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# Privacy Policy

Version	Changes
20180516	1 <sup>st</sup> release

## 1. Policy Statement

### Policy Statement

Please read this Privacy Policy carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This Policy applies to any website, application or service which references this Privacy Policy.

### About this Policy

Tadstock CIC takes the privacy of its customers very seriously and is committed to protecting personal information. This Privacy Policy sets out the way in which any personal information you may provide to us is used and kept secure by us. It applies whenever we collect your personal data (including when you use our website or other digital products), so please read it carefully. This policy does not apply to our employees who have a separate Privacy Policy of their own.

This policy does not form part of any Tadstock Employee's contract of employment and may be amended at any time.

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## 2. Definitions

### Information

Means information or data (including critical business information) which is stored electronically, on a computer or authorised device (such as company provided mobile phones, tablets or in-car system), or in paper-based filing systems / locations.

### Personal Data

Means any data relating to an identified or identifiable living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address, date of birth, identification number, location data), or it can be an opinion about that person, their actions and behaviour. Personal data that has been pseudonymised - e.g. key-coded - can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

### Sensitive Personal Data (Special Categories of Personal Data)

Means the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

### **Data Protection Legislation**

Means the General Data Protection Regulations (EU) 2016/679 ("GDPR"), unless and until GDPR is no longer directly applicable in the UK, the GDPR and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then any successor legislation to the GDPR or the Data Protection Act 1998.

## **Data Subjects**

Means all the identified or identifiable living individuals to whom the personal data relates. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

## **Data Subject Rights**

Means the Data Subjects rights to be informed of the data being held about them, have access to the data (known as a Subject Access Request), ability to be able to rectify the data, to be forgotten - have that data erased, to restrict processing of the data (the data can be stored but not processed), to be able to have the data transfer easily between IT environments (portability), to be able to object to certain processing aspects (such as marketing), as well as rights relating to automated decision making and profiling.

## **Processing**

Means any activity that involves the use of the data. It includes collection, recording, structuring or storage of the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Data to third parties.

## **Cookies**

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time. Most Internet browsers support cookies; however, users can set their browsers to decline certain types of cookies or specific cookies. Further, users can delete cookies at any time.

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## **3. About Tadstock CIC**

### **Who we are**

This Privacy Policy applies to all products and services offered by Tadstock CIC (a company incorporated in England with company registration number 10143875) whose registered office address is Kencot Hill Farm, Lechlade, GL7 3QY, UK.

### **If you have any questions**

If you have any questions about this privacy notice, please contact our Data Protection Officer (DPO) by email; [info@tadstock.org](mailto:info@tadstock.org).

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## 4. Information we collect

### What information do we collect and why?

We collect different information depending on what your relationship is with us, the services you use, or your contracts with us. We need to tell you what we use your information for and the legal grounds we have to use this information.

In broad terms, we use your data for the following purposes:

- to administer and provide products and services for our customers and to provide potential customers with information about products and services they have expressed an interest in
- to perform services that we are contracted to deliver
- for fraud screening and prevention purposes
- for record keeping purposes e.g. financial records
- to track your activity on our websites or portals
- where you have given us permission to do so i.e. you have opted in, for marketing purposes

When you interact with our websites or digital platforms, we may also automatically collect the following information about your visit. This is primarily to help us better understand how our website visitors use our digital platforms to inform our marketing, enable us to create a better user experience or content and create more relevant communications:

- how you have reached our website or digital platform and the IP (internet protocol) address used
- your browser type, versions and plug-ins, and your operating system
- your journey through our website, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information which may enhance user experience

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## 5. How we use your data

### Customers

What information is collected?	What is it used for?	What is the legal basis for collecting this information?
<ul style="list-style-type: none"><li>• Customer contact details</li></ul>	<ul style="list-style-type: none"><li>• To manage the account on a day to day, month to month basis.</li></ul>	<ul style="list-style-type: none"><li>• <b>Performance of a Contract.</b> To allow us to complete the performance of our contract with you, we require you to provide the stated information (or access to the information).</li><li>• <b>Marketing Consent.</b> Where the customer opts into marketing we will send them marketing information in accordance with the wording of the opt in statement that we believe will be of interest to the customer.</li></ul>

