

FACES Bedford

PRIVACY NOTICE

Introduction

FACES respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we use and look after your personal data when you visit our website and when we provide our services to you regardless of where you visit from and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. [***IMPORTANT INFORMATION AND WHO WE ARE***]
2. [***THE DATA WE COLLECT ABOUT YOU***]
3. [***HOW IS YOUR PERSONAL DATA COLLECTED***]
4. [***HOW WE USE YOUR PERSONAL DATA***]
5. [***DISCLOSURES OF YOUR PERSONAL DATA***]
6. [***INTERNATIONAL TRANSFERS***]
7. [***DATA SECURITY***]
8. [***DATA RETENTION***]
9. [***YOUR LEGAL RIGHTS***]
10. [***GLOSSARY***]

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how FACES collects and processes your personal data through all your engagements with us, when using our services, and use of this website, including any data you may provide when you sign up to our services, our newsletters or request information about other services from FACES.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

What if I am a user aged 16 or under?

If you are aged 16 or under, please get your parent/guardian's permission before you provide any personal information to FACES. Users without this consent are not allowed to provide us with personal information.

Controller

FACES Bedford is the controller and responsible for your personal data (collectively referred to as "FACES Bedford ", "Faces", "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any

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questions about this privacy notice, including any requests to exercise your legal rights (including an opt-out mentioned in this privacy notice), please contact the DPO using the details set out below.

Contact details

Data Protection Officer

FACES Bedford

Email address: DPO@facesbedford.org

Postal address: Church Lane Community Centre, 147 Church Lane

Goldington, Bedford MK41 0PW

Telephone number: 01234 270601

<https://www.facesbedford.org>

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 7th June 2018.

The data protection law in the UK changed on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests immediately as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes - first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes - address, email address and telephone numbers.

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- **Financial Data** includes - bank account and payment card details.
- **Transaction Data** includes - details about payments to and from you and other details of services you have received from us.
- **Technical Data** includes - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website [and our services.
- **Profile Data** includes - your username and password, services purchased by you, your interests, preferences, feedback.
- **Social Media Data includes:** Facebook, Twitter, Instagram, LinkedIn
- **Usage Data** includes - information about how you use our website, services.
- **Marketing and Communications Data** - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) if it is necessary to perform our services. When we do this we will provide further information as to why we are collecting your information and how we will use it.

We will ensure that all these aspects of your data is stored in an encrypted manner.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our xxx or xxx services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms, agreements or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - Apply for our services;
 - Enter into an agreement with us;
 - Subscribe to our service or publications;
 - Request information to be sent to you;
 - Give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your

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equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - a) Analytics providers such as Google based outside the EU;
 - b) Local Authorities and Reference Agencies.
 - c) Identity and Contact Data from publicly available sources such as the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the service or contract we are about to enter into or have entered into with users of our services
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To inform you of relevant activities held by FACES Bedford

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

1. to comply with any statutory duty or legal obligation;
- 2.
- 3.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide our services, activities and to deal	(a) Identity (b) Contact (c) Profile	Legitimate Interest - providing a service

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with your requests and enquiries		
To process your referral and to comply with any statutory duty or legal obligation; including: (a) Supporting a family and / or children (b) Partnering other support organisations	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary for our legitimate interests (to action the referral) (b) Necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Sending our newsletter, details of activities, invite to an event or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Legitimate Interest - providing a service (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how clients use our services
To deliver relevant website content and potential available services to you and measure or understand the effectiveness of the details we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, services, marketing	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy

Marketing

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We strive to provide you with choices regarding certain personal data uses, particularly around marketing and communications.

You will receive marketing communications from us if you have requested information from us or entered into a contract for services from us or if you provided us with your details when you registered interest in one of our activities and, in each case, you have not opted out of receiving that marketing.

Third-party marketing - We will where applicable share your data with third parties (contractors and partners) to enable us/them to provide you with the services, activities or online content you select.

However, we will never sell your data to third parties.

Offensive or inappropriate content on FACES website

If you post or send offensive, inappropriate or objectionable content anywhere on or to FACES websites or otherwise engage in any disruptive behaviour on any FACES service, FACES may use your personal information to stop such behaviour.

Where FACES reasonably believes that you are or may be in breach of any applicable laws (e.g. because content you have posted may be defamatory), FACES may use your personal information to inform relevant third parties such as your employer, school email/internet provider or law enforcement agencies about the content and your behaviour.

Opting out

You can ask us to stop sending you our newsletters or details of our services at any time by following the opt-out links on any marketing or communication message sent to you or by contacting us at any time at **FACES, Church Lane Community Centre, 147 Church Lane Goldington, Bedford MK41 0PW**

Telephone number: 01234 270601 or email admin@facesbedford.org

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any contractual or legal relationship we have with you.

Cookies

We employ cookie technology to help log visitors to our web site. Cookies are pieces of data that are often created when you visit a website, and which are stored in the cookie directory of your computer or mobile device. A number of cookies may be created when you visit the Havers website. The cookies do not contain any personal information about you, and they cannot be used to identify an individual user.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some of the enhanced features of this website may become inaccessible or not function properly.

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Log files

When you visit this website we collect web statistics concerning your visit, which are stored in a log file. Log files allow us to record visitors' use of the site. Log files are also used to detect potential harmful users which may be reported to the relevant authorities.

5. Disclosures of your personal data

We may have to share your personal data with relevant third parties for the operation of your agreement with us.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your data outside the European Economic Area.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, volunteers and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our clients. (including Contact, Identity, Financial and Transaction Data).

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in

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which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see these within the glossary below ([link](#))

If you wish to exercise any of the rights set out above, please contact us ([link](#)) or at **DPO, FACES, Church Lane Community Centre, 147 Church Lane Goldington, Bedford MK41 0PW**

Telephone number: 01234 270601 or email admin@facesbedford.org

No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us ([link](#))

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Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

- Service providers [acting as processors] based within the EU who provide IT and system administration services
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based within the EU who provide [consultancy, banking, legal, insurance and accounting services].
- HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based in the United Kingdom [who require reporting of processing activities in certain circumstances].

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our

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use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

SIGNED Eve Burt Chair of Trustees

DATE 07.06.2018

FACES Bedford will work to this Policy and will monitor, review and evaluate its effectiveness.

DOCUMENT INFORMATION	
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