



Portishead Pool Community Trust Privacy Policy 2018

Portishead Pool Community Trust is committed to protecting your privacy when you use our services.

The Privacy Notice below explains how we use information about you and how we protect your privacy.

We have a Data Controller who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Controller, at info@portisheadopenpool.org.uk

Do you know what personal information is?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person.

Information we may collect about you may include (but is not limited to):

Name
Address
Telephone numbers
Email addresses
Photographs (For season ticket)
Data of birth
Gender
Occupation

Ethnicity
Bank details
Health data
CCTV images
Computer IP address
Dependent Details (only where applicable)

Did you know that some of your personal information might be classified as ‘special’?

Some information is ‘special’ and needs more protection due to its sensitivity. It’s often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal information relating to your:

Sexuality and sexual health
Religious or philosophical beliefs
Ethnicity
Physical or mental health
Trade union membership
Political opinion
Genetic/biometric data
Criminal history

We will only collect this type of information if it is necessary to your contract so that we can provide the right services to you.

We may at times need to share this information. We will only do this if we have your consent or if there are legal requirements for us to do so. We may receive information about you from other data controllers, such as the police who might tell us about a crime they are investigating where this impacts on your contract with us. If you give us this information about yourself when communicating with us, you do so because you consider it forms part of a legitimate interest for us to hold this information on our records.

If we ask for any sensitive personal data about you, we will always tell you why we need it and ask for your consent to hold it.

Why do we need your personal information?

We may need to use some information about you to:

- deliver services and support to you;
- to carry out our obligations arising from any contracts entered into between you and us;
- manage those services we provide to you;

- service improvement
- prevention/detection of crime/fraud

How the law allows us to use your personal information

There are a number of legal reasons why we need to collect and use your personal information.

Generally we collect and use personal information for the purposes of where:

- you are entering or have entered into a contract with us
- you, or your legal representative, have given consent
- it is necessary to protect someone in an emergency
- it is required by law
- you have made your information publicly available

Consent and Your Preferences

We may contact you or send communications to tell you about a service enhancement such as improvements or to keep you informed of your current membership status. We won't need your consent to communicate with you this way because we have assessed that it forms part of our agreement with you and it is of mutual interest for us to keep you informed and is relevant to your contract with us.

If however you do not wish to receive information on our products and services, you have the right to remove it at any time.

If you want to update or remove your consent, please contact info@portisheadopenpool.org.uk and we can process your request.

We only use what we need!.

We'll only collect and use personal information if we need it to deliver a service or meet a requirement.

If we don't need personal information we'll either keep you anonymous if we already have it for something else or we won't ask you for it. For example in a survey we may not need your contact details so we'll only collect your survey responses.

We won't sell your personal information to anyone else.

We will always provide an option for updating your marketing preferences on our communications with you.

What you can do with your information

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

You can ask for access to the information we hold on you

You have the right to ask for the information we have about you. When we receive a request from you in writing, we must give you access to what personal information we've recorded about you.

However, we can't let you see any parts of a record which contain:

- Confidential information about other people; or
- May be held in preparation to defend legal claims

This applies to personal information that is in both paper and electronic records. If you ask us, we'll also let others see your record (except if one of the points above applies).

A request for personal information can be made via email or in writing. This is known as a subject access request. In order to make a subject access request you will need to provide the following information:

- your name
- your address
- proof of identity and signature
- enough information to identify your records

What types of documents could I submit as proof of ID?

- Copy passport with signature (please remove your passport number)
- Copy driving license picture with signature (please remove your driver number)

You can write to us at the following address:

Data Controller
Portishead Pool Community Trust Limited
Esplanade Road
Portishead
BS207HD

We will not start your subject access request until we are satisfied that you have provided us with enough information for us to identify you.

Once you have made a request you will receive an acknowledgement and your request should be answered within one month. In certain circumstances, we are allowed to take longer but we will tell you if we feel we may need longer without undue delay from when we receive your request.

