



November 2019

[Review – November 2020]

## **PRIVACY POLICY**

**Friends of Hardie Park Ltd (Registered Charity No. 1172078 & Company no. 10085963) is a Registered Charity, Hardie Park Projects CIC (Company No. 08159033) is a Community Interest Company and a wholly owned subsidiary and this policy covers all activities for both organisations.**

**This policy is designed to protect the rights and information that we hold on customers, employees, volunteers (including work experience placements), stakeholders, partners and contractors.**

**Friends of Hardie Park & Hardie Park Projects CIC (“we”) promise to protect and respect any personal data you share with us, or that we get from other organisations.**

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

Registered office address:

Hardie Park Cafe, Hardie Road, Stanford-Le-Hope, Essex SS17 OPB

This privacy statement tells you about the type of data we collect and how we use it.

We use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Our use of cookies to improve your use of our website
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it

You can email [info@friendsofhardiepark.co.uk](mailto:info@friendsofhardiepark.co.uk) or call 07803 295374 to ask about the data we hold on you, make changes or ask us to stop using it.

## **WHY WE COLLECT DATA FROM YOU**

We may use the information to improve your experience at Hardie Park.

We may use the information to improve our services as a business.

We may periodically send promotional and updates emails with regards to events, special offers or other information which we think you may find interesting using the email address or Facebook name which you have provided.

We may use the information to review and improve training with the business.

## **HOW WE COLLECT DATA FROM YOU**

### ***When you give it to us directly***

You may give us your information when you make enquiries through our website, Social Media sites and pages, clubs, activities and events, when you complete a form, survey or when we speak directly on the phone.

During that first point of contact you will be asked if you want to opt-in to our marketing communications database, so you can receive relevant marketing materials and updates. A follow-up email will always be sent to confirm your subscription and you can opt out at any time. When we meet at events, you may give us your details so we can contact you with relevant information in the future.

We will hold your data for as long as you are interacting with the content we are sending you. If you stop interacting or request to be removed, you will remain on our database indefinitely on a suppression list so we know never to contact you in the future.

## ***We may obtain information from a third party***

As a community based organisation we achieve a lot through connections that we have. Often we may obtain your details through a friend, relative, colleague. This is usually to make contact about a specific request, issue or more generally informing about what we do.

When we contact you through these means we inform you of our Privacy Policy and tell you where you are able to find it online and expressly ask your permission to retain your contact information, for future use. You have the right to refuse.

## ***What we do when we email you***

When we send you a mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on.

We use third-party software owned by Mailerlite to send marketing emails, for more information on their privacy policy please visit [www.mailerlite.com](http://www.mailerlite.com)

When you give permission to OTHER ORGANISATIONS to share or it is available publicly

We may combine information you provide to us with information available from external sources so we get a better understanding of you. This information can also help us improve our service offering. The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

- Third party organisations  
You may have provided permission for a company or other organisation to share your data with third parties.
- Social Media  
Depending on your settings or the privacy policies for social media like LinkedIn, Instagram, Facebook or Twitter, you might give us permission to access information from those accounts.  
Information available publicly  
This may include information found in places such as Companies House and information that has been published in articles or newspapers.

## ***The personal data we collect***

The type and quantity of information we collect and how we use it depends on why you are providing it. If you contact us through our website or our other online forms, booked a club, workshop or event on the phone, online or face to face, we will usually collect:

- Your name
- Your address
- Your email address
- Your home, business or mobile telephone number
- Your previous booking(s)

We will mainly use your data to:

- Provide you with the services, products or information you've requested
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Send you direct marketing

Building profiles of our prospects and targeting communications. We use profiling techniques to ensure communications are relevant, timely and to provide an improved experience. Profiling also allows us to target our communications effectively so we do not contact you with irrelevant information.

When building a profile, we may analyse geographic and other information relating to you to better understand your needs and preferences so we can contact you with the most relevant communications. We may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you.

### ***Direct Marketing***

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you have told us about.

In the case of email, we will give you an opportunity to opt out of receiving them during your first purchase with us. If you do not opt out, we will provide

you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively log into your account on our website at any time to unsubscribe. We may also contact you about our work by telephone.

However, we will always get explicit consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to your purchase. If you wish to opt out of our communications you can contact us on 07803 295374 or [info@friendsofhardiepark.co.uk](mailto:info@friendsofhardiepark.co.uk)

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental right and freedoms. You have the right to object to any of this processing at any time. If you wish to this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

### ***Third Parties***

We do not sell or share personal details to third parties for the purposes of marketing.

### **How we keep your data safe and who has access**

To our knowledge we comply with GDPR. There are appropriate technical, physical and management controls in place to protect your personal details. For example, our network is protected and routinely monitored. There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our own service providers who process data on our behalf and on our instructions. In these cases we require that these third parties comply strictly with our instructions and with data protections laws, for example around security of personal data.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- If we run an event in partnership with another named organisation your details may need to be shared. We will be very clear what will happen to your data when you register so you have the option to opt out.

### *Your debit and credit card information*

If you use your credit or debit card to purchase from us, we will ensure that this is carried out securely and in accordance with the payment card industry data security standard (pci-dss). We do not currently store your card details in our system.

### *Your right to your personal information*

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the end of this policy if you would like to exercise this right.

## **LEGAL BASIS**

There are three bases under which we may process your data:

- **Contract Purposes**

When you make a purchase from us, you are entering into a contract we need to process and store your data.

As we may need to contact you by email or telephone in the case of cancellation of a class, workshop or event, or in the case of problems with your payment. If you have signed up yourself or a child to an event or workshop then we will need to store your data in the case we need to contact you in regards to any changes with that event or workshop.

- **Legitimate Business Interests**

In certain situations we collect and process your personal information for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing.

- **With your explicit consent**

For any situation where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

## **YOUR RIGHT TO KNOW WHAT WE KNOW ABOUT YOU, MAKE CHANGES OR ASK US TO STOP USING YOUR DATA**

You have a right to ask us to stop processing your personal data by either calling us on 07803 295374 or email [info@friendsofhardiepark.co.uk](mailto:info@friendsofhardiepark.co.uk)

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to the Chief Executive Officer, Friends of Hardie Park, Hardie Park Cafe, Hardie Road, Stanford-Le-Hope, Essex SS17 OPB. If you have any questions please send these to [info@friendsofhardiepark.co.uk](mailto:info@friendsofhardiepark.co.uk)

### ***Changes to this policy***

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting the Chief Executive Officer, Friends of Hardie Park, Hardie Park Cafe, Hardie Road, Stanford-Le-Hope, Essex SS17 OPB. If you have any questions please send these to [info@friendsofhardiepark.co.uk](mailto:info@friendsofhardiepark.co.uk)

The latest version of this policy will be available to view or download at <https://www.friendsofhardiepark.co.uk/ourprivacypolicy>

Signed on behalf of the Trustees



Rob Groves  
CEO