



GDPR and Privacy Policy

SWPride will revise and review this policy regularly.

Version:5.0

Next Review date: January 2024

Version	Date	Changes	Changed by
0.1	09/06/2020	First draft	Joshua Anderson
0.2	30/06/2020	Updated policy template	Denise Dymond
1.0	27/07/2020	Updated with notes	Phoenix Stewart
2.0	22/02/2021	Format change	Jo Sharpe
3.0	15/07/2021	Updated policy	Sarah Mason
4.0	06/02/2022	Policy reviewed minor changes	Denise Dymond
5.0	30/01/2023	Trustee review no changes	Paul Stewart

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1. Purpose of this document

The purpose of this document is to set out the way in which Swindon and Wiltshire Pride manage data and keep it safe.

Swindon and Wiltshire Pride (SWP) is the charity and our contact details are:

VOLUNTARY ACTION SWINDON

1 JOHN STREET

SWINDON

SN1 1RT

chair@swindonwiltshirepride.co.uk / <https://www.swindonwiltshirepride.co.uk/>

For the purposes of data collection and privacy, Swindon and Wiltshire Pride known in this document as SWP is the **Data Controller** and is responsible for ensuring data is used in accordance with data protection laws.

As Data Controller, Swindon and Wiltshire Pride may share data with “**Data Processors**” who will only use the data for the purposes as instructed by Swindon & Wiltshire Pride (SWP) and as Data Controller, SWP remain responsible for compliance regarding data protection laws

- SWP may use your personal data to manage and administer your information for the sole purpose of updating you with information about the charities events and activity where relevant.
- Data is only shared amongst the SWP Executive Committee (the Data Processors)
- Where we rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time in line with the GDPR regulations 2018

This policy describes how Swindon and Wiltshire Pride (also referred to as “SWP”, “we” or “us”) will make use of the data we handle in relation to all those whose data we store.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

SWP may use your data under the following circumstances:

Via Consent: for mailing lists, emails, requested information and/or contact.

Contractual: in relation to sponsorship, stall holders, entertainment, security staff etc

Legal obligation: to ensure that we carry out our duties in determining Health & Safety risk assessments from stall holders, bar license, security staff license to operate, DBS certificate and others as may be appropriate.

Vital interest: used when needed to process information to protect someone’s vital interests or those of another person, accessibility needs, pre-book a disabled parking/cognitive impairment or designated safeguarding. Likely to be covered by consent in the first instance.

Public task: processing of information to perform a task in the public interest or for an official function, such as organising parade members for safety reasons or road closures.

Legitimate interest:

- Information needed to perform duties (which may be covered above), but may be necessary when asking for information from a minor who had, for instance, lost their parent’s, which would require the need to share with security teams to help locate the parents, in this scenario the minor is not old enough to consent themselves but we have a legitimate interest in gathering and sharing this information.

- Volunteers, Including Trustees

In order to be able to operate efficiently, effectively and economically, it is in the legitimate interests of the Charity to hold such personal information on its volunteers and trustees as will enable the Charity to communicate with its volunteers on matters relating to the operation of the charity, eg:

- the holding of meetings;
- providing information about the Charity's activities – particularly those activities which, by their nature, are likely to be of particular interest to individual volunteers/trustees;
- seeking help, support and advice from volunteers/trustees, particularly where they have specific knowledge and experience;
- ensuring that any particular needs of the volunteer/trustee are appropriately and sensitively accommodated when organising meetings and other activities of the Charity.

2. What information do we collect, how do we collect it and what do we do with it?

SWP collect and process personal data from you or your company volunteer or register to have a stand or sponsorship spot and when we carry out annual reminders for the Event. This could include:

- your name
- your gender,
- your date of birth,
- your home address, email address and phone number.
- your type of sponsorship
- your payment and/or bank account details, where you provide these to pay for membership.
- your marketing preferences, including any consents you have given us.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: such as to make a payment for sponsorship of the Pride Event. This includes:
 - taking payments.
 - communicating with you.
 - providing and arranging the delivery or other provision of products or services.
- As required by Swindon and Wiltshire Pride to conduct our business and pursue our legitimate interests, in particular:
 - we use data of some individuals/sponsors to invite them to take part the following year
- Where you give us consent:
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

- For purposes which are required by law:
 - we may respond to requests by government or law enforcement authorities conducting an investigation.

There are key types of data which we capture as set out below:

Special categories of personal data relate specifically to information that identifies a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and genetic biometric data that may be used to identify a person's health status, sexual orientation, gender reassignment, and finally criminal convictions.

Pseudonymised data is where key data has been separated from the data set so that it can't be used to identify a person without additional info to link them

Anonymised data such as visitor satisfaction surveys where the visitor doesn't give any form of personal data that could identify them.

3. How we store your personal information and keep it safe

Your information is securely stored electronically on cloud based password protected platforms.

4. Who we share your information with and why

Your data is purely shared within the Swindon and Wiltshire Pride Executive Committee for the purpose of the charity's events and activities.

Personal data may be shared with Government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our interests in compliance with applicable laws.

No data will be directly shared by outside of the EEA & EU unless requested by a sponsor to do so.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

We process the majority of your data for as long as you are an active sponsor and for 6 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data unless you ask us to stop, when we will only process the data for a short period after this (to allow

us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract, we keep the data for 6 years from your last interaction with us.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

Records of your involvement in a particular event, may be held indefinitely by us in order to maintain a record of the event such as sponsorship, stall holders, volunteers, visitors etc.

Your personal data will be deleted in a secure way (via confidential waste/secure disposal data held on laptops/cloud based systems).

5. What rights do I have

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format. Correcting data includes correcting information that's inaccurate and requesting the completion of incomplete data. We must supply your data in a machine readable format where it is stored electronically, any paper based records don't have to be provided in machine readable format.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by Rules and Regulations and to ensure continuity of the event. We will inform you which information is mandatory when it is collected. Provided, we may not be able to provide you with appropriate assistance, services, or support.

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests.

There is no fee/ charge to pay for exercising your rights to receive a copy of your data, but we may need to check your identity and request some additional information to help us action your request (especially if you are requesting a copy of your data). We will have one month to respond to your request.

You have an absolute right to opt-out of direct marketing at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “How to contact us?” section below.

6. How to contact us and escalate a complaint

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch by emailing: chair@swindonwiltshirepride.co.uk.

You can also complain to the ICO (Information Commissioner’s Office) if you are unhappy with our response and their contact details are@

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>