

The image features a central illustration of two hands holding a smartphone. The hands are rendered in a simple, flat style with brown skin tones and blue sleeves. The smartphone is grey with a black screen. The background is a light grey triangle pointing downwards, set against a vibrant pink background. The text 'centre' is written in a large, white, lowercase sans-serif font, with the 'c' being a stylized copyright symbol. Below it, 'Privacy policy' is written in a smaller, white, lowercase sans-serif font.

# centre

Privacy policy

Date these procedures came into effect: 28/04/2021

Date these procedures must be updated by: 01/01/2022

Written by: Torrin Wilkins.

**Welcome to our Privacy Policy:** Welcome to our new, simplified, privacy policy. In this privacy policy, Centre is referred to as "us", "we", and "our". This privacy policy also only refers to Centre as an organisation and only applies if we are the data controller for centreuk.co.uk. Whilst we have links to Facebook, Twitter, Instagram and YouTube accounts, each have their own separate privacy policies.

**This document sets out:** In this document you will find out how we collect data from people, how we get permission to have that data, how we can share it inside and outside of Centre, how we keep it and where, how long we keep it for, your rights over it, how to use those rights, how to contact us, our cookies policy and how we may change this policy.

**Who is covered by this policy?** This policy is applicable to all members of Centre. This also includes the: Administration, Spokespeople, Regional/State Chairs, members of Young Centre and members of the public.

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## **What data we collect and how we collect it:**

By consenting you agree to Centre using that data as set out in the rest of this privacy policy. Please do not send us the data of other people unless you are asked to.

**Join:** When you give us your first name, last name, email address, whether you are over 18 and any regional branch you would like to join when you fill in the form to be a member of Centre on the 'Join' page.

**Contact:** When you give us your first and last name, email address and any comments.

**Safeguarding procedures:** For safeguarding procedures this can include the name of the person raising the concern, their email address, what relationship they have with the person who they are raising the concern for, whether the person who is raising the concern is a member of Centre, whether they would like to remain anonymous, whether they are a vulnerable adult, whether they are under 18, if they are a member of Centre, details of the safeguarding concern, whether there is additional evidence they would like to pass on, whether there is a police investigation ongoing into the issue or social services have been contacted, whether they agree to our privacy policy and any information collected by the member of our Safeguarding and Complaints Team investigating the complaint.

**Complaints procedure:** For the complaints procedure this includes your name, email address so you can be kept up to date with the process, whether you are a member of Centre, whether the complaint happened to you or someone else, whether you would like to remain anonymous, whether you have done anything to try and resolve the issue, the categories the complaint falls under, an explanation of the complaint, the URL of the post if it is a social media post, whether there is currently a police investigation into the issue, whether there is any additional evidence in the case, the name of the person you would like to make a complaint about, how old they are, whether they are a member of Centre, what region they live in, what position they hold, what you would like to see happen with your complaint, whether it is a joint complaint, whether you agree to our privacy policy. any information collected by our Head or Deputy Head of Complaints, if your complaint is an appeal and Complaints Team investigating the complaint.

**Whistleblowing policy:** For the whistleblowing policy this includes your name, contact details such as an email address so you can be kept up to date with the process, whether you are a member of Centre, whether you would like to remain anonymous, whether you have a personal interest in the issue, any extra information on any personal relationship you may have with the issue, an explanation of the issue, whether there is a police investigation into the issue, what they would like to see happen as a result of the report, if there is any additional evidence of the issue, whether it is a joint report, if it is a joint report the people filing it alongside you, that you agree to our privacy policy, whether the report is an appeal and any information collected by the member of our Complaints Team investigating the complaint.

**Investigations into minor issues:** For Investigations into minor issues this can include your name, email address so you can be kept up to date with the process, whether you are a member of Centre, whether the issue is about you or someone else, whether you would like to remain anonymous, whether you have done anything to try to resolve the issue, an explanation of the minor issue, URL of the post if it is a social media post, any additional evidence you want to send us, the name of the person or people you would like to raise the minor issue about, how old they are, whether they are a member of Centre, what region they live in, what position they are in, what you would like to see from the minor issue being raised, whether it is a joint report, who is making the report with you, whether you agree with the privacy policy and any information collected by the member of our Safeguarding, whether it is an appeal and Complaints Team investigating the complaint.

**Papers and images of our team and descriptions of our team:** Members of our team supply us with images or descriptions of themselves along with papers they have written to be placed on the website.

**Donations:** Through PayPal we collect your: Address lines 1 and 2, town/city, postcode, county, phone number, email address, first name and last name.

**Campaigns:** First name, last name and email address.

## **How we obtain permission to use your data:**

**Join:** To submit this form, you must tick a box which means you consent to our privacy policy. Under GDPR this is under article 6 (a) through consent and 6 (b) through entering into a contract.

