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## **PRIVACY POLICY (ALSO KNOWN AS OUR GDPR POLICY)**

Open Country is committed to protecting the privacy of all its service users, volunteers, carers, supporters, and the general public who engage with us. We take our duty of processing your personal data seriously. This policy, in compliance with the General Data Protection Regulation 2018 and the Data Protection Act 2018, explains how and why we collect information, how we use it, and what controls we have in place to protect your personal data. This policy will be reviewed at least annually.

### **Responsibility and Review**

#### **Purpose of Data Collection**

The Chief Officer of Open Country is responsible for implementing this policy. The policy will undergo an annual review to ensure compliance with relevant data protection legislation and best practices.

#### **We collect and process personal data for the following purposes:**

- To keep in touch with you, inform you about our activities, events, fundraising appeals, and obtain feedback. (Lawful basis: Consent)
- To assess your eligibility to participate in our activities. (Lawful basis: Legitimate interest)
- To ensure your safety and comfort during our activities, including seeking medical attention if necessary and reporting accidents. (Lawful basis: Legitimate interest)
- To monitor the overall success of our work. (Lawful basis: Legitimate interest)
- To inform you about fundraising efforts, with the option to opt-out. (Lawful basis: Consent)
- Some funders may require personal data to ensure their funds are used for intended purposes. (Lawful basis: Legal obligation)

## Data Collection

### We collect the following types of personal data:

- Contact details (name, address, postcode, email address, phone number, Emergency Contact). (Lawful basis: Consent)
- Personal details (date of birth, medication needs, gender, disability or limiting health condition status). (Lawful basis: Vital interests)
- Information necessary for understanding your progress, such as activity attendance records and correspondence. (Lawful basis: Legitimate interest)
- Photos and digital images with your consent. (Lawful basis: Consent)
- Financial information for donors and supporters who have opted to financially support us. (Lawful basis: Contract)
- Records of accidents occurring during our activities. (Lawful basis: Vital interests)
- Your contact preferences – post, email or phone. You may change the way in which you receive information from us at any time.

## Data Sharing and Transfer

We may share personal data with:

- Delivery partners to provide services to you. (Lawful basis: Contract)
- Statutory third parties when obliged by law (e.g., for safeguarding, taxation, or criminal investigations). (Lawful basis: Legal obligation)
- Funders for monitoring purposes. (Lawful basis: Legal obligation)
- Third-party service providers for software, IT support, auditing, and cloud hosting services. (Lawful basis: Legitimate interest)
- Data transfers are conducted in compliance with data privacy and security requirements, and we never sell, trade, or rent personal data to third parties.

When Open Country shares your personal data, it does so in line with data privacy and security requirements. If you want any more information from any of the recipients or to use any rights regarding the information they hold, please contact Open Country using the details at the end of this notice. We will never sell, trade or rent your details to third parties. Neither is any data transferred internationally.

## Data Retention

We adhere to strict data retention practices, retaining personal data solely for the duration necessary to fulfil the purposes for which it was collected. We conduct regular reviews to ensure compliance with data protection regulations and securely dispose of any unnecessary data.

In accordance with our data retention policy, participants' data is typically disposed of after one year of inactivity, except for activity registers. Activity

registers are retained for a period of 20 years for safeguarding purposes, as mandated by relevant legal requirements and industry standards.

Financial data from donors, including bank details, records of donations, and Gift Aid forms, are retained for a period of seven years, in compliance with financial regulations and audit requirements.

## Data Security

We maintain strict internal procedures to securely collect, hold, and use personal data. All personal data is held securely at our premises in Harrogate or Wakefield and processed by our staff following guidance from the Information Commissioner's Office. **Our registration reference is Z3599363.**

## Rights of Individuals

You have the right to:

- Be informed about how we use your data.
  - Access the information we hold about you.
  - Correct or complete any data we hold about you.
  - Request the removal of data we hold about you.
  - Request a copy of all the data we hold on to you in a transferable format.
  - Restrict the processing of your data in certain circumstances.
  - Object to us using your data for certain forms of processing.
- 4) You can opt-out of receiving fundraising information, but if you have chosen to support us financially we may hold:
- Your bank details.
  - Records of donations you've made to us.
  - Gift aid forms.
- 5) If any accident occurs in the course of our work then we'll keep a record of this (which may include personal data and sensitive personal data).
- 6) For certain funded courses we may hold Eligibility information such as:
- Documentation evidencing your employment status (e.g. JCP/DWP letters)
  - Information about your economic status.
  - Prior attainment level (qualifications held).
  - Other personal information, including whether you are an ex-offender, have a disability or limiting health condition.
  - Information about your current situation and any barriers you are facing, about your skills and abilities and about your goals and aspirations for the project.
  - Questionnaires about your participation in our work e.g. around skills, finances, work experience, self-confidence and well-being.

- Information about your progression from the project into work, education, training or job-search.
- Evaluation information about your experience of the project.

## **WHERE do we obtain your personal data from?**

We may collect your details in a number of ways:

- You will provide it for us or else a family member / key worker will collect data directly from you. We will update this at least every two years.
- When you take part in one of our activities.
- When you respond to a survey or correspond with us.
- We may take records at meetings and activities you attend.
- We may collect information from your use of our website e.g. IP address (see *Appendix 1: How do we use cookies?*).
- From third party sources when you have given them permission to share this, such as Social Services or sign-posting groups.

## **Your RIGHTS**

- **Informed** – this privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.
- **Access** – you can request access to the information we hold about you. through a *Subject Access Request*, we will respond in writing within one month of receiving your request. There is generally no charge to you for provision of this information, except in the case of large, complex or repeated requests.
- **Correction** – you can ask us to correct or complete data we hold about you.
- **Remove** – you can ask us to remove data we hold about you that we do not need for legal or contractual reasons.
- **Portability** – you can request a copy of all the data we hold on you in a form that can be transferred to other organisations.
- **Restrict Processing** – you can stop us from processing your data in certain circumstances.
- **Object** – you can object to us using your data for certain forms of processing e.g. marketing. You can also raise a complaint about our data handling to the *Information Commissioner's Office*.

Open Country will not sell your data or use it for marketing purposes. If we would like to use your data for any other purpose, we will contact you to request consent before we do so.

## How do we contact YOU?

We may contact you by post, telephone or email to keep you informed about our activities. We provide the opportunity for you to opt-out from receiving our communications or to update your contact preferences at any time.

## Contact Information

For any enquiries regarding our privacy practices or to exercise your rights under data protection legislation, please contact us at:

Email: [info@opencountry.org.uk](mailto:info@opencountry.org.uk)

Phone: 01423 507227

Postal Address: Community House, 46 East Parade, Harrogate, North Yorkshire, HG1 5LT

## Appendix 1: How do we use cookies?

### What is a Cookie?

A cookie is a small file attached to a website or web based application 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 on a particular site or page.

Cookies allow websites to respond to you as an individual. Via a cookie the website can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

### How we use Cookies

We use traffic log cookies to identify which pages of our website are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to our customer's 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.

### How you can manage Cookies

You can choose to accept or decline cookies in your web browser's settings. Most web browsers automatically accept cookies, however, you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our website and the individual services we provide.

Policy prepared by:	David Shaftoe
Approved by Board on:	15 <sup>th</sup> May 2018, March 2021
Last updated by David Shaftoe on:	21 <sup>st</sup> February 2024
Next review date:	31 <sup>st</sup> March 2026