

7<sup>th</sup> June 2018



# **The Alice Cross Community Centre**

## **PRIVACY NOTICE POLICY**

**Policy No.**

**Version 1**

# Policy Revisions Record

Version	Date	Review date			
Version 1	29 <sup>th</sup> March 2019				

## 1. Introduction

The Alice Cross Centre is committed to protecting the privacy of all users of The Alice Cross Centre website and in all other communications with The Alice Cross Centre. This privacy policy governs the way The Alice Cross Centre uses, maintains and discloses information collected from users of The Alice Cross Centre website, or via paper forms or email communications or verbally.

The Alice Cross Centre is committed to developing long lasting relationships based on trust and ensuring that your right to privacy is maintained and protected.

## 2. Your rights

The General Data Protection Regulation (GDPR) states that personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## 3. What personal information do we collect and how do we collect it?

### Information The Alice Cross Centre collects and processes – personally identifiable information

The Alice Cross Centre may request or collect personal information from users in a variety of ways, including through online forms, paper forms, emails and other instances where users of the centre volunteer to give such information. All personal information is collected only with an individual's explicit verbal or written consent.

**The information The Alice Cross Centre collects is personal information that identifies you personally: As a volunteer or staff member, donator, customer, trustee or attendee or mailing list member of The Alice Cross Centre**

### Class Instructors and Room Hirers

People who attend the Alice Cross Centre in the capacity of Class Instructor are required to be compliant with regulations imposed by the General Data Protection Regulation (GDPR) and may share any personal data they collect from clients with the Alice Cross Centre. Obligation to observe GDPR compliance is embodied in the Instructors Contract signed by Class Instructors to affirm agreement to this policy.

The same obligations apply to people or organisations who hire the facilities at Alice Cross Centre for their own purposes.

### As a volunteer or member of staff with The Alice Cross Centre:

When you apply to be a volunteer or to become employed at The Alice Cross Centre, you will be asked to complete an application form, we will ask for your name, address and contact details. We ask for these contact details to be able to contact you to cover different hours, or advise we are unable to open due to adverse weather conditions or notify you of some change. We ask for your date of birth and status and you may choose not to answer them. When this information on age and status is requested it is used anonymously in aggregate on grant application forms.

We ask for your next of kin details in case you are taken ill unexpectedly and we needed to contact someone to notify them.

You can cease being a volunteer with The Alice Cross Centre at any time.

### Donators – paying a contribution to The Alice Cross Centre with/without Gift aid:

As a donator we will ask for your name, address and contact details so we can send you regular newsletters and so you can decide when we review, if you still wish to continue to be a donator. We also use your details when we are claiming gift aid back through HMRC on your donation to The Alice Cross Centre.

When completing our donator forms your bank details are only known by you as you pass them to your bank for a standing order.

You can stop being a donator at any time.

#### **As a Customer and or attendee of The Alice Cross Centre:**

As a customer, attendee or trustee we will ask for your name, address, and contact details so we can advise you by email or newsletter of our activities or changes or to invite you to attend events. As an attendee we ask for your date of birth, GP details, Next of Kin and any other relevant health information. We will ask you to complete a consent form which includes options for us to hold your data securely, to share your data with other relevant organisations such as NHS, Social Services or other charitable organisations we work with and to share information with your family members. We collect this data so we can support you whilst you are at the centre and so you can be involved in services such as Drive n Dine where we share your contact details with the transport charity Dawlish Community Transport or Volunteering in Health for transportation purposes. In the case of an emergency triage calls can be managed more effectively with some limited health or medication information from individuals and next of kin or family can be contacted.

For customers we will ask for copies of insurance and professional certification to validate our charity insurance and to protect users of the Centre

You can stop being an attendee, trustee or customer at any time.

#### **As a receiver on our mailing list:**

We will ask for your name and contact details – such as postal address and/or email address to send you our newsletter when you opt in to receive our newsletter.

You may decide to stop receiving this newsletter at any time.

#### **Photographs**

When taking photographs at an event at The Alice Cross Centre we will ask for explicit consent from adults and parents/guardians of child taking part for the photos to be used on our website or social media. As many of our events are in the public arena other members of the public may appear in background shots which may be unavoidable.

