

Privacy and Data Protection Policies

Rose Diversity Training

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Privacy Policy

This privacy policy will explain how Rose Diversity Training uses the personal data we collect from you when you use our website.

1.1.1 What data do we collect?

Rose Diversity Training collects the following data:

- Personal identification information (Name, email address, phone number, etc.)

1.1.2 How do we collect your data?

You directly provide Rose Diversity Training with most of the data we collect. We collect data and process data when you:

- Voluntarily complete a customer survey or enquire via email.
- Use or view our website via your browser's cookies.

1.1.3 How will we use your data?

Rose Diversity Training collects your data so that we can:

- Email you with requested information, special offers on other products and services we think you might like.

Rose Diversity Training does not share your data with any other company or service provider without your express consent.

1.1.4 How do we store your data?

Rose Diversity Training securely stores your data via secure Google Drive.

Rose Diversity Training will keep your contact information for 6 months. Once this time period has expired, we will delete your information from our records.

1.2.1 Marketing

Rose Diversity Training would like to send you information about services of ours that we think you might like.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Rose Diversity Training from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, please email finnprice@rosediversitytraining.co.uk.

1.3.1 What are your data protection rights?

Rose Diversity Training would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request copies of your personal data.
- The right to rectification – You have the right to request that Rose Diversity Training correct any information you believe is inaccurate. You also have the right to request Rose Diversity Training to complete the information you believe is incomplete.
- The right to erasure – You have the right to request that Rose Diversity Training erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that Rose Diversity Training restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to Rose Diversity Training processing of your personal data, under certain conditions.

- The right to data portability – You have the right to request that Rose Diversity Training transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: finngrice@rosediversitytraining.co.uk

1.4.1 Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

1.4.2 How do we use cookies?

Rose Diversity Training uses cookies to improve your experience on our website, including:

- Understanding how you use our website

1.4.3 What types of cookies do we use?

There are a number of different types of cookies. Our website uses:

- Functionality – Rose Diversity Training uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

- Advertising – Rose Diversity Training uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Rose Diversity Training sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

1.4.4 How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

1.5.1 Privacy policies of other websites

Rose Diversity Training’s website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

1.5.2 Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 10/11/20.

1.6.1 How to contact us

If you have any questions about Rose Diversity Training’s privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

1.6.2 How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Rose Diversity Training has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Data Protection Policy

Rose Diversity Training needs to collect and use certain types of information about the Individuals or Service Users who come into contact with Rose Diversity Training in order to carry on our work.

This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 1998.

1.1 Data Controller

Rose Diversity Training is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

1.2 Disclosure

Rose Diversity Training may share data with other agencies such as the local authority, funding bodies and other voluntary agencies. The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared.

There are circumstances where the law allows Rose Diversity Training to disclose data (including sensitive data) without the data subject's consent. These are:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of an Individual/Service User or other person
- c) The Individual/Service User has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) Providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where

we would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

Rose Diversity Training regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

Rose Diversity Training intends to ensure that personal information is treated lawfully and correctly. To this end, Rose Diversity Training will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act,
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

Rose Diversity Training will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information

- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken,
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information)
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

1.3 Data collection

Informed consent is when

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Rose Diversity Training will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form. When collecting data, Rose Diversity Training will ensure that the Individual/Service User:

- a) Clearly understands why the information is needed

- b) Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

1.4 Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately. It is Rose Diversity Training's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

1.5 Data access and accuracy

All Individuals/Service Users have the right to access the information Rose Diversity Training holds about them. Rose Diversity Training will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Rose Diversity Training will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so

- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do • It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it holds, manage and use personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the Rose Diversity Training.

Signed: Finn Grice

Position: Director

Date: 10/11/20

Review Date: 10/11/21

3.1 Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information Rose Diversity Training will hold and how it will be held or used.

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person(s) responsible for ensuring that Rose Diversity Training follows its data protection policy and complies with the Data Protection Act 1998.

Individual/Service User – The person whose personal information is being held or processed by Rose Diversity Training for example: a client, an employee, or supporter.

Explicit consent – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Notification – Notifying the Information Commissioner about the data processing activities of Rose Diversity Training, as certain activities may be exempt from notification. The link below will take to the ICO website where a self-assessment guide will help you to decide if you are exempt from notification:

http://www.ico.gov.uk/for_organisations/data_protection/the_guide/exemptions.aspx

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations,

companies and agencies but applies to named persons, such as individual volunteers or employees.

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings