

Data Protection Policy for Sustainable St Albans

1 INTRODUCTION

Sustainable St Albans (“we”, “us”, or “our”) is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data are any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for several purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned or from a third party acting on behalf of an individual.

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

2 SECURITY

We take the security of all the data we hold seriously. Relevant personnel are made aware of their responsibilities for data protection, confidentiality and security prior to handling data.

We have policies and procedures which ensure we review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers and computers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

3 DATA THAT WE HOLD

3.1 SUPPORTERS AND MEMBERS

Sustainable St Albans is a charitable incorporated organisation, led by the community of St Albans and district. We invite supporters and members to share their personal data with us so that we can keep them informed about what we do and how they can play their part in the organisation and its activities. Supporters are individuals who have engaged with one or more of our programmes proactively. Members have completed a membership form to gain governance responsibilities to vote at Annual General Meetings.

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3.1.1 Why do we process data?

Where data are collected for Supporters and Members, it is used for a number of purposes, as follows:

- Providing services to you. For example, we send regular email newsletters about our work using your consent as the legal basis for processing your data. We will also collect data with reference to attendance at a particular event that you have registered for, so that we can inform you about the event and manage your attendance at it.
- Administration. We use our legitimate interests as a charity to keep a record of our members to keep them informed about our meetings and to ensure we know who can vote in annual general meetings.
- Playing Out. We also use our legitimate interests to communicate with individuals who wish to take part in our Playing Out programme. We also use our legitimate interests to share data about Playing Out participants with our Playing Out contractor, as a data processor, and with St Albans City & District Council, as a joint data controller of the data. Where we need to share data for legal purposes with partners, such as Hertfordshire Constabulary, which is responsible for managing traffic around closed roads, and Hertfordshire County Council, which is responsible for managing road closures (see section 5) we will do so.
- We use our legitimate interests to record details of people who have taken part in our activities, such as borrowing our thermal cameras, or hosting an open food garden. We also use this information to contact you about your participation in these activities.

3.1.2 What data are processed?

We keep the names, email addresses and if provided the home addresses of our members. We also record the same data about people who have taken part in our activities. In addition, we collect telephone numbers for individuals more closely involved in activities and programmes. We use video conferencing software to communicate with supporters using our thermal imaging cameras, and record their images for the purposes of their identification during the camera hire process. We also keep financial records of any supporters who have given a donation and do not wish to remain anonymous.

3.1.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected, after which we delete data including images. There may also be occasions which will require data to be kept for longer; however this will typically be for legal purposes, such as to record a Gift Aided donation.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it. We will periodically review this data, to ensure that it is still relevant and necessary.

3.2 OUR PEOPLE

We collect personal data for our people as part of the administration, management and promotion of our activities.

3.2.1 Trustees

We have a board of trustees to oversee the charity and provide good governance.

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The main purpose that trustees' personal data are collected is for administration and management, as well as for statutory reporting to the Charity Commission.

Personal data collected about trustees is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of one year where those purposes no longer become necessary. Personal data about trustees recorded on minutes or agendas will be kept as a record of the charity's activities, and will ultimately be archived in its records.

3.2.2 Volunteers

We have a number of volunteers who work on different SSA projects. We collect their contact data to enable us to inform them of the work of these projects and their role within them.

Personal data collected about volunteers will be held as long as necessary in order to fulfil the purpose for which it was collected, and for a maximum of one year where those purposes no longer become necessary.

3.3 SUPPLIERS

We collect and process personal data about our suppliers, sponsors, subcontractors, and individuals associated with them. The data are held to manage our relationship, to contract and receive services from them.

3.3.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our suppliers and their personnel as necessary to receive their services.
- Providing services to our event attendees and supporters. Where a supplier is helping us to deliver these services, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to those we are serving.
- Administering, managing and developing our services. We process personal data in order to run our charity, including:
 - managing our relationship with suppliers;
 - maintaining and using IT systems;
 - hosting, or facilitating the hosting, of events; and
 - administering and managing our website and systems and applications.
- Security, quality and risk management activities. We have security measures in place to protect meeting attendees' and supporters' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

3.3.2 What data do we hold?

We will hold suppliers' names, contact details, and in some circumstances their financial details.

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3.3.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights.

4 PEOPLE WHO USE OUR WEBSITE

When people visit our website, we do not collect personal data through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data are collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, subscribes to a service, or makes an enquiry. See section 3.1 for how we process this information.

5 SHARING PERSONAL DATA

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

- *Our suppliers and subcontractors*, where individuals working for them are conducting Sustainable St Albans business on our behalf. On such occasions, subcontractors are given access to use email addresses ending in @sustainablestalbans.org and also have access to relevant data files shared via the Cloud using password protected Google Drives or Dropbox folders. Suppliers and subcontractors always act as data processors, rather than data controllers.
- *Third party organisations that provide applications/functionality, data processing or IT services to us*. We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.
- *Third party organisations that otherwise assist us in providing goods, services or information, such as event facilitators*. This includes Friends of the Earth St Albans, which collaborates with Sustainable St Albans for our Sustainability Festival.
- *Law enforcement or regulatory agencies or those required by law or regulation*, such as passing contact details to St Albans City and District Council, Hertfordshire County Council and Hertfordshire Constabulary to manage the Playing Out.

It is possible that we could receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We

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will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

6 LOCATIONS OF PROCESSING

Where possible, personal data resides within the EU but may be transferred to, and stored at, a destination outside the European Economic Area (EEA). We do use IT applications to manage our email communications and where these companies are not based in the EEA, we ensure that they have taken sufficient security precautions, such as under the EU/US Privacy Shield.

7 INDIVIDUAL'S RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to info@sustainablestalbans.org.uk.

8 COMPLAINTS

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to info@sustainablestalbans.org.uk. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

9 DATA CONTROLLER AND CONTACT INFORMATION

The data controller for Sustainable St Albans is Dan Fletcher, one of our trustees.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at dan.fletcher@sustainablestalbans.org.uk.

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10 CHANGES TO OUR PRIVACY STATEMENT

Updates to this privacy statement will appear on this website. This privacy statement was last updated on 21/3/2021.