
- financial organisations;
- employment and recruitment agencies;
- survey or research organisations;
- business associates and professional advisers;
- providers of goods and services;
- local and central government;
- other voluntary and charitable organisations.

10. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties outside of the UK and/or the European Economic Area (EEA), such as Australia or the USA.

This is primarily due to these locations being the site of key service providers such as those providing web-based or IT services e.g. Survey Monkey, Eventbrite, Mail Chimp etc.

11. What are your rights over your personal data

You have a number of rights in relation to the way that we use your personal data, these include:

- access to the personal information that we hold about you;

- amendments or corrections to the personal data that we hold about you, especially where it is incorrect out-of-date or incomplete;
- that we stop using your personal data for direct marketing. We must always comply with your request.

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.

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 must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

To ask for your information, please contact our Data Protection Officer:

Email: info@ruralsussex.org.uk including 'FAO Data Protection Officer' in the subject line, identifying in the body of the email the specific request that you are making.

or

In writing: please provide a written request to:

FAO Data Protection Officer – Subject Access Request
Action in rural Sussex
Suites F7 to F9
Waterside Centre
North Street
Lewes
East Sussex
BN7 2PE

12. How can you stop the use of your personal data for direct marketing

There are several ways you can stop direct marketing communications from us:

- click the 'unsubscribe' link in any marketing email communications that we send you (e.g. via Mailchimp). We will then stop any further emails;
- email us via info@ruralsussex.org.uk clearly identifying what direct marketing material you have received from us;
- provide us with a written request via:

FAO Data Protection Officer, Action in rural Sussex, Suites F7 to F9, Waterside Centre, North Street, Lewes, East Sussex, BN7 2PE.

Please be aware that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated. Please contact us if this continues.

13. Contacting the regulator

If for any reason you feel that your personal data has not been used appropriately, or that Action in rural Sussex has not provided an adequate response to a query that you have submitted then you can contact the body for overseeing this.

The [Information Commissioner's Office](https://ico.org.uk/concerns/) can be contacted in relation to any concerns via its website at: <https://ico.org.uk/concerns/> or by phoning: 0303 123 1113.

14. Any questions

If you have any questions regarding any of the information set out in this Privacy Policy or have a different query, then please contact us:

Email: info@ruralsussex.org.uk including 'FAO Data Protection Officer' in the subject line, identifying in the body of the email the specific request that you are making.

or

In writing: please provide a written request to:

FAO Data Protection Officer
Action in rural Sussex
Suites F7 to F9
Waterside Centre
North Street
Lewes
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This Policy is reviewed every 3 years and was last updated on 24th January 2019.