

PRIVACY POLICY

Introduction

Clachworks is fully committed to the compliance of the requirements of the General Data Protection Regulation (GRDP). Therefore, we will follow procedures that aim to ensure that all employees, volunteers and board members of Clachworks who have access to any personal data held by or on behalf of the company, are fully aware of and abide by their duties and responsibilities under this Act.

Statement of policy

In order to operate efficiently, Clachworks has to collect and use information about people who are or have been employees, volunteers, members, clients and customers. This personal information must be handled and dealt with properly however it is collected, recorded and used. Whether on paper or computer records there are safeguards to ensure this.

Clachworks regards the lawful and correct treatment of personal information as very important to its successful operations and day to day tasks.

Personal data is defined as data relating to a living individual who can be identified from:

- That data.
- That data and other information which is or may come into the possession of the data controller.

Sensitive personal data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious or other beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or convictions

Handling of personal/sensitive information

Clachworks will, through appropriate management and the use of strict criteria and controls:

- Observe fully conditions regarding the fair collection and use of personal information;
- Meet its legal obligations to specify the purpose for which information is used;
- Collect and process appropriate information to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- Determine the length of time information is held;
- Take appropriate security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards;
- Ensure that the rights of people about whom the information is held can be fully exercised under the Act.

Which include:

- The right to be informed – that’s an obligation on us to inform you how we use your personal data;
- The right of access – that’s a right to make what’s known as a ‘data subject access request’ for copy of the personal data we hold about you;
- The right to rectification – that’s a right to make us correct personal data about you that may be incomplete or inaccurate;
- The right to erasure – that’s also known as the ‘right to be forgotten’ where in certain circumstances you can ask us to delete the personal data we have about you (unless there’s an overriding legal reason we need to keep it);
- The right to restrict processing – that’s a right for you in certain circumstances to ask us to suspend processing personal data;
- The right to data portability – that’s a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);
- The right to object – that’s a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision making and profiling – that’s a right you have for us to be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them on the UK Information Commissioner’s Office website.

If you wish to exercise any of the rights set out above, please contact us at hello@clachworks.com.

You have the right to make a complaint at any time to the Information Commissioner’s Office (“ICO”), the UK supervisory authority for data protection issues (www.ico.org.uk).

Clachworks will ensure that:

- The Volunteer Coordinator has specific responsibility for data protection in Clachworks;
- Training and support is provided for staff and volunteers who handle personal data, so that they can act confidently and consistently;
- Everyone managing and handling personal information is appropriately supervised;
- Anyone wanting to make enquiries about handling personal information, whether a member of staff or a member of the public, knows what to do;
- Queries about handling personal information are promptly dealt with;
- Methods of handling personal information are regularly assessed and evaluated;
- Performance with handling personal information is regularly assessed and evaluated;

All Board Directors of Clachworks are to be made fully aware of this policy and of their duties and responsibilities under the Act.

All staff within the company will take steps to ensure that personal data is kept secure at all times against unauthorised access and will ensure that:

- paper files and other records or documents containing personal/sensitive data are kept in a secure environment;

and

- personal data held on computer systems are protected by the use of secure passwords.

Data Collection

The below table outlines what data we collect, how it is held, how we gathered the data, what our legal basis was for collection of the data, why this is necessary for us to perform our services and how it is possible to erase that data.

Data Category	What is held	Where came from	Who shared with	Legal Basis	Why necessary	Deletion
Sign-in sheets at events	Email address Name	Participants fill in sign-up sheet	Email addresses added to Tiny Letter to receive newsletter if consent given	Consent	To give participants option to join mailing list; to document attendee numbers and who waiting for	Shredded after event. Can be deleted from mailing list.
Newsletter	Email address Name	Participants subscribe online or on newsletter sign-up sheet	Tiny Letter	Consent	To send news to people who are interested in our activities.	Can be deleted from mailing list.
Eventbrite Tickets	Name Email Phone numbers Address (optional)	Participants fill in to attend workshops	Information held on Eventbrite	Performance of a contract with participant	To contact people if changes to workshop, to know who waiting for.	Contact Eventbrite at privacy@eventbrite.com

<p>Tool Library Membership</p>	<p>Name Email Address Phone DOB (optional) Gender (optional)</p>	<p>Members fill in to use the tool library (online)</p>	<p>Held on MyTurn</p>	<p>Performance of a contract with participant</p>	<p>To identify members when borrow items, to be able to retrieve items if not returned. Optional details not required but part of Myturn which is being improved.</p>	<p>Customer details can be anonymised</p>
<p>Borrower Agreements</p>	<p>Name Phone number Email</p>	<p>Members fill in to use the tool library (in person)</p>	<p>Held on MyTurn</p>	<p>Performance of a contract with participant</p>	<p>To identify members when borrowing items, to be able to retrieve items if not returned.</p>	<p>Contact details shredded. Agreement can be shredded on request if member would like to cancel membership. Details on Myturn can be anonymised.</p>