

# Organisational and Website Privacy Policy

Transition Wilmslow

*Policy version: January 2024*

## **Overview**

Your privacy is very important to us and we take care to hold your personal information securely and in accordance with the Data Protection Act and the UK General Data Protection Regulation. We only use your information in a manner consistent with the purposes for which you have provided it to us, as set out below.

## **Who are we?**

Transition Wilmslow ('we', 'our' or 'us') is the controller of personal data collected and processed in accordance with this policy, meaning that we are the organisation legally responsible for deciding how it is used and for what purposes. We are a registered charity (number 1201884) with the Charity Commission of England and Wales. Our details are accessible on the [Charity Commission's Register](#).

## **About this Privacy Policy**

This Privacy Policy tells you what to expect us to do with your personal information when you contact us, sign up for membership or for our newsletter, attend one of our events or use one of our services.

Please read this policy carefully, as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your personal data). It also explains your rights in relation to your personal data and how to contact us or a regulator in the event you have a complaint.

## **What personal data do we collect and process?**

We collect and process various types of personal data depending on your relationship with Transition Wilmslow. We may collect and process personal data relating to the following people:

- Members
- Trustees
- Volunteers
- Contractors or Consultants

- Supporters and Donors
- Website users, including individuals who sign up to our mailing list
- Users of our services, for example the Repair Cafe or attendees at one of our training events.

The types of personal data we may process, for the purposes described below, include:

- Name
- Email address
- Home address
- Phone number
- Biographical information
- Age
- Nationality
- Immigration status
- Employment and employer status
- Financial information (including donation history and details about your taxpayer status when claiming Gift Aid)
- Communication preferences (primarily through our mailing list)
- IP addresses
- Pages accessed on our website
- Cookie session data (as described further in our Cookies Policy).

Generally, we do not collect or keep a record of sensitive personal data and only do so in very limited circumstances, primarily when you have chosen to provide us with this data.

We process some sensitive personal data, for example, about Transition Wilmslow's volunteers as far as necessary to fulfil our duties towards you. On occasion we may also process sensitive personal data of others engaging with Transition Wilmslow, for example where an individual provides us with information relating to health and accessibility needs for the purposes of attending one of our organised outdoor events, or where an individual contacts Transition Wilmslow and their communication includes sensitive personal data. We do not use this data for any other purpose other than that for which it is provided.

### **Why we collect and process personal data**

We collect and process personal data for the following necessary purposes:

- To administer our website;
- To respond to any communications, queries, or requests for information or services from you, however received;
- For organising and managing campaigns, events and activities in connection with our mission and charitable objectives, which are described on the Charity Commission website.

- To receive and process financial donations;
- For auditing purposes;
- For procurement of services; and
- To understand our supporters' and donors' engagement with us and our campaigns;
- To comply with our legal or regulatory obligations.

We also collect and process data when you communicate with us through various means. Communications from the public or our supporters via our website's 'contact us' form or by direct email to [transitionwilmslow@gmail.com](mailto:transitionwilmslow@gmail.com) are received by email and are reviewed by Transition Wilmslow volunteers, and sent onwards when necessary to other volunteers. Information we receive by post is collected and reviewed by our volunteers and may be shared as necessary with other volunteers.

Transition Wilmslow will only process personal data when we have a legal basis for doing so. The legal basis that we will rely on will depend on the circumstances in which we collect and use your personal data. In almost all cases, the relevant legal basis to process personal data is that the processing will be one of the following:

- Based on your consent to use your data in a certain way (for example, to communicate with you through our mailing list). Your consent may subsequently be withdrawn at any time by contacting us as specified in the How to Contact Us section of this Policy, without affecting the lawfulness of processing based on consent before its withdrawal.
- Necessary in order to take steps prior to entering into a contract or for the performance of a contract (for example, for providing you with any services you have requested or to allow you to participate in an event we have organised, and to manage those carrying out work on behalf of Transition Wilmslow, including any volunteers);
- Necessary to comply with legal requirements (for example, to comply with applicable regulatory obligations); and
- Necessary for our legitimate interests (for example, to administer our websites, to manage our donations, to carry out research consistent with our mission and to manage volunteers). We will only rely on this legal basis where we have identified the purpose (the legitimate interest), assessed that the processing is necessary for that purpose and conducted a balancing test to ensure that this interest is not overridden by the interests, rights and freedoms of the individual.

### **How do we protect personal data?**

Personal data shall be subject to additional safeguards to ensure this data is processed securely. For example, access to your data will be strictly limited to a minimum number of individuals and subject to confidentiality commitments.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy. 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 any of our websites; any transmission is at your own risk. Once we have received your information, we will use security features to try to prevent unauthorised access. When possible, encryption is used, both in transit and storage. Access controls within Transition Wilmslow limit who may access information.

We never transfer your data outside of the United Kingdom ("UK") or European Economic Area ("EEA") unless we have your explicit consent for it, or on the basis of specific safeguards in individual circumstances of which we'll let you know if they apply to your data.

### **Who do we share personal data with?**

At Transition Wilmslow, we administer, run, and use a series of services and infrastructure that may process your personal data.