Notices will be placed at The Alice Cross Centre public events giving notification that photos may be taken by event photographers and where they may be published.

#### **How The Alice Cross Centre uses personal information**

The Alice Cross Centre will not in any way share this information with a third party either for free or by selling it, unless you specifically consented to such disclosures.

#### **4. Control and maintenance of your personal data**

The Alice Cross Centre shall retain your personal data in accordance with all applicable laws and remain consistent with the purpose in collecting your personal data and this may be stored on one or more databases directly maintained by The Alice Cross Centre. Although The Alice Cross Centre cannot guarantee that any loss, misuse or alteration of data will not occur; every effort is made to prevent such occurrences. Information will be regularly assessed for disposal and for renewal of your consent.

#### **Disclosure of information**

The Alice Cross Centre will only disclose your information where you have agreed to that disclosure or where we are legally obligated to do so such as a court order.

#### **5. How long we store and dispose of data**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information. This includes an encrypted hard drive as well as using locked filing cabinets and a password policy. We will only retain your

personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The Alice Cross Centre has a separate policy for the retention and disposal of personal data. Please see this policy for further information.

## Website

### Links to other websites

The Alice Cross website contains links to other sites. Please be aware that Alice Cross is not responsible for the privacy practices of such other sites. You are encouraged to read the privacy statements of each and every web site that collects personally identifiable information. The Alice Cross privacy policy as described herein applies solely to information collected by Alice Cross.

### Intellectual property on the website

The copyright, trademarks and all other intellectual property rights in the material contained in the website, together with the website design, text and graphics, and their selection and arrangement, and all software compilations, underlying source code and software (including applets) belongs to Alice Cross or is currently licensed to us, our subsidiaries or the providers of such information. All rights are reserved. None of this material may be reproduced or redistributed without our express written permission. You shall retain ownership of all copyright in data you submit to the website. You grant us a worldwide exclusive, royalty-free, non-terminable license to use, copy, distribute, publish and transmit such data in any manner subject to our obligations.

### Exclusions of liability re: website

We use reasonable endeavours to ensure that the data on the website is accurate and to correct any errors or omissions as soon as practicable after being notified of them. We do not guarantee that the website will be fault-free and do not accept liability for any errors or omissions.

We do not give any warranty that the website is free from viruses or anything else which may have a harmful effect on any technology and you should take your own safeguards in this area.

### Use of cookies on the Alice Cross website

A cookie is a piece of data stored on the user's computer tied to information about the user.

We use cookies to make the website work better. Some cookies are essential to make the website work.

Weatherheads Web ([www.weatherheadsweb.co.uk](http://www.weatherheadsweb.co.uk)) designed the Alice Cross website and use 1&1 website services ([www.1and1.co.uk](http://www.1and1.co.uk)) to host the website.

We use session ID cookies. For session ID cookies, once you close your browser or log out, the cookie terminates and is erased. Session ID cookies may be used by 1&1 to track user preferences while the user is visiting the website. They also help to minimise load times and save on server processing.

We use persistent cookies. A persistent cookie is a small text file stored on your computer's hard drive for an extended period.

Cookies used on the 1&1 website do not contain personally identifiable information.

