

**Privacy Notice – BUILDING RESILIENT BUSINESSES**

**BACKGROUND:**

Going Green for a Living Community Land Trust Ltd trading as Open Newtown understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our participants and volunteers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

The Building Resilient Businesses project is being supported by the Welsh Government Rural Communities - Rural Development Programme 2014-2020, which is funded by the European Agricultural Fund for Rural Development and the Welsh Government. Open Newtown is project managing the workstream Building Resilient Businesses as part of the ENRaW Project. Building Resilient Businesses is being delivered by Circular Economy Mid Wales, Robert Owen Community Banking Fund.

1. Information About Us.

Going Green for a Living Community Land Trust Ltd trading as Open Newtown

Limited Company registered in England under company number 10976887.

Address: Top floor no 9 Board Street Newtown Powys SY16 2LU.

Main trading address:AsAbove.

VAT number: 294751271.

Data Protection Officer: Sabrina Cadman.

Email address: sabrina@opennewtown.org.uk .

Telephone number: 01686 610777

Postal address: Same as above.

Our representatives on the Building Resilient Businesses Project:

1. Circular Economy Mid Wales a company registered in England and Wales under number 10976887 whose registered office is at 9 Board Street Newtown Powys SY16 2LU and
2. Ponthafren Association a company registered in England and Wales under number 1035326 whose registered office is at Ponthafren Association Longbridge Street Newtown SY16 2DY and
3. Robert Owen Community Banking Fund a company registered in England and Wales whose registered office is at 3rd Floor, Royal Welsh Warehouse Pryce Jones Building 17 Old Kerry Road Newtown Powys SY16 1BH
4. Impact Consultancy and Research, The Folly, Fownhope, Hereford HR1 4QA

We are regulated by Information Commissioners Office

1. What Does This Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

1. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

1. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

* + - 1. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
      2. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
      3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact ususing the details in Part 11 to find out more.
      4. The right to be forgotten, i.e. the right to ask ust o delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
      5. The right to restrict (i.e. prevent) the processing of your personal data.
      6. The right to object to us using your personal data for a particular purpose or purposes.
      7. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
      8. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
      9. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed if we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about ouruse of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

1. What Personal Data Do You Collect and How?

We may collect and hold some or all the personal and non-personal data set out in the table below, using the methods also set out in the table. Wedo collect‘special category’ or ‘sensitive’ personal data. We do not collectpersonal data relating to childrenORdata relating to criminal convictions and/or offences**.**

|  |  |
| --- | --- |
| **Data Collected** | **How we collect the Data** |
| Personal Details: Name Age, Gender, Ethnicity, Dietary Requirements | Paper or electronically |
| Special Category Personal Data | Paper or electronically |
| Contact Details: Postal Address, email address and telephone numbers. | Paper or electronically |

1. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how wemay use your personal data, and ourlawful bases for doing so:

|  |  |  |
| --- | --- | --- |
| **What We Do** | **What Data we Use** | **Our Lawful Basis** |
| Provide support and advice  Run Workshops /Events | Personal Details: Name and contact details: address, telephone, email.  Dietary and Access Requirements | Your consent so that we can contact you to discuss support/advice and workshops/events and to inform you if a workshop/event has been altered or cancelled.  To ensure that any special requirements (dietary, health, disability) are known and adjustments made. |
| Communicate with you and  supply you with information | Personal Details: Name and contact details: address, telephone, email. | Your consent so that we can inform you about new workshops/events offered by our representatives. |
| Project evaluation data | Personal and special category data plus completed evaluations (anonymised) | Your consent to use your data to evaluate the project and to provide information required by our funder.  Legitimate Interest to ensure equality of opportunity and treatment. |

With your permission and/or were permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email**,** telephon**e and** post with information, news, and offers on ourservices. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with ourobligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always can opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

1. How Long Will You Keep My Personal Data?

Wewill not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

|  |  |
| --- | --- |
| **Type of Data** | **How Long we will keep your data** |
| Personal Data – Name, address, other contact details including telephone number and email address | * Until June 2023 when project ends. Subjects can have their data removed on request. * Anonymised data will be retained for 7 years following funding guidelines set by the Welsh Government |
| Special Category Data: age, disability, religion, sexual orientation ethnicity, gender, medical health needs, dietary requirements | * Until June 2023 when project ends. Subjects can have their data removed on request. * Anonymised data will be retained for 7 years following funding guidelines set by the Welsh Government |
| Evaluation Data: evaluation/feedback forms and other evaluation tools, workshops attended, support received | * Until June 2023 when project ends. Subjects can have their data removed on request. * Anonymised data will be retained for 7 years following funding guidelines set by the Welsh Government |

1. How and Where Do You Store or Transfer My Personal Data?

Wewill only store your personal datain the UK. This means that it will be fully protected under the Data Protection Legislation.

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the [Information Commissioner’s Office](https://ico.org.uk/).

The security of your personal data is essential to us**,** and to protect your data, we take several important measures, including the following:

* limiting access to your personal data to those employees, representatives, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
* procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we arelegally required to do so;
* Shredding of any paper-based forms after 36 months.
* Secure IT systems in places ref data collection.

1. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of ourbusiness may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Wemay share your personal data with other partners in the ENRaW project for completion of our Projects and to provide the necessary data required by our funder, the Welsh Government. Wherever possible data being used will be anonymised.

We contract with the following representatives (third party) to supply services under the ENRaW Project.

|  |  |  |  |
| --- | --- | --- | --- |
| **Representative** | **Activity Carried Out** | **Sector** | **Location** |
| Circular Economy Mid Wales | Provide advice and support  Run workshops  Events  Activities | Third Sector | 9 Board Street Newtown Powys SY16 2LU |
| Ponthafren Association | Provide advice and support  Run workshops  Events  Activities | Third Sector | Longbridge Street Newtown SY16 2DY |
| Robert Owen Community Banking Fund | Provide advice and support  Run workshops  Events  Activities | Third Sector | Royal Welsh Warehouse Pryce Jones Building 17 Old Kerry Road Newtown Powys SY16 1BH |
| Impact Consultancy | Full Project Evaluation | Private | The Folly, Fownhope, Hereford HR1 4QA |

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 8.

If we sell, transfer, or merge parts of ourbusiness or assets, your personal data may be transferred to a third party. Any new owner of ourbusiness may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we areinvolved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

1. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within **28 days** and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of ourprogress.

1. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of **Sabrina Cadman:**

Email address: sabrina@opennewtown.org.uk

Telephone number: 01686 610777

Postal Address: To floor no 9 Board Street Newtown Powys SY16 2LU

1. Changes to this Privacy Notice

Wemay change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change ourbusiness in a way that affects personal data protection.

Any changes will be made available via above the main address.

This Privacy Notice was last updated on 5th January 2022

 