

Privacy Notice

The Sounding Boards Network

September 2021



Introduction

This notice explains how we use your personal data in relation to the services that the Sounding Boards Network ('TSBN') offers. It also explains the decisions that you can make about your information. This notice applies to the following services that we offer:

- the Network
- in person gatherings ("Sweet and Savoury")
- skill sharing

These offerings are referred to in this notice as the "**services**".

TSBN is responsible for your personal data, or to use data protection terminology, TSBN is a "controller" or "data controller" of your personal data.

The purpose of this notice is to help you understand **how** and **why** your personal data is collected in relation to the services and **what** we do with that information. It also explains the decisions that you can make about your information.

If you have any questions about this notice please contact the Data Protection Officer through the office by email at info@thesoundingboardsnetwork.org or by telephone on 0203 951 8779.

How we use your information

Our main reason for using your personal data is to enable TSBN to provide its services to you and others.

We collect personal data directly from you when you enquire about the services. If you are a member or volunteer of TSBN then we will collect and use your name, email address, telephone number, address, and information about your requirements so that TSBN can provide the services.

If you are a donor then we will collect and use your name, email address and contact details to process your donation and send you a thank you.

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We also use personal data for other purposes related to your use of the services. These other purposes are as follows:

- To enable TSNB to provide the services. For example, we will keep a record of your requirements.
- To approve volunteers and match them with members (including assessing volunteers' suitability for the role and understanding the needs of members), or approve volunteers for office-based roles
- To carry out DBS checks on volunteers who are applying to TSNB, to ensure that they are suitable to volunteer for us.
- To process grant applications to ensure that we can still provide the services.
- To allow us to receive donations which will help to enable TSNB to run.
- To improve the services for you and other users. For example, we may keep a record of your preferences and interests to enable us to deliver a better service. If you give us feedback we will use that in order to improve. This is necessary for our legitimate interest in managing what we offer and improving the services.
- To make any adjustments, for example, if you ask us to change how you access the services because of a disability you have. We also use personal data in order to help make sure that the services are used in an appropriate way and to reduce and manage the risks to you and other users. As part of this we will use information concerning any health condition and/or disability you may have. We, and the other users of our services, have a legitimate interest in ensuring that the services are used appropriately and safely. In addition, we have a legal obligation under health and safety laws to make sure that our services are used appropriately.
- To make sure that you are complying with our rules and using the services appropriately. If we stop you using any services (for example, because of your bad behaviour) we will keep a record of that and we may prevent you from using the services in future. As with the above, we, and the other volunteers and members have a legitimate interest in ensuring that the services are used appropriately and safely.
- If there is a problem, for example, if you or someone else has made a complaint then we have a legitimate interest in using personal data in connection with that complaint, for example, so that we can find out what happened and put things right.

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- We may also take photographs of you. The photographs will be used in connection with our publicity, for example, they may appear on our websites, promotional material and on social media. We have a legitimate interest in publicising our activities. We may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal data you can take back this consent at any time. Please contact the Data Protection Officer if you would like to withdraw any consent that you have given.

We also have a legitimate interest in using your personal data in other ways as follows:

- Regardless of the relationship we have with you, we may need to use your personal data for legal reasons such as fraud prevention and to check that you are complying with our rules or terms and conditions and to enforce our legal rights.
- We may share your personal data with our legal advisors or insurers.
- In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (for example, if you or they are seriously hurt).

We use contractors to handle personal data on our behalf for the following purposes:

- An umbrella body to carry out DBS checks, and record the results;
- IT consultants who might access information about you when checking the security of our IT network;
- We use a service provider for processing online donations and shop purchases.
- We may also use a company to assist us with our marketing emails;

Where you are an employee of a contractor, we process your name, job title and business contact details in connection with performing our contract with your employer. This is for our legitimate interest in providing the services to your employer.

Customers of the shop:

- We collect and process your name, email address and address so we can provide products and services to you. Such processing is necessary for the performance of the contract between us.

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- We may also process feedback you provide to us on our products and services. Such processing is necessary for the legitimate interest of managing the shop and improving our products and services.
- We will hold information that is relevant to your order, such as your name, email address and address. If you have purchased items for yourself then we need this information so that we can provide you with the items you have purchased. If you have purchased them for someone else then this is necessary for our legitimate interest in providing the items you have ordered so we can fulfil our obligations under our contract with you.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

If you have any questions about any of the above, please contact the Data Protection Officer.

Keeping you updated

We may contact you with marketing material by email, telephone, post or by text message but we will only do this where we are allowed to do so under data protection law. Sometimes we will need your consent first.

For example, we may send you information about services that you may be interested in.

If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that. Any use of your information before you withdraw your consent remains valid. Please contact the Data Protection Officer if you would like to withdraw any consent that you have given.

Particularly sensitive information

We have extra obligations when we process particularly sensitive information. This includes what is called "special category" personal data under data protection law. The categories of information we are concerned about are as follows: personal data revealing gender, gender reassignment, racial or ethnic origin, religious or philosophical beliefs, health information, disability information, information about sexual orientation, and information about criminal, convictions or offences. We may process "special category" personal data as follows:

- We may need to use information about your health or condition, any disability you may have, or any care that you may need, so that we can make adjustments

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for you. For example, in respect of access or in connection with the use of our services.

- We may hold health information about you so that we can take appropriate action if you have an accident or are unwell.
- We may hold information about for example, gender, gender reassignment, disability, racial or ethnic origin, religious or philosophical beliefs and sexual orientation for equality monitoring purposes required by funders or to help match you with a member / volunteer.

Using personal data in this way is in the substantial public interest. It may also be necessary for medical purposes, for example if we need any allergy information when providing food or if you fall ill at one of our gatherings or skill sharing sessions.

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights. Please see our separate Recruitment of Ex-offenders Policy, available on request.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect individuals and you are not capable of giving your consent, or where you have already made the information public.

How long will we use your personal data for?

We only retain your personal data for as long as is 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.

Further information on our data retention periods can be found in our Data Retention Policy, available on request.

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Overseas transfers

Any personal data that you submit to us will be held on secure servers based within the UK, with the exception of payment details. When you pay for goods through the shop, we use Paypal to administer payments on our behalf. Paypal stores information on servers that are based in the US, but transfers to the US servers are protected by Binding Corporate Rules, and standard contractual clauses for any onward transfers. This means that your data is protected to the same standard as it would be if it stayed within the UK.

Your rights in relation to our processing of your personal data

You have the following rights:

- **Correction:** if information we hold about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract; and (c) the information is being processed by us on computer or other automated device such as a mobile phone.
- **Restriction:** you can request that we restrict how we use your personal data.
- **Objection:** you may object to us using your information where:
 - we are using it for direct marketing purposes (for example, to send you marketing information about our services);
 - the lawful basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest; and
 - if we ever use your information for scientific or historical research purposes or statistical purposes.

If you fail to provide certain information when requested, we may not be able to provide the services. We may also be prevented from complying with our legal obligations.

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You have a right to lodge a complaint with the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal data we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

If we delete your personal data or restrict our use of it, we may not be able to provide our services to you.

If you want to exercise any of your rights, you can contact us by email - info@thesoundingboardsnetwork.org. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights.

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