### Cookies Table –

SN = strictly necessary – need for website to perform basic functions

F=Functionality – used to store user preferences

P=Performance – cookies that record usage i.e. that is pages which are visited

A = Advertising / tracking – cookies that display, manage and measure ads

S=sessional p=persistent and t=third party

Name	Why	More info
Facebook.com	t/F	These cookies are used when integrating Facebook and the sharing of content the Facebook feed. Facebook cookie policy  <a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
	s/SN	PHP – PHP is the computer language used by this website. Web servers are not able to maintain information about a user, so PHP solves this by use of the PHPSESSID cookie. It uses the cookie to temporarily store user information for use across multiple pages. An example use: store a simple message when a form is submitted that can be displayed on a different page.
WAH accessibility	s/F	Only if the user uses the accessibility options on the website – change colour. Can be deleted by user during session.
	s/F	Only if the user uses the accessibility options on the website – font change colour. Can be deleted by user during session.
Google Analytics	p/P	Statistics on the website
Google reCAPTCHA v2 –	t/F	Used to secure forms on our site from spam and abuse by automated software.
WordPress	s/SN	WordPress – Used to check whether your web browser is set to allow, or reject cookies
	p/SN	WordPress – For users who log in only. On login, WordPress uses the wordpress_[hash] cookie to store your authentication details. Its use is limited to the admin console area, /wp-admin/.
	p/SN	WordPress – For users who log in only. After login, WordPress sets the wordpress_logged_in_[hash] cookie, which indicates when you're logged in, and who you are, for most interface use.
	p/SN	WordPress – For users who log in only. This is used to customize your view of the admin interface, and possibly also the main site interface. The number on the end is your individual user ID from the users database table.
Cookie consent	p/F	Used to record that you accept the fact that the site uses cookies.

The Alice Cross Centre has a Facebook feed on the website and if you are logged into Facebook while viewing the site then Facebook's cookie will allow you to, for example, like our Facebook page as you are logged in. To see Facebook's privacy policies visit: <https://www.facebook.com/help/325807937506242>

We use Google Analytics on our website. How Google uses the data when you use our website may be found at: <https://policies.google.com/privacy/partners>

You may disable the Google Analytics function by means of a browser add-on to ensure the prevention of the sending of any analytical information to Google. <http://tools.google.com/dlpage/gaoptout>  
Depending on the browser you are using to view the website you may also have cookies when looking at the website. For example, if you are using Chrome you may find you have other cookies via the browser. For more information see: <https://policies.google.com/technologies/types> . For more information on cookies in general: [www.aboutcookies.org](http://www.aboutcookies.org) and how to control cookies <https://www.aboutcookies.org/how-to-control-cookies/>

### **Twitter cookies**

The website has a twitter feed, Twitter uses cookies to collect information about which pages you view. To see Twitter's privacy policy visit: <https://twitter.com/en/privacy>

### **Log files**

The Alice Cross Centre website is currently being hosted by 1and1 webservices through Weatherheads Web (<https://about.1and1.co.uk/?linkId=ft.nav.about1and1>) .

Like most standard websites, 1&1 use log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyse trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. However, none of the information stored in the 1&1 log files, including but not limited to IP addresses, is linked to personally identifiable information.

### **Rights**

#### **Right to restrict processing**

Individuals have the right to request the restriction or suppression of their personal data held by The Alice cross Centre. They can make this request in writing or verbally.

The Alice Cross Centre will record the request has been made and will respond within one calendar month.

#### **Right to withdraw consent and erase personal information**

Individuals have the right to withdraw consent for The Alice Cross Centre to use their personal data and for it to be erased. They can make this request in writing or verbally.

The Alice Cross Centre will record the request has been made and will respond within one calendar month.

#### **What we do in the event of a personal information data breach**

When a personal data breach has occurred, if it not likely to pose a risk to the to people's rights and freedoms we will document the breach has happened and notify the individual. If there is a risk to a person's rights and freedoms we will notify the Information Commissioner's Office within 72 hours.

### **Legal disclaimer**

Though every effort is made to preserve your privacy, The Alice Cross Centre may need to disclose personal information when required to by law. If it is deemed necessary that such action needs to be taken, The Alice Cross Centre will comply with judicial proceedings should a court order or legal process be served on The Alice Cross Centre

## Right to complain

If you are unhappy with the way The Alice Cross Centre has processed your personal data you can complain to:

Information Commissioner's Office, Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF Tel: 03030123113 (local rate) or 01625 545 745 (national rate)

Email: [registration@ico.org.uk](mailto:registration@ico.org.uk)

## Contact information for The Alice Cross Centre

If you have any questions regarding The Alice Cross Centre and this policy please contact:

The Board of Trustees

Age Concern Teignmouth & Shaldon

The Alice Cross Community Centre

1-3 Bitton Park Rd

Teignmouth

TQ14 9BT



Signed on behalf of the Board of Trustees

Name: Sue Halfyard

Date: 28<sup>th</sup> March 2019