You can ask to change information you think is inaccurate

You should let us know if you disagree with something we may have recorded about you.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

You can ask to delete information (right to erasure)

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place
- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it)
- Where deleting the information is a legal requirement

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we're required to have it by law
- it is for historical research, or statistical purposes where it would make information unusable
- it is necessary for legal claims

You can ask to limit what we use your personal data for

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate personal information, and have told us of it
- where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether

We will assess whether you have a right to a restriction and where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law or we have a legal basis to do so, such as a contract.

Visiting our website

When you visit our website we collect standard internet log information for statistical purposes via Google analytics.

- We use Google analytics to collect information in an anonymous way, including the number of visitors to the site.
- We do not make any attempt to identify visitors to our websites. We do not associate information gathered from our site with personally identifying information from any source.
- When we collect personal information, for example via an online form, we will explain what we intend to do with it.

Our websites contain links to various third party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.

How we use your telephone number and/or email address

Text messages and contact via telephone or email provide a direct way to contact and share information with you about the services we can deliver to you. It can also help you to receive

important messages about your membership, important site updates e.g. temporary closures and other services that we provide you.

If you provide your telephone number we may keep in contact with you by text.

Operational SMS/text messaging and calls

If you supply us with your telephone contact details, we may use them to call or send you operational text messages.

Examples of operational text messages include:

- Confirming a booking or volunteer shift.
- Emergency site updates.

Sharing your telephone number and /or email address with third parties

We will not share your telephone number or email address third parties unless required to do so by law.

Who do we share your information with?

We use a range of organisations to either store personal information or help deliver our services to you. Where we have these arrangements there is always an agreement in place to make sure that the organisation complies with data protection law.

We may enter into partnerships with other organisations such as local authorities and the police. In order to protect your information, we will enter into a legally binding data sharing agreement with partner organisations before any sharing takes place. It is not always possible for us to tell you that personal information is being shared, for example when we are working with the police or other agencies to help the investigation or detection of a crime as to do so may prejudice that investigation.

We are likely to share your personal information with the following:

- Police

We may share your personal information with the police for the purposes of preventing or detecting a crime or fraud.

- Safeguarding and Support Agencies

We may need to share your personal information with support agencies if we suspect that there may be safeguarding concerns about yourself or those who are your dependent(s). We

will not tell you about this beforehand, we will take steps to only share that personal information which is necessary for the safeguarding purposes.

- Debt Recovery Agents

We may share your personal information with debt recovery agents for the purposes of recovering any outstanding charges owed to us.

- Legal Services and Partners

We may share your personal information with our legal services or solicitors if we are preparing or defending a legal claim.

Sometimes we have a legal duty to provide personal information to other organisations, this is often because we need to give that data to the police, courts, local authorities or government bodies.

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This doesn't happen often, but we may share your information:

- in order to detect and prevent a crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals;
- safeguarding of vulnerable individuals

If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

For all of these reasons the risk must be serious before we can override your right to privacy.

We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so and will not cause harm, distress or further risks to you, our staff, other professionals and/or the public.

How do we protect your information?

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cipher'. The hidden information is said to then be 'encrypted'
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches)

Where in the world is your information?

The majority of personal information is stored on systems in the UK. But there may be some occasions as our technology services progress where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.

We will always have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We'll take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

How long do we keep your personal information?

There's often a legal or a contractual reason for keeping your personal information for a set period of time. We will keep your information for the duration of providing a service or product to you under the terms of a contract, such as your membership contract. When your contract has ended we will keep your personal data for a set time for auditing and reporting purposes and for legitimate interest purposes, after that time we will either anonymise or destroy your information.

You can ask us for a copy of our retention periods by contacting us at:

Data Controller

Portishead Pool Community Trust Limited

Esplanade Road

Portishead

BS207HD

Portishead Pool Community Trust takes responsibility to protect the personal information we hold about those with whom we work seriously. We are accountable for our processing and take necessary technical and operational steps to maintain information security protections.

If you suspect your personal information or that of others may have been at risk of a data protection breach, please tell us by contacting us at info@portisheadopenpool.org.uk

Where can I get advice?

If you have any worries or questions about how your personal information is handled please contact our Data Controller at: info@portisheadopenpool.org.uk

Issue 1. May 2018