

Tregovenek Privacy Notice

What is this notice all about?

We want to be transparent about how we collect and use your personal data and this privacy notice exists to tell you exactly how we will do this.

Our privacy notice tells you the journey of your personal data from the moment it enters our systems up until it's time for us to say "goodbye 🙋", as well as the various stops it makes along the way.

These are the types of data we may process:

- Your personal details such as name and contact details
- Demographic information about you
- Your bank account details
- Your emergency contact details
- Your accessibility and/or dietary requirements
- Photos or videos with you in and quotes that you have made

How we get the personal information and why we have it

- You provide your **name** and **contact details** when you apply to be involved as a member or loan stock holder, Director, volunteer (in a circle or in the garden), supporter, contractor, customer or tenant.
- You may provide **demographic information**. We use this to build a picture of who participates in Tregovenek activities and to monitor our efforts to promote equality and inclusivity, under the Equality Act 2010. You are not required to give this information and can opt-out (choosing not to provide it). This includes special categories of personal data such as information concerning your gender, nationality and racial or ethnic origin, disability information, sexual orientation, faith, educational attainment and carer responsibilities.
- You may provide your **bank account details** to enable us to reimburse expenses or repay loanstock or shares.
- You may provide your **accessibility** or **dietary requirements** to enable us to make adjustments and meet your dietary needs.
- You may provide **emergency contact details** or **references** when you apply to be involved as a volunteer or are a tenant.
- We may take **photos**, make **video recordings** of activities, or reproduce **quotes** from participants for use on our website or social media channels to promote awareness of Tregovenek. If you do not wish to have your photo taken please inform the activity leader.

Basis for processing

Under Article (6) (1) of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing are:

(b) Contract for **name, contact details** if you are a customer, are attending an event, are a contractor or a tenant.

(c) Legal obligation for **name, contact details, shareholding/loan stock amount and eligibility criteria** if you are a Director or Member. **Name and deposit information** if you are a tenant.

(f) Legitimate interest for your **name, contact details, accessibility and dietary requirements and emergency contact** if you are a volunteer or customer.

Consent for processing your **bank account details, images, quotes** if you are a volunteer and for using your **contact details** to keep you informed.

Your **access requirements**, and **demographic information** may be sensitive personal data.

We also rely on the following Conditions for Processing under Data Protection Act 2018 Schedule 1:

- Explicit Consent (Article 9 (2) (a))

Sharing your personal information

- We may share your information externally in order to meet our legal obligations, we share your **name** with the Financial Conduct Authority if you are, and for as long as you are, a member and/or Director.
- We may share your **access and dietary requirements** with activity coordinators and caterers to meet your access and dietary needs
- We may share your **name, contact details** with members of our broader team to manage your involvement in the Tregovenek activity. This team may consist of:
 - Tregovenek volunteers and Directors
 - External contractors brought in to provide specific expertise or additional capacity.
- We may share **medical information** you have provided to emergency services if you require emergency medical attention.

How we store your personal information

Your information is securely stored using Google.

- Google servers, located in the United States, Ireland, Netherlands, Taiwan, Singapore, Denmark, Finland, Belgium and Chile.

How long do we keep your personal data?

- We will retain your **name, contact details, access and dietary requirements** and **bank account details** for as long as necessary for the relevant activity or for six months after a one-off event or activity to complete all administration and assess the outcomes of our events or activities.
- With your consent, we will retain your **name, contact details** and **demographic information** for six years, and keep it updated as we continue to engage with you.
- With your consent, we will retain and use **photos, videos** or **quotes** for up to six years after an event or activity. Where we intend to use photographs, videos or quotations that identify you, we will only do so with your consent unless another lawful basis applies. You may withdraw your consent at any time.

When you register to be on one of our mailing lists

- What personal data do we collect, why do we collect it, and what legal basis do we rely on?
 - When you register to receive updates and be on one of our mailing lists, we'll need your email address and your name. Under the Privacy and Electronic Communications Regulations, we need your specific consent to send you electronic updates.
- Who processes that data?
 - Tregovenek Ltd (Community Benefit Society, registered with the Financial Conduct Authority. Number 8767) is the data controller and processor.
- Where do we store it?
 - 20i servers, located in Northampton, UK
 - MailChimp servers, located in the United States
- In what situations and with which parties do we share personal information?
 - We don't share this information with parties without your permission.
- How long do we keep it for?
 - Unless you specifically ask us to delete your personal information, we retain your personal information as long as it is necessary to keep you updated about Tregovenek. If you unsubscribe from our mailing list or request that we do not contact you, we will keep your name and email address on a "do not contact" list to ensure we comply with your wishes.

What are your rights?

The right to be informed

You have the right to be informed about the collection and use of your personal data, the purposes for processing, retention periods for that personal data and who it will be shared with. We have set this information out in this privacy notice.

The right of access

You have the right to ask us for copies of the data we hold about you. If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information.

The right to object

You have the right to ask us to stop processing your personal information in some circumstances, such as when we are relying on our own (or someone else's) legitimate interests to process your personal information, when we are processing your personal information for direct marketing or when we are processing your personal information for research.

The right to rectification

You have the right to ask us to rectify the personal information you think is inaccurate or to complete information you think is incomplete. When you ask us to rectify your information, if we've shared your personal information with others, we'll let them know about the rectification where possible.

The right to erasure

You have the right to ask us to erase your personal information, in some circumstances, such as where we no longer need it or you withdraw your consent (where applicable).

The right to restrict processing

You have the right to ask us to restrict the processing of your personal information for a period of time in some circumstances, such as where you contest the accuracy of that personal information or object to us processing it. This right is separate from the right to object and will only stop us from using your personal information further, not from processing it. If we've shared your personal information with others, we'll let them know about the restriction where possible.

The right to data portability

You have the right to ask that we transfer the personal information you gave us to another organisation, or to someone else, in some circumstances.

You don't have to pay anything to exercise your rights. Please contact us by sending an email to **data@tregovenek.org.uk** if you wish to make a request under your rights; we will respond to any requests within a calendar month to get back to you with a response.

How you can complain

If you have any concerns about our use of your personal information, please let us know by:

- Emailing us at **data@tregovenek.org.uk**
- Writing to us at: **Tregovenek, Pentiddy Woods, Attwood Lane, Pensilva, Cornwall, PL14 5QU.**

If you are not satisfied with our response or are unhappy with how we have used your data, you can complain to the Information Commissioner's Office (ICO). You can find the ICO contact details below:

- ICO Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Helpline number: 0303 123 1113.
- ICO Website: <https://www.ico.org.uk>

Our contact details

- Email: **data@tregovenek.org.uk**
- Address: **Tregovenek, Pentiddy Woods, Attwood Lane, Pensilva, Cornwall, PL14 5QU.**

Status of Privacy Notice

This Privacy Notice is non-contractual. We reserve the right to amend it from time to time. Amendments will be posted to the website and, where appropriate, through email notification. Unless otherwise specified all such changes will take effect immediately upon posting to the website.