## Prospective Customers

What information is collected?	What is it used for?	What is the legal basis for collecting this information?
<ul style="list-style-type: none"> <li>Contact details provided by the prospective customer at the point and time of them making initial contact and making an enquiry. This might be in person, over the phone or via our website</li> </ul>	<ul style="list-style-type: none"> <li>To respond to the enquiry and provide any information required to fulfil the initial query and any subsequent queries.</li> </ul>	<ul style="list-style-type: none"> <li><b>Legitimate Interest.</b> It is in the legitimate interests of a person or organisation enquiry that we are able to contact them to provide them with the information necessary to satisfy their enquiry.</li> <li><b>Marketing Consent.</b> Where in the process of making an enquiry of that enquiry being fulfilled the prospective customer opts into marketing we will send them marketing information in accordance with the wording of the opt in statement that we believe will be of interest to the prospective customer.</li> </ul>

## Suppliers

What information is collected?	What is it used for?	What is the legal basis for collecting this information?
<ul style="list-style-type: none"> <li>Supplier contacts</li> <li>Invoicing details</li> <li>Service level agreements and capabilities.</li> </ul>	<ul style="list-style-type: none"> <li>To be able to place work with and direct work to the supplier, to enable us to meet our contractual obligations with customers and provide the best possible service and experience.</li> <li>To be able to pay for services delivered by the supplier.</li> </ul>	<ul style="list-style-type: none"> <li><b>Performance of a Contract.</b> To allow us to complete the performance of our contract with our customer we require the supplier to provide the stated information (or access to the information).</li> </ul>

## Monitoring

We may monitor or record telephone calls for training and evidence purposes and to improve the quality of services that we provide to you.

## Additional Information

We may collect additional information as we develop new systems and services. This policy will be updated with the details if this is the case as outlined in section 11 of this policy.

## 6. Cookies

### What cookies we use

We primarily use cookies on our website known as performance cookies, as well as authorisation cookies for our systems.

#### Authorisation cookies

What personal information is collected?	What is it used for?	Further Information
<ul style="list-style-type: none"> <li>No personal data is collected only a session ID and token</li> </ul>	<ul style="list-style-type: none"> <li>It is used as a session identifier to verify user credentials</li> </ul>	<ul style="list-style-type: none"> <li>Session cookies - the information is only gathered for that session</li> <li>They are encrypted (standard .Net) and only accessible by the application they are used for</li> </ul>

## Performance cookies

Cookie Type	What personal information is collected?	What is it used for?	Further Information
Google Analytics	<ul style="list-style-type: none"><li>No personal data is collected</li></ul>	<ul style="list-style-type: none"><li>To collect anonymous information about how visitors use our websites</li><li>We use the information to compile analytical reports which help us improve our website</li><li>The cookies collect information such as the number of visitors to our website, how they arrived there (e.g. directly from the internet or through linking from another website) and tracking which webpages they visited.</li></ul>	<ul style="list-style-type: none"><li>Persistent cookies</li><li>Examples of such cookie names are: _utma _ga</li><li>Google privacy details can be found <a href="#">here</a></li></ul>
YouTube	<ul style="list-style-type: none"><li>IP address and location</li></ul>	<ul style="list-style-type: none"><li>We may embed YouTube videos onto our websites, YouTube will then track your usage of the video, how long you watch it for, your IP address and location.</li></ul>	<ul style="list-style-type: none"><li>Session cookies - We do not retain or use this information</li><li>YouTube privacy details can be found <a href="#">here</a></li></ul>
Google Maps	<ul style="list-style-type: none"><li>IP address and location</li></ul>	<ul style="list-style-type: none"><li>Some of our systems may have a google maps option</li><li>Google may then track your usage of maps, your IP address and location</li></ul>	<ul style="list-style-type: none"><li>Session cookies - We do not retain or use this information</li><li>Google privacy details can be found <a href="#">here</a></li></ul>

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## 7. Sharing Your Information

### Who we share your data with

To provide our products and services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf.