As necessary in connection with the above purposes, your personal data may be transferred to Transition Wilmslow volunteers, to our Board of Trustees, to the Charity Commission as our regulator or to our authorised third-party service providers and partners. We select and review authorised third parties when possible and review their privacy and security policies. These authorised third parties may be engaged in, among other things, the processing of donations, technology support, outreach campaigns, or research projects carried out in connection with our mission.

We will always treat your personal data with the utmost respect and never share it with other organisations for marketing purposes.

Some of these personnel and authorised third parties (for example payment processors or technology partners, in particular Google Drive) may transfer data outside the UK or European Union ("EU"). We take appropriate steps to ensure that data remains within jurisdictions with adequate protections for personal data and ensure that recipients of personal data from us are bound to duties of confidentiality, where relevant or appropriate. Where this is not possible, we rely on data minimisation, and as much as possible, the selection of trusted companies with privacy policies and auditable processes which we have reviewed, and seek to ensure that there are adequate safeguards in place for protecting transferred data, for example Standard Contractual Clauses. For more information on the safeguards for transfer in a particular operation please contact us. We may also be required to disclose or otherwise process your personal data in the context of a regulatory audit to which we may be subject from time to time.

These services may include:

- Internet resources we administer and control but are hosted by third parties, e.g. our website ([www.transitionwilmslow.co.uk](http://www.transitionwilmslow.co.uk) and our hosting service). These are hosted by providers who will have log data and with whom we have data processing agreements under which they act as processors for us.

- Internet resources we do not control where we have accounts operated by third parties, e.g. Google Drive, email, social media, third party content providers (search engines, podcasts, video), surveys, payment processors, calendaring, conferencing services. These third parties have privacy policies in place that govern how users' data are used.
- Services where our member, volunteer and trustees' data may be processed, including external services that we administer and control with a third party host; services we administer but are hosted in the cloud; services where we are administrative users but do not control (e.g. email, calendaring), and services where we are users (e.g. email). These are governed as described above based on agreements and/or policies.

### **How Long Do We Keep Personal Data?**

We ensure that personal data is retained only for as long as necessary in accordance with the above purposes and applicable laws. We retain personal data for the following indicative periods:

- Donations data: 4-5 years following the end of the fiscal year in which the donation was made
- Volunteer data (provided to any of our Groups): until you ask us to delete your data or otherwise withdraw consent
- Communications of members of the public with Transition Wilmslow: 12 months from last correspondence

### **Website Privacy Policy**

As with most websites, our website maintains a log of activity. Your IP address will be recorded, along with other information which may or may not be supplied by your browser. This includes the address of the site that referred you to the website, the type and version of the browser you are using, the operating system you use, and the screen resolution at which you viewed the site.

This information is used solely to help us improve our delivery of the services on our website. This information is collected under the lawful basis of legitimate interests.

Sometimes you can choose if you want to give us your personal data and let us use it. If so, we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on your use of our website or any services on it.

## **Our database**

We store personal and organisational details that we collect through the website and through our interactions in carrying out our services. We hold this data and process this for the legitimate interests of Transition Wilmslow.

We need to process this data as part of the delivery of our service to enable us to monitor the activities that we are undertaking, to improve our services, achieve our charitable objectives and report to funders.

## **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.

## **Cookies**

When you visit our website, the pages you view, along with small text files called 'cookies', are downloaded onto your computer.

Each time you visit the website your computer will download a session cookie. This cookie only remains on your computer until you close your browser. This cookie is not used to identify you personally in any way. We use session cookies to compile anonymous, aggregated statistics that allow us to understand how visitors use the site. This information helps us improve the sites structure and functionality.

Your computer will also download a persistent cookie when you first visit the site. These remain in your browser's cookie store between browsing sessions. Persistent cookies allow us to recognise repeat visitors to the site. Persistent cookies are also used to allow registered users to use the site without logging in on every visit.

You may opt to view the site without cookies by adjusting your browser's settings. See your browser's 'Help' menu for information on how to do this. If you disable cookies some functions of the site may no longer work correctly.

## **Your rights**

You have rights under data protection law over your personal data.

You are entitled to request access to, rectification of, or erasure of your personal data. You are also entitled to request restriction of collection and/or processing of, or object to certain types of collection and/or processing of your personal data. You have the right to ask us not to collect and/or process your personal data for marketing purposes; we currently require your consent by

opting-in, and you can change your preferences at any time. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You may also, in some circumstances, have a right to data portability.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below). You may also find it helpful to refer to the guidance from the UK's Information Commissioner on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, call or write to us—see below: 'How to contact us'. When contacting us please:

- provide enough information to identify yourself (eg your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

We will provide you with a response to your requests in accordance with UK data protection law. Requests can be submitted at any time by email to [transitionwilmslow@gmail.com](mailto:transitionwilmslow@gmail.com), or by post to the physical address set out below. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) as the UK supervisory authority. The ICO's contact details are: <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **Changes to this privacy policy**

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

## **How to contact us**

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Email: [transitionwilmslow@gmail.com](mailto:transitionwilmslow@gmail.com)

## **Do you need extra help?**

If you would like this policy in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).

## **Revision Information**

Version 1 of this privacy policy was created in October 2023.

Further details about any future updates will be published here.