

# CAMBRIDGESHIRE ACRE GENERAL PRIVACY NOTICE

## Your personal data – what is it?

'Personal data' is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the 'GDPR') and other legislation relating to personal data and rights such as the Human Rights Act.

## Who are we?

This Privacy Notice is provided to you by Cambridgeshire ACRE which is the data controller for your data. Cambridgeshire ACRE is a registered charity (no 1074032) and company limited by guarantee (no 03690881). Our registered address is 72 Market Street, Ely, CB7 4LS.

## Cambridgeshire ACRE will comply with data protection law. This says that the personal data 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 and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

## What data do we process?

- Names (including aliases), titles, photographs;
- Contact details such as telephone numbers, addresses and email addresses;
- Financial identifiers such as bank account numbers and/or payment/transaction identifiers (where you make payments to us);

## How we use sensitive personal data

- We may process sensitive personal data, for example information about your physical or mental health or condition and/or your racial or ethnic origin or similar information, in order to comply with legal requirements and obligations to third parties.
- These types of data are described in the GDPR as 'Special categories of data' and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.
- We may process special categories of personal data in the following circumstances:
  - In limited circumstances, with your explicit written consent. If this applies, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.
  - Where we need to carry out our legal obligations.

### **What is the legal basis for processing your personal data?**

Cambridgeshire ACRE is a not-for-profit organisation with charitable objectives around working with partners, communities and individuals to develop Cambridgeshire and Peterborough as a vibrant place to live, work and visit.

We use your personal data for some or all of the following purposes:

- To deliver services to the County's rural communities, including to understand the need for our services; to understand what we can do for you and to inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g. Facebook, Twitter);
- To help us to build up a picture of how we are performing;
- To promote the interests of Cambridgeshire ACRE;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our projects, services, events and staff/trustees or other role holders;
- To send you communications which you have requested or that may be of interest to you. These may include information about campaigns and other new projects or initiatives;
- To process relevant financial transactions including grants and payments for services supplied to Cambridgeshire ACRE;
- To allow the statistical analysis of data so we can plan the provision of projects/services.

Most of your personal data is processed in compliance with the Legitimate Interests condition. This says that if we have a good reason to process your personal data then we may do so without your explicit consent so long as there is no unwarranted impact on you. Examples of this would be processing data for those involved in local councils or village halls where Cambridgeshire ACRE has a legitimate interest in making you aware of the services we provide to such bodies. Where we rely on the Legitimate Interests condition, we conduct balancing tests so we can be confident that our processing of your information has no detrimental impact on you. You have the right to object to us relying on this condition for processing your data. If you object then we will immediately stop processing your data on this basis.

Sometimes we may need to process your personal data for the performance of a contract with you, or to take steps to enter into a contract. Examples of this would be processing your data in relation to membership of Cambridgeshire ACRE, or in relation to contracts or agreements relating to particular projects, services or pieces of consultancy work.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

We will always take into account your interests and rights. This Privacy Notice sets out your rights and Cambridgeshire ACRE's obligations to you.

### **Sharing your personal data**

This section provides information about the third parties with whom Cambridgeshire ACRE may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. We may need to share your data with the following (but only where necessary):

- Local authorities, statutory agencies or not-for-profit bodies with whom we are carrying out joint work, e.g. in relation to events for the community.

- Contractors working on our behalf, e.g. if we should need to ask a commercial provider to distribute mailings on our behalf;

### **How long do we keep your personal data?**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 6 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our projects/services for an extended period of time. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

### **Your rights and your personal data**

You have the following rights with respect to your personal data:

*When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.*

1. **The right to access personal data we hold on you**
  - At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.
  - There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.
2. **The right to correct and update the personal data we hold on you**
  - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. **The right to have your personal data erased**
  - If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
  - When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).
4. **The right to object to processing of your personal data or to restrict it to certain purposes only**
  - You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.
5. **The right to data portability**
  - You have the right to request that we transfer some of your data to another controller, where processing is being carried out by automated means. Cambridgeshire ACRE does not conduct any automated processing and so you will not be able to exercise this right.

6. **The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**
  - Where we are relying on your giving express consent to us processing your data, you can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. **The right to lodge a complaint with the Information Commissioner's Office**
  - You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

### **Transfer of Data Abroad**

Cambridgeshire ACRE will not transfer your personal data to any country or territory outside the European Economic Area ('EEA').

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

### **Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on our website at <http://www.cambsacre.org.uk/contact-us.php>. This Notice was last updated on 21 March 2018.

### **Contact Details**

Please contact us if you have any questions about this Privacy Notice, the personal data we hold about you, to exercise all relevant rights, or for any queries or complaints at:

The Data Protection Officer, Cambridgeshire ACRE, 72 Market Street, Ely, CB7 4LS

Email: [enquiries@cambsacre.org.uk](mailto:enquiries@cambsacre.org.uk)

Phone: 01353 860850

If you have any concerns about our handling of your personal data, you can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.