These may include for example, event management companies, security companies. They only use the information to provide their services to us.

We only give them the information that they need. We always keep control of your data and our suppliers must act in accordance with our instructions.

In some circumstances, we may also have to disclose your personal information by law, because a court or the police or other law enforcement agency has requested it.

Where you opt-in to receive Marketing information from us we will not share this information with third parties, except where they are integral to the process of creating or sending the marketing material.

## Criteria for sharing your data

We only share your data with third parties if:

- They have a need to know the information for the purposes of providing the contracted services;
- Sharing your Personal Data complies with this Privacy Policy and, if required, the Data Subject's consent has been obtained;
- The third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- The transfer complies with any applicable cross border transfer restrictions; and
- Where an appropriate written contract or agreement that contains data protection clauses has been agreed

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## 8. Record Keeping

### How we record the data we hold

We are required to keep full and accurate records of all our data Processing activities; including records of Data Subjects' consents and procedures for obtaining consents.

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## 9. We only hold Your Choices and Obligations

### How long we keep your data for

We only hold your personal information for as long as is necessary to provide services to you unless there is a requirement to hold that information for a longer period - for example where we are subject to a statutory obligation to keep hold of your information e.g. financial records.

To be able to fulfil our contractual obligations with our customers we typically retain any necessary data to meet these obligations for the duration of the contract (plus an additional 6 months to fulfil contract survival clauses or for legal obligations such as for fine management).

If there is a possibility that you may have a legal claim against us or you have made a complaint against us, then we will hold your information for the duration of any statutory limitation period associated with the claim.

Where you opt in to receive Marketing material, this will apply for a period of four years before we are required to ask you again. You can of course ask to unsubscribe at any time. All our Marketing emails have an unsubscribe option clearly visible and you can also unsubscribe at any time by emailing us [info@tadstock.org](mailto:info@tadstock.org).

### Security of your data

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure we have put in place robust physical, electronic and managerial procedures to safeguard and secure the information we collect, including for example data encryption and electronic password protection.

If at any point you become aware of a security incident or you have reason to suspect that your data may have been compromised (e.g. you receive a suspicious communication about you or your vehicle), please forward the communication to us or report the incident by email to [info@tadstock.org](mailto:info@tadstock.org)

If you have been the victim of a fraudulent transaction whether or not this relates to your dealings with us you should always contact the police and/or your bank in the first instance to ensure your own finances are secure.



## More about your information - your rights

You may request a correction or update your personal information at any time by emailing [info@tadstock.org](mailto:info@tadstock.org)

Please include your name, address and email address when you contact us as this helps us to ensure that we accept amendments only from the correct person and can contact you to verify your identity should this be necessary. We encourage you to promptly update your personal information if it changes and we will action these as quickly as we reasonably can.

We will securely retain your information for as long as is reasonably necessary and in accordance with law applicable at the time. If you wish to submit a request that your data be deleted, please email us using [info@tadstock.org](mailto:info@tadstock.org)

You have the right to receive a copy of the personal information that we hold about you. Please email us using [info@tadstock.org](mailto:info@tadstock.org) if you wish to exercise this right.

If you have opted in to receive marketing from us, you can unsubscribe here at any time.

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## 10. Complaints

### Complaints to the Regulator

If you do not think that we have processed your data in accordance with this notice, please contact us by email at [info@tadstock.org](mailto:info@tadstock.org)

If you are not satisfied with our response, you can refer the matter to the Information Commissioner's Office. Information about how to do this is available on their website at [www.ico.org.uk](http://www.ico.org.uk).

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## 11. Changes to this Policy

### Notification of Changes

We reserve the right to change this policy at any time. Where appropriate, we will notify Data Subjects of those changes in writing (letter or email).

Any changes will be detailed on the document control sheet accompanying this policy and will be version controlled. These changes will be submitted to our management for approval and sign off.