

## **Privacy Notice for service users and website visitors**

The Renewal Trust is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during your engagement with us, in accordance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA). This privacy notice covers and applies to The Renewal Trust and all its subsidiary companies and entities.

It applies to all service users, clients and website visitors.

The Renewal Trust (“the Trust” “We”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

### **Managing Our Clients’ Personal Data**

Under the UK GDPR and the Data Protection Act 2018, The Renewal Trust has responsibilities as a ‘Data Controller’, meaning that we are responsible for the collection, storage, use and disposal of any personal data that we process. Personal Data is data relating to a living individual who can be identified by that data, or from that data and any further information which is likely to come into the possession of the data controller.

We take our responsibility to our clients very seriously and this document sets out the approach we will adopt to ensure lawful, fair and transparent processing of data.

In order to fulfil our legitimate business activities in pursuit of our charitable objectives, we need to routinely collect data from our clients. The data we collect and retain for any period will normally be collected from our clients on the basis of legitimate interests under the UK GDPR. In instances where we rely on consent as the means of processing data, we will ensure that the consent given is fully informed so that you know the uses which we will make of your data.

Personal data will only be shared for a specific purpose related to the fulfilment of our obligations or where appropriate consent has been obtained from you.

The following information is designed to provide our clients with the requisite information regarding the collection, retention and analysis of their personal information and to provide reassurance that their information will be handled fairly and properly.

## **Information we (will) collect**

**Name and address** – We need this data in order to contact you in relation to the services you are accessing. The Renewal Trust is also particularly interested in your addresses as this helps us to monitor which parts of the Trust's operating area are engaging with our services and activities and, just as importantly, the parts of the local area that we're still not reaching.

**Your date of birth** – This helps us to identify you when we're looking through our records. It is also useful in terms of targeting our activities to specific age groups and in providing evidence to potential funders who might have restrictions on the age groups that they wish to fund.

**Your gender and your ethnic origin** – The Renewal Trust wishes to provide services and activities that benefit as many as people as possible and for this benefit to be felt by all local people equally. It is important to us to include all genders when we plan and deliver our activities and to be able to tailor our activities to include under-represented groups.

**Your email** – This is so that we can contact you by the easiest method for you. It also saves our resources and is better for the environment.

**Your telephone number** – If you would prefer us to contact you via the telephone, we are happy to do so. This is particularly useful in the event that we may need to contact someone in the event of an emergency.

**The activities led by The Renewal Trust that you have participated in** – One of the main reasons that we will be collecting data is to help us to keep track of how individual clients make use of our services and activities. We will look at whether people come to more than one type of activity, the location of the activities they attend, the dates and times that people tend to attend etc.

**What we will use this information for** – As previously mentioned, our ultimate aim when collecting and analysing the personal information is to be able to improve the planning and delivery of the services and activities that we and other organisations in Mapperley, Sneinton and St Ann's provide to both you and other community members. We want to reach as many people in Mapperley, Sneinton and St Ann's as possible and to provide the kind of activities that local people want to participate in.

## **Lawful basis for processing**

We mainly rely on legitimate interest as our lawful basis for processing your personal data for the main activities we provide. When we process special category of data and criminal records, the lawful basis is substantial public interest read with conditions from the Data Protection Legislation.

## **How we will manage your personal data**

**Electronic data** – Your information will be entered into a Customer Relationship Management software package. This is a password-protected storage system that helps us to analyse our clients / customers and to understand who we're reaching and who we haven't reached yet.

**Paper data** – Paper records of people’s personal details will be held on-site in secure and lockable filing cabinets.

**Who will see it** – The data processed by The Renewal Trust will not be shared with any third party organisations or individuals without the consent of the individual who is the subject of the data. Exceptions to this include the sharing of data where there is a legal obligation, for example to prevent a crime or to safeguard an individual and where required by law. Any reports produced as a result of the data analysis will be strictly anonymised to prevent the identification of individuals.

