###### **PRIVACY NOTICE**

***Gladrags Community Costume Trust Registered Charity Number 1122704***

###### This policy explains how Gladrags collects and uses the personal data you provide to us whether online or via phone, mobile, e-mail, letter or other correspondence, in accordance with General Data Protection Legislation (GDPR).

**Why and how do we collect and process your personal data?**

* Personal data is collected in order to keep in touch with you in accordance with, and about your particular relationship to Gladrags, including: provision of services; contractual agreements; donations and other forms of payment.
* We collect the minimum amount of data we need in order to do this and the information is collected directly from you when you complete and return forms as part of communicating with Gladrags *e.g. volunteering, membership, costume hire, making a donation in the store or online.*
* Where you have given your explicit consent, we will additionally collect:
* name and contact details to tell you about our charitable work; special events; fundraising and ways of getting involved with Gladrags. For more information please ask to view our *GDPR Mailing List Consent Form.*
* images/ audio/ video footage of yourself to:

 - celebrate, promote and raise awareness of our charitable work.

 - evidence our work in order to apply for funding and report back to funders.

For more information please ask to view our *GDPR Images-Audio-Video Consent Form.*

 **What type of information is processed?**

The personal data that we collect in this way will typically include your name, telephone number, email, and sometimes postal address. Where we have your consent, we will also collect testimonials from you about the impact of Gladrags on your project.

Information we process by category of relationship to Gladrags:

* Service Users – name and contact details. With explicit consent: testimonials; images, audio, video footage.
* Members – name and contact details. With explicit consent: testimonials; images, audio, video footage.
* Out-reach participants – anonymised statistical data regarding gender, age, special education need and socio-economic context. With explicit consent: testimonials; images, audio, video footage.
* Donors - Gift Aid donations that require completion of a form: name and contact details, including postal address, as is required by law to set up the mandate.

Other donations: name and contact details where we have obtained your consent.

* Volunteers – name and contact details, including references and emergency contact details; DBS status where applicable; statistical data regarding gender, age, nationality, employment or education status, special needs. and socio-economic context. name and contact details. With explicit consent: testimonials; images, audio, video footage.
* Trustees - name, date of birth and contact details, DBS status, bank account information. With explicit consent: testimonials; images, audio, video footage
* Employees and Sessional Workers – name and contact details, bank account details, payroll information, emergency contact details. With explicit consent: testimonials; images, audio, video footage.
* Applicants for posts - name and contact details, CV and related information, including references and their contact details.
* Suppliers - name, contact details, bank account details.
* Online visitors - anoymised statistical data concerning the way our online platforms are used, including the visitor’s country, the pages viewed and the date of the visit.
* Online shoppers and social media visitors - individual user names, which are transferred to our online platforms via facebook, instagram, twitter, ebay and etsy. All these online providers hold their own privacy policies which you should read before accessing their services.

Feedback: we may record and store your voluntary feedback and contributions to surveys and questionnaires.

In some cases we may collect information that the Data Protection Act considers to be sensitive (this could include details of ethnicity or religious beliefs). Such information will only be collected and retained with your specific consent.

Enquiries: we do not collect personal data from phone calls, text messaging, our website contact forms, or any other enquiry correspondence methods unless the enquiry becomes a relationship to Gladrags, as described above.

**Who processes your information and how is it stored?**

* The information is processed by employed staff, volunteers and trustees, in accordance with their roles within the organisation.
* Your data is stored securely on password protected computers and paper files in locked secure cabinets at our place of work. Computer data is backed-up via cloud storage solution.

Please ask for a copy of our data protection policy for further information about our file security procedures, and how we ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure.

**How long will we keep your information for?**

We will retain your information for as long as you have an active relationship with Gladrags. If you cease to have an active relationship with us or request to receive no further contact, we may retain some basic information in order to collect statistical data, avoid sending you unwanted materials in the future, and to ensure that we don’t accidentally duplicate information.

For detailed information about our file retention plan, please ask for a copy of our data protection policy.

**How do we dispose of personal data?**

At the end of the administrative life of the record it is disposed of in a secure manner. For further information regarding disposal arrangements for different forms of personal data, please ask for a copy of our data protection policy.

**How do you stop receiving communications from us?**

Where interacting with you is based on your consent, you have the right to withdraw this at any time. You can email or message Gladrags at any time to be removed from the relevant mailing list, or to halt the use of new images, audio or film footage of yourself.

**Do we share or sell your personal data?**

We will not sell your personal data to third party organisations, and we do not share your personal information with third parties, unless required by law to do so.

**What are your rights?**

You have the right to:

* be informed about and request access to the personal data Gladrags holds about you, including requesting a copy of the data
* request that your personal data is amended if it is incorrect or incomplete
* request that your personal data is restricted, where this does not interfere with the needs of a contractual or service agreement
* withdraw a consent you have previously given for your data to be processed and used (where consent is applicable)
* ask us to remove your personal information from our records where there is no compelling reason for it to held by us
* object to the processing of your information
* raise a concern or complaint with the Data Controller about the way in which your information is being processed or used. If you are not satisfied with our response, you can make a complaint to the Information Commissioner's Office (ICO) on 0303 123 1113 (Mon - Fri 9am - 5pm)

**Who is responsible for data protection and who can I contact?**

**The data controller is**: Vania Mills, whose role is to determine why and how personal data is processed and stored. She can be reached at: vania@gladragscostumes.org.uk 01273 609184

Gladrags, Unit 10, Westergate Business Centre, Westergate Road,
Brighton BN2 4QN.

Overall responsibility for personal data rests with the Gladrags’ Board of Trustees, who oversee the implementation of the data protection policy.

**The data protection officer is:** Nigel Watson, whose role is to oversee and monitor our data protection procedures and ensure we are GDPR compliant. He can be reached at: nigelwatson@coldean.brighton-hove.sch.uk 01273 294914

### **Coldean Primary School**12 Kenwards, Coldean, Brighton, BN1 9EN

 **Where can you find out more information?**

* If you would like to find out more information about how we collect, use and store your personal data, please contact the data controller.
* For legislative information about the privacy of personal data:

[**ICO WEBSITE**](https://ico.org.uk/) [**EU General Data Protection Regulation 2018 (GDPR)**](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC)

## Changes to our Privacy Policy

This privacy policy may change from time to time in line with legislation or organisational developments. An updated policy will be available on our website.

May 2018   -        Privacy policy instigated