

# The Great Collaboration The Place-Based Initiative Ltd

(a Company Ltd by Guarantee)



# **Privacy Policy**

14/12/2023

This Policy is authorised by the PBI Directors.

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# **Privacy Policy**

#### The Place-Based Initiative Ltd (PBI) Privacy Policy

This privacy policy tells you what to expect us to do with your personal information when you contact us, sign up to The Great Collaboration or use one of our services.

# 1) General Information

We'll tell you:

How we collect your information
What purpose we are processing it for
Whether there are other recipients of your personal information
Whether we intend to transfer it to another country, and
Whether we do automated decision-making or profiling.

# 2) Contact information

The Place-Based Initiative Ltd (PBI) is the controller for the personal information we process, unless otherwise stated.

You can contact us by email, and post.

Our postal address: 17 High Street, Mitcheldean, England, GL17 0AT

Our email address: admin@placebasedinitiative.co.uk

You can contact us at **admin@placebasedinitiative.co.uk** or via our postal address. Please mark the envelope, or use the subject line: 'Data Protection Officer'.



# 3) How do we get information?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

You are employed by The Place-Based Initiative Ltd (PBI).

You are a user of our service The Great Collaboration and have signed up.

You subscribe to our e-newsletter.

You wish to attend, or have attended, an event.

You have applied to volunteer with us.

You may have donated, or expressed an interest in donating, to support saving our planet.

We also receive personal information indirectly, in the following scenarios:

A volunteer of ours gives your contact details as an emergency contact or a referee.

# 4) What purpose are we processing it for?

We will process your data for the purpose of:

Communicating in relation to ongoing activity relating to The Great Collaboration; and associated correspondence

Facilitating Council & Community Climate Action activity in local, regional and national groups; including training

Keeping in touch with relevant news and related correspondence

Promoting, or managing events

Volunteer related matters

Other legitimate interests (for example: including, but limited to, emergency contact numbers or references)

# 5) Your Data Protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.



#### Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. You can read more about this on the ICO website here.

#### Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can read more about this on the ICO website here.

# Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. <u>You can read more about this on the ICO website here.</u>

#### Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this on the ICO website here.

#### Your right to object to processing

You have the right to object to processing, if we are able to process your information because the process forms part of our legitimate interests. <u>You can read more about this on the ICO website here</u>.

# Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under a contract, or in talks about entering into a contract and the processing is automated. You can read more about this on the ICO website here.

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

Please contact us at admin@placebasedinitiative.co.uk if you wish to make a request.



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# 6) Sharing your information

We will not share your information with any third parties for the purposes of direct marketing.

We use data processors who are third parties who provide elements of services for us.

The ICO defines a "processor" as: "data processor", in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

"Processing", in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organisation, adaptation or alteration of the information or data,
- retrieval, consultation or use of the information or data,
- disclosure of the information or data by transmission, dissemination or otherwise making available, or
- alignment, combination, blocking, erasure or destruction of the information or data

Don't worry, this isn't as onerous as it sounds, but it covers the fact that we store your data in a database, which volunteers may access and use software like Mailchimp to email you.

We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Where we contract with third parties for the processing of your data, these may be located outside the UK (in the EU or in the USA). When this is the case, we ensure the contracts we have in place with those third parties meet the requirements of the GDPR.

In some circumstances we are legally obliged to share information. For example, under a court order (where we have considered we have a lawful basis on which to share the information and document our decision making).



#### 7) Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

#### 8) Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at dataprotection@greatcollaboration.uk and we'll respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the ICO as the UK supervisory authority. Please follow this link to see how to do that.

#### 9) Changes to this Privacy Policy

We keep our privacy policy under regular review to make sure it is up to date and accurate.

#### 10) Visitors to our website

#### **Analytics**

When you visit <a href="https://greatcollaboration.uk/">https://greatcollaboration.uk/</a>, we use third-party services, including Google Analytics, to collect standard internet log information and details of behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

# **Cookies**

We use a cookies tool on our website which relies on implied consent of users. In recognition of the fact that the implementation date for the revised e-Privacy Regulation remains unknown, we are taking reasonable steps now to align our use of cookies to the standard of consent required by GDPR.



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By default, our cookie tool requires explicit opt in action by users of our website. This will apply to the non-necessary cookies. We will ensure any necessary cookies for functionality and security are not deleted.

#### Search engine

Search queries and results on our website are logged anonymously to help us improve our website and search functionality. No identifiable personal information is collected by us.

# Purpose and legal basis for processing

The purpose for implementing the above is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users. The legal basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests.

#### What are your rights?

As we are processing your personal data for our legitimate interests as stated above, you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the ICO website: 'Your rights as an individual'.

# 11) Automated decision-making or profiling

We do not use automated decision making. We may occasionally profile your data for the purpose of recruiting members to The Great Collaboration..

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