
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 tells you how and why we collect information, how we use it and what controls we have in place to protect your personal data. It will be reviewed at least annually. Our ongoing commitment to the privacy of those whose data we hold is informed by the *General Data Protection Regulation 2018*.

David Shaftoe is the Open Country staff member responsible for the implementation of this policy.

Why hold personal data about YOU?

Open Country needs to collect your personal data in order to:

- Keep in touch with you; inform you about our activities, events or latest news; fundraising appeals; obtain feedback.
- Check your eligibility to participate in our activities.
- Keep you safe and comfortable on our activities.
- Understand your progress.
- Monitor the overall success of our work.
- Inform you about fundraising (you can opt-out). Some Funders may need personal data to ensure their money is being spent for the purposes intended.

We will only ever collect, store and use your personal data when we have a genuine and legitimate reason to do so and are not harming any of your rights and interests. We will never at any time sell, trade or rent your details to third parties.

What personal data do we hold about YOU?

- 1) Contact details (first name, surname, address, postcode, email address, phone number, Emergency Contact).
- 2) Personal details (date of birth, medication needs, gender, if considered to have a disability or limiting health condition).

3) Information about you that help us get to know you better or fulfils our obligations to funders:

- Your contact preferences – post, email or phone. You may change the way in which you receive information from us at any time.
- Records of activities you have attended.
- Records of your correspondence with us.
- Photos and digital images including you where you have given us consent to hold them.

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.

What is the LEGAL basis for Open Country collecting & processing your data?

When you provide your data to Open Country, we become the 'data controller' for the purpose of the 'Data Protection Act 1998' and the 'General Data Protection Regulation 2018'. Open Country is often contractually obliged to collect data, for Example, under the terms of our Social Services funding or an ESF programme.

Will the data be TRANSFERRED to any other organisation?

Open Country may occasionally share or disclose personal data to provide its services to partners such as:

- Delivery partners to help them provide a service to you.
- We may disclose information to other statutory third parties when obliged to by law e.g. for purposes of safeguarding, taxation or criminal investigations.
- Funders, for monitoring purposes.
- Third-parties to let them fulfil their services to us. Their services may include software, systems, IT support, auditors and cloud hosting services.

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 of our data transferred internationally.

HOW LONG does Open Country keep your data?

We will only use and store information for as long as it is required for the purposes it was collected for. We continually review what information we hold and delete securely what is no longer required. We normally dispose of a participant's data if they have not been out with us for one year but we keep countryside activity registers for 30 years, mainly for safeguarding purposes.

Keeping your data SAFE

We will securely collect, hold and carefully use your data using strict internal procedures.

All the personal data we process is held securely at our premises in Harrogate or Wakefield and processed by our staff in accordance with guidance issued by the *Information Commissioner's Office*. **Our registration reference is Z3599363.**

Your information may be held on hard copy, locked away in a filing cabinet, fireproof safe or storage room, or on a password-encrypted computer, laptop or USB stick.

Open Country checks our delivery partners and suppliers adhere to good data protection practice.

You can contact us using the details at the end of this notice if you want more information about how we protect your personal data.

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.

How to contact OPEN COUNTRY:

Write to Community House, 46 East Parade, Harrogate, North Yorks, HG1 5LT

For Wakefield users only, Thornes Park, Thornes Road, Wakefield, WF2 8QL.

Telephone 01423 507227 and speak to a member of the team or email info@opencountry.org.uk

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 th May 2018
Last updated by David Shaftoe on:	2 nd April 2020
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