

# PRIVACY POLICY

**This privacy policy sets out how The Chellington Centre uses and protects any information that you give The Chellington Centre when you use this website and book dates with us.**

The Chellington Centre is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

The Chellington Centre may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

## **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

By using this website you agree in the use of cookies on this site.

## **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

You should exercise caution and look at the privacy statement applicable to the website in question.

## **Chellington Centre Privacy Notice**

This information is our privacy notice. It explains what we do with your personal information, why we want to use it, how we protect it, and what rights you have to control our use of your personal data.

The most important fact is that it's your personal data. We have complete respect for your rights and we will only use your data where necessary to deliver our services to you or your employer, or if you have asked, to keep you up to date.

## **Information about the data controller**

The data controller is The Chellington Centre, St Nicolas Church, Felmersham Road, Chellington, MK43 7NA. Our registration number with the Information Commissioner's Office is ZA161669

If you want to contact us about any of the points on this notice, or just generally about how we protect your privacy, please email us at [admin@chellington.org](mailto:admin@chellington.org).

## **The purpose and lawful basis for processing your personal data**

We use information for a few different purposes and these each have a different lawful basis. In detail:

- 1) **If you are an existing Chellington Centre customer** - we hold your name and contact details as we have a contractual obligation to deliver services to you. We need your contact details to deliver our services (such as send you update emails when you need to take actions, send you invoices and so on.)
- 2) **If you are a previous Chellington Centre customer** - In the following period of six years

since the end of your visit, we may need to contact you about invoices or if we are asked to provide information for legal reasons.

- 3) **If you are a supplier** associated with The Chellington Centre's field of work, we will hold your contact details because we have a legal requirement to hold financial details for 6 years. We would also hold bank details in order to pay our invoices. We are the data processors of this data.
- 4) **If you contacted us** for information about our services by email or through the contact page on our website, we will hold your name, email address and phone number (if supplied) in our database for 1 year. This helps us to track leads and respond to your enquiry. We will not send you marketing information and you can request to be removed from the list by emailing: [admin@chellington.org](mailto:admin@chellington.org). We are the data processors of this data.
- 5) **If you are a business** associated with The Chellington Centre field of work we may hold your contact details because we have a legitimate interest in doing business with your company. We will aim to hold this information for two years since we were last in contact with you. It's possible we picked this information up from public directories (such as social media and internet searches) or that you passed your details to us with a business card. We are the data processors of this data.
- 6) **If you are a volunteer or employed at** the Chellington Centre we hold your name and contact details to send you update emails and sometimes call you when we need you to consider action as a volunteer or staff member. We are the data processors and do not keep your data if you no longer work or volunteer with us. We are the data processors of this data.
- 7) **Anyone who visits [www.chellington.org](http://www.chellington.org)** – please see above how we use Cookies
- 8) **Chellington Centre customers** – we hold your data in Microsoft 365 for business, on our cloud accounting system (Xero), and in our booking apps (currently Checkfront and 247 Booking).

These systems are password protected and regularly updated and scanned for malware, These companies are data processors for us.

- 9) **All other people we deal with (suppliers, etc.)** we hold your details in Xero and on Office 365. These are data processors for us.

#### **Disclosure of your data**

We may share your data: 1) with any member of the Chellington Centre staff and 2) where we outsource any of our business functions under which we collect or store your data, in which case we will ensure that any such provider follows the same obligations of security with regards to your data as us.

#### **International transfers of personal data, and the measures in place to safeguard it**

Microsoft, Xero, Checkfront are all "cloud-based systems", which means the information is held in huge information data centres in different locations. All the cloud-based systems we use reserve the right to hold copies of your personal information outside the European Economic Area (EEA.) This section explains the impact of these international transfers and how your information is protected. Please note that the reason companies may choose to do this is to hold back-up copies, so they can guarantee recovery.

Xero may transfer your information to servers in New Zealand. The European Commission has approved New Zealand as a country having adequate laws and safeguards to protect your privacy.

Microsoft and Xero may transfer your personal information to cloud data centres in the USA. The personal privacy laws and safeguards in the USA aren't as good, so the European Commission has approved a system called "EU-US Privacy Shield" to make sure the personal information of European citizens is properly protected if held by companies in the USA.

#### **Retention of data**

We will not collect more information than we need to fulfil our stated purposes and will not keep it for longer than is necessary. For applications of employment, this will be for a period of six months, after which the data will be securely destroyed. Retention of client data see above.

#### **Your rights**

You have the right to request a copy of all personal data we hold relating to you and we must provide this within 30 days. We will take reasonable steps to ensure the accuracy of the information that we hold. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect.

You have the right to require us to erase personal data and we must comply unless we need it for one of the purposes described above (for example, to process payroll, to send an invoice or chase payment.) We also retain the right to keep data that is needed to establish, exercise or defend a legal claim.

#### **Access to information**

You may request details of personal information which we hold about you. If you would like a copy of the information held on you, email [admin@chellington.org](mailto:admin@chellington.org).

#### **Right to complaint**

Whilst we will always treat your information with respect and take all reasonable steps to keep that information safe, if you are concerned about any aspect of the way in which we control or process your data you may contact us on [admin@chellington.org](mailto:admin@chellington.org). This will not affect your right to lodge a complaint with

the Information Commissioners Office should you wish to do so.

#### **Our contractual requirements to use your personal data**

If you're a Chellington Centre customer, it's a requirement that we collect personal information from you so that we can enter into a contract with your company.

If you're an employee (or volunteer) at The Chellington Centre customer, we have a legitimate interest in using your personal data so we have a record of who is involved at Chellington, this is our lawful basis for processing your data (which is why we don't ask for your consent to process it.)

#### **Other purposes for processing personal data**

We don't process your personal data for any other purpose than we've described here. We will never sell your personal data to other companies.

Updated 25/05/2018