

Look! St Albans Privacy Policy

1 INTRODUCTION

Look! 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 is 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 trained on data protection, confidentiality and security.

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

Look! St Albans is a community organisation, led by the community of St Albans and district. We invite supporters 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.

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3.1.1 Why do we process data?

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

- Providing services to you. We send regular email newsletters about our work using your consent as the legal basis to process your data.
- Administration. We keep a record of those that we engage with in order to inform funders and other organisations who need to know about our reach into the local community using our legitimate interests as a community organisation.

3.1.2 What data is processed?

We only keep names and email address data of our supporters. We also record if they have attended any of our events or design charrettes. 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, there may also be occasions which will require data to be kept for longer, however this will typically be for legal purposes.

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 CHARRETTE ATTENDEES

Look! St Albans holds design charrettes to provide an opportunity for developers, St Albans and district residents and facilitators to discuss and plan new developments.

3.2.1 Why do we process data?

Where data is collected about Charrette attendees, it is used for a number of purposes under our legitimate interests as a community organisation, as follows:

- Providing services to you. We ask charrette attendees to register so that we can inform them about any changes to the event plans and send them updates about the Charrette outcomes.
- Administration. We keep a record of those that attending a Charrette to demonstrate to developers, funders and other organisations that the Charrette has involved residents of the district.

3.2.2 What data is processed?

We ask for names, postcode, email address and organisation (if relevant) for Charrette attendees. We also record if they have attended any of our events or design charrettes.

3.2.3 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, there may also be occasions which will require data to be kept for longer, however this will typically be for legal purposes.

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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.

3.3 OUR PEOPLE

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

3.3.1 Representatives Group

We have a Group of representatives who inform Look! St Albans and contribute to its activities. An officers group is elected from the Group.

The main purpose that personal data for Representative Group members are collected is for administration and management to keep track of Group members and to keep them informed about their responsibilities.

Personal data collected for Representative Group members 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.

3.4 SUPPLIERS

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

3.4.1 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 our clients.
- Administering, managing and developing our services. We process personal data in order to run our organisation, 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 charrette 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

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personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

3.4.2 What data do we hold?

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

3.4.3 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 is 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. See section 3.1 and 3.2 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:

- *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 charrette facilitators*
- *Law enforcement or regulatory agencies or those required by law or regulations*

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

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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 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 lookstalbans@gmail.com.

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 lookstalbans@gmail.com. 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 Look! St Albans is Dan Fletcher, one of the Representative Group members

If you have any questions about this privacy statement or how and why we process personal data, please contact us at lookstalbans@gmail.com

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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 25/05/2018.