**How long will it be retained for** – (see: ‘Keeping Your Records Accurate and Up To Date’)

### **Data Protection**

The Renewal Trust is committed to data protection and will ensure the security and integrity of your personal information. We will maintain confidential files of accurate and relevant information and observe all relevant legislation, with particular reference to the UK GDPR and Data Protection Act.

Only those members of staff who will be working with our customers / service users on the planning, improvement and delivery of our services and activities will have access to your personal information. Any reports produced as a result of analysing your personal information will be carefully anonymised so as to prevent the identification of individuals. We have in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner’s Office of a suspected breach where we are legally required to do so.

Where we use third parties, including booking systems for booking activities, marketing automation platforms, for bulk email or postal communications we ensure that such suppliers are, as appropriate, fully certified and compliant with applicable privacy shield frameworks.

### **Your rights**

This Notice is intended to provide you with enough information to be able to decide whether or not you are happy for us to collect and retain your information. As a service user and/or website visitor, you acknowledge that we collect, retain and use your information (or your visual image), as outlined within this notice. You have the right to object to your data being processed in certain ways, which we have provided more information about below.

Under data protection laws in the UK and EU, you have certain rights over the personal information that we hold about you. If you would like to exercise your rights, please get in contact with any of the details listed above. Here is a summary of the rights we think apply:

#### **a. Right to be Informed**

You have the right to be informed as to how we use your data and under what lawful basis we carry out any processing. This Privacy Notice sets this information out however if you would like further information, please get in touch.

**b. Right of Erasure – also known as the right to be forgotten**

You may ask us to delete some or all of your information we hold about you. Sometimes where we have a legal obligation we cannot erase your personal data.

**c. Right to Object**

You have the right to object to processing where we are using your personal information such as where it is based on legitimate interests or for direct marketing.

**d. Inaccurate personal information corrected**

Inaccurate or incomplete information we hold about you can be corrected. The accuracy of your information is important to us and we are working on ways to make this easier for you to review and correct the information that we hold about you. If any of your information is out of date or if you are unsure of this, please get in touch through any of the contact details listed in this notice.

**e. Right of restriction**

You have a right to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we are not lawfully allowed to use it.

**f. Right to Access your information**

You have a right to request access to a copy of your personal information that we hold about you, along with the information on what personal information we use, why we use it, who we share it with, how long we keep it for and whenever it has been used for automated decision making. You can make a request for access free of charge and proof of identity is required.

**g. Automated decision making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right to question the outcome of automated decisions that may create legal effects or create a similar significant impact on you.

**h. Portability**

You can ask us to provide you or a third party with some of the personal information that we hold about you.

**i. Right to withdraw consent**

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data

**Seeing Your Records**

Under the Data Protection Act 2018, you have a right to see any records that we hold about you, both on paper and electronically (on computer). Should you wish to do this, please contact this address:

Chief Executive Officer  
The Renewal Trust  
27-31 Carlton Road  
Nottingham  
NG3 2DG

We will endeavour to respond to your request as soon as possible and at the latest within the period specified in law.

### **Keeping Your Records Accurate and Up To Date**

The personal information that we hold about our clients / customers will only be genuinely effective in helping us to improve services and activities if we are able to keep it accurate and relevant.

We are aware that information held for two years risks becoming out of date and loses its value. Therefore, while we would like to keep in touch with customers and clients in order to continually refresh the personal information we hold, we will also take measures to destroy older information at set times, usually every two years.

We retain the personal data of all service users for a period of in line with our retention periods. If you would like to know more about this, please contact us at the email address above.

### **Complaints Procedure**

If you are unhappy with the way we process your data, please get in touch by using one of the contact methods above. You can also make a complaint to the Information Commissioner's Office (ICO) which regulates the use of information in the UK. They can be contacted by at 0303 123 1113 or you can write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Changes to our Privacy Notice.

This privacy notice is kept under regular review. If we make any significant changes to the way in which we process your information, we will let you know by either reaching out to you or posting a banner on the website.