

STILL LEARNING PRIVACY POLICY

REVIEWED MAY 2019

INTRODUCTION

We are Still Learning CIC based at Sheffield Buddhist Centre, Howards Rd, Sheffield, S6 3RT.

We only collect and use personal information for legitimate legal reasons. This information is gathered to enable the CIC to run educational tours and workshops.

In addition, there may be a legal requirement to collect and use information to ensure that the centre complies with its statutory obligations.

This Privacy Policy sets out the basis on which we will process and use any personal data.

The purpose of this policy is intended to ensure that personal information is dealt with correctly and securely in accordance with the data Protection Act 1998 (DPA) and the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR). It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed and irrespective of whether it is held in paper files or electronically. All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

We comply with the DPA and GDPR in respect of the collection, holding, storage, use, and processing of personal data about our staff, clients and volunteers where necessary to fulfil our contractual or legal obligations.

PERSONAL DATA THAT WE MAY COLLECT

(a) We may collect and use the following types of personal data.

Name;

Address of organisation (not individual);

Phone numbers;

Email address;

3. HOW WE USE PERSONAL DATA

We process personal data as set out in this Privacy Policy for the following purposes:

- To enable us to deal with enquiries;
- To allow us to fulfil our pre-contract and contractual duties with you;
- To send relevant marketing material in line with your communications preferences;

- To enable us to comply with our legal and regulatory responsibilities

4. DATA PROTECTION PRINCIPLES

The Data Protection Act 1998 and the GDPR 2016 establishes eight enforceable principles that we adhere to, which are:

- Personal data will be processed fairly and lawfully;
- Personal data will be obtained only for one or more specified and lawful purposes;
- Personal data will be adequate, relevant and not excessive;
- Personal data will be accurate and where necessary, kept up to date;
- Personal data collected for any purpose shall not be kept for longer than is necessary to fulfil that purpose that it was collected for;
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and GDPR 2016;
- Personal data is secured by the appropriate degree of security;
- Personal data will not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

5. LEGAL BASIS FOR PROCESSING PERSONAL DATA

There are different lawful grounds that we rely on to use your personal information. We collect and use your personal information in the following situations:

- Where you have given us consent. We will rely on your consent to use your personal information for marketing purposes by phone, email or post.
- Where our use of your personal information is necessary to perform a contract or contracts that you are a party to, or to take steps that you request before entering into a contract.
- Where our use of your personal information is within our legitimate interests. For example, administrative purposes, identifying information, goods and services that are most likely to interest you as well as to detect, prevent, or otherwise address fraud, security, safety or privacy issues;
- Where we believe it is necessary to use your personal information to comply with a legal or regulatory obligation to which we are subject;

6. STORING AND HOLDING YOUR PERSONAL DATA

We do not retain personal information in an identifiable format for longer than is necessary.

- If we have provided goods and or services to you, we hold your personal information with relation to invoices for 7 years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims.
- Where we have obtained your personal information following a request made by you, for information on any of our goods or services, we hold your personal information for

24 months from the date we collect that information, unless during that period you enter into a contract with us.

The only exceptions to the periods mentioned above are where:

- The law requires us to hold your personal information for a longer period, or delete it sooner;
- Where you have raised a legal claim, complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law

7. INDIVIDUALS' RIGHTS

Individuals have certain rights in respect of the personal data that we hold about them.

To exercise any of the rights set out below, please contact us using the contact details set out in the "Contact and complaints" section of this Privacy Policy below:

- (a) Access. We will confirm to individuals whether or not we are processing and using personal data about them, at their request and, if so, provide them with access to and a copy of such personal data and the other details to which they are entitled.
- (b) Rectification. We will correct any inaccurate personal data and complete any incomplete personal data (including by providing a supplementary statement) that we hold about individuals without delay at their request.
- (c) Prevention of processing likely to cause damage or distress. We will respect our individuals' rights to require us to cease or not to begin processing their personal data for a specific purpose, or in a specific way, that is likely to cause unwarranted damage or distress, either to the relevant individual or a third party.
- (d) Erasure. We will erase personal data concerning an individual at their request without undue delay in certain circumstances, (for example, among other things, if their personal data is no longer needed for the purpose for which or was collected or otherwise used).
- (e) Restriction. We will restrict the processing of individuals' personal data in certain circumstances (for example, among other things, if they believe that their data held by us is inaccurate), if requested by them to do so.
- (f) Data portability. We will respect the rights of the individual to receive personal data about them that they have provided to us in a structured, commonly used and machine-readable format and to transmit such personal data to another data controller without hindrance from us in certain circumstances.

(g) Right to object. We will respect the general rights of individuals' to object to the processing of their personal data in certain circumstances.

(h) Right to object to marketing. We will respect individuals' rights regarding use of their personal data for direct marketing purposes. In particular, we will not begin or we will cease processing any personal data of individuals for direct marketing purposes if at any time individuals ask us not to do so.

8. CONTACT AND COMPLAINTS

If you wish to ask a question, exercise your rights or make a complaint you can contact us by email: still.learning.sbc@gmail.com

If individuals have any complaints regarding this Privacy Policy, they may also contact the UK Information Commissioner by telephone on 0303 123 1113 or at www.ico.org.uk