

Outside the Box privacy policy

We want everyone we work with to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you) if you attend any of our OTB services, apply for a job or volunteer placement, or have a business relationship with us.

Outside the Box Privacy Policy may change so please remember to check back from time to time. This is version 1.1 which was last updated on the 16th April 2018. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

Who we are

Outside the Box are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

We are not required to have a Data Protection Officer. However, for further information about our privacy practices, please contact our Data Protection Lead by:

- Writing to Outside the Box, 2-4 Bridge Lane, Ilkley, LS29 9HN
- Calling 01943 431173
- Emailing cafe@outsidetheboxcafe.com

Data Protection Principles

We will comply with Data Protection Law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any other way
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

How we collect information about you

We collect information from you in two main ways; directly and indirectly.

What does directly mean?

This could be if you

- Ask us about our activities

- Sign up for a programme or project
- Apply for a job or volunteering opportunity
- Accurate and kept up to date
- Otherwise provide us with your personal information

This includes when you phone us, or get in touch through the post, or in person.

What does indirectly mean?

When you interact with us through third parties: This could be if you provide a donation through Local Giving and provide your consent for your personal information to be shared with us, or if someone names you as an emergency or financial contact.

Information we collect and why we use it

Personal information we collect might include details such as your name, date of birth, email address, postal address and telephone number, health information and any other information you provide in any communications between us. You will have given us this information whilst signing up to a taster, an OTB programme or project, applying for a job or volunteer placement or any of the other ways to interact with us.

We will mainly use this information:

- To provide the services that you, or someone who has named you as a contact, have signed up for
- To update you with important information about services
- To maintain a business relationship
- To keep a record of your relationship with us
- To process your job or volunteer placement application
- To process your donations or other payments, to claim gift Aid on your donations
- To comply with the Charities (protection and social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.

If you do not provide this information, we will not be able to provide the service you have requested, keep you updated about services or process your job or volunteer placement application.

We may also use your personal information:

To contact you about our work and how you can support Outside the Box (see "Marketing" below)

Photos

If you sign up to an outside the box service or a project we will ask for your consent to take photographs of you for your file, social media and marketing purposes. You can withdraw your consent at any time by contacting us:

- Writing to Outside the Box, 2-4 Bridge Lane, Ilkley, LS29 9HN
- Calling 01943 431173
- Emailing cafe@outsidetheboxcafe.com

Special Category Data and Criminal Offence Data

Data Protection Law recognises that some categories of personal information are more sensitive. Special Category Data can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you attend an OTB Service or a project, we need to collect some special category data about you so that we can keep you safe. We will also ask about any previous convictions you have; any information you give us will be handled in accordance with Data Protection Law.

If you attend our OTB projects or apply for a job or volunteer placement we will also collect some special category data so that we can make sure that what we do is in line with the Equalities Act. Any information collected will be anonymised and handled in line with Data Protection Law.

We will only use this information:

- For the reasons mentioned above
- We will not pass on your details to anyone else without your express permission

Legal basis for using your information

In most cases, we will only use your personal information because we need to use it in order to fulfil a contract with you (for example, because you have signed up to programme or project), or where we have your consent (for example for taking photos of you).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Outside the Box to process your information.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your personal information are where you have contacted us or we have worked with you previously and wish to approach you about a new opportunity, use your personal information for data analytics, improving our services, or for legal purposes (for example, dealing with complaints and claims).

Marketing

We will only contact you about our work and how you can support Outside the Box by phone, email or text message, if you have agreed for us to contact you in this manner.

You can withdraw your consent at any time by contacting us: cafe@outsidetheboxcafe.com / 01943 431173 or by emailing requesting to be taken off any mailing lists

Sharing your Information

The personal information we collect about you will mainly be used by staff and volunteers at Outside the Box so that they can support you. We may use carefully selected companies to provide services

on our behalf, including storing files and recording financial transactions. We will only provide those companies with the information they need to deliver the relevant service, and we make sure that your data is treated with the same level of care as if we were handling it directly. We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

If you are taking part in a funded project then we may share your personal information with the funders as part of our contract with them. We will tell you about what we'll be sharing, and who with, when you sign up.

Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our Data Protection Lead:

- Writing to Outside the Box, 2-4 Bridge Lane, Ilkley, LS29 9HN
- Calling 01943 431173
- Emailing cafe@outsidetheboxcafe.com

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information 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. You also have the

right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Questions?

If you have any questions or want to find out more, please contact us by:

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