**Contact:** To submit this form, you must tick a box which means you consent to our privacy policy. Under GDPR this is under article 6 (a) through consent and 6 (f) for legitimate interests.

**Safeguarding procedures:** We will try to obtain consent before reporting of safeguarding issues. This is under GDPR article 6 (a) using consent. However, if consent cannot be acquired it may still be necessary to report issues to the police or social services under the law.

**Complaints procedure:** Consent is given by submitting a complaint with the line “By sending this email I agree to the Centre Privacy Policy”. Under GDPR, this is under article 6 (a) through consent and 6 (f) for legitimate interests.

**Whistleblowing policy:** For submitting a whistleblowing concern, consent is given by submitting a complaint with the line “By sending this email I agree to the Centre Privacy Policy”. Under GDPR, this is under article 6 (a) through consent and 6 (f) for legitimate interests.

**Investigations into minor issues:** For submitting a minor issue consent is given by sending an email with the line “By sending this email I agree to the Centre Privacy Policy”. Under GDPR this is under article 6 (a) by using consent and 6 (f) for legitimate interests.

**Papers and images of our team and descriptions of our team:** We will obtain consent before using your image or description on our website or our papers. Under GDPR this is under through article 6 (a) by using consent.

**Donations:** You give us permission to use your data by submitting it through PayPal. Under GDPR this is under through article 6 (a) by using consent and 6 (f) Legitimate interests.

**Campaigns:** To submit this form, you must tick a box which means you consent to our privacy policy. Under GDPR this is under article 6 (a) which is based on consent.

## **How we use this data and sharing your data within our organisation:**

Date you send to us will only be accessible by members of the Centre team listed on the 'our team' page of the website. This includes the Administration, Spokespeople and Regional/State Chairs.

**Join us:** Data submitted through the 'join' page will be used to contact you via your email address through the Centre mailing list. This allows us to update members on the activities of the group, to check for duplicate membership applications and regarding complaints we receive against, by or involving you. We may also contact you about a regional or state branch you have asked to join and pass you to a member of the centre team regarding this. If you tick the "under 18" box this information will only be seen by the safeguarding heads, the Director and the Head of Membership and Development.

**Contact:** If you send us an enquiry, we will use your email address, first name and second name to reply to you and the comment to understand what issues you are having, any other concerns mentioned or to respond to article pitches. We will not use your email address for any other purpose than to reply to your enquiries if sent to us through the 'comments' page.

**Complaints, whistleblowing complaints and minor complaints:** Complaints, whistleblowing complaints, minor complaints and safeguarding issues may be sent to other members of our Safeguarding and Complaints Team. This will be where necessary under our complaints Procedure and our safeguarding procedures. For a full breakdown see our complaints procedure, investigations of minor issues document and whistleblowing procedures. We will email you to keep you up to date with your report until it has gone through our procedures. This may include an acknowledgement that your report has been received, updates on any investigations, any questions our complaints team may send you and the outcome of our report.

**Safeguarding issues:** Reports of issues may also be sent to other members of our Safeguarding and Complaints Team along with the original member or members who found the issue. For a detailed breakdown of where your data would go please see our "Safeguarding Code of Conduct and Procedure" on our websites "Key Documents" page.

**Papers and images of our team and descriptions of our team:** This data will be placed on our website and our papers. This will mean it is available to the public.

**Donations:** Your information will only be used to check you are a UK resident, to process your payment, to deal with any refunds if necessary, to contact you about your donation, to tell you about our fundraising and respond to any issues you may have. We may also check your details against public information such as the Land Registry and Companies House.

**Campaigns:** This information will be used by our team to send regular email updates about the campaign.

**We may also use your data for:** dealing with or defending against legal claims or if we must share it by law.

### **Sharing your data with third parties:**

If necessary; Complaints, whistleblowing complaints, minor complaints or safeguarding issues may be reported to the police, social services parents, carers, other members of the Centre complaints or safeguarding teams where necessary under our procedures.

Complaints, minor complaints, whistleblowing or safeguarding issues of any severity may also be handled by the Centre member that first comes across them who then must report it to a member of the Safeguarding and Complaints team.

Data you send to us via PayPal will not be shared with any third parties although PayPal itself will process that information when you send it to us through them.

**We may also use your data for:** dealing with or defending against legal claims or if we have to share it by law.

### **Storing your personal data:**

Our website is hosted by <https://wordpress.com/> using Automattic, Inc which is where your data will be initially stored. Automattic, Inc is based in the United States. This is covered by an EU decision on the "...adequacy of the protection provided by the EU-U.S. Privacy Shield".

After this, it will then be moved onto our offline database. For complaints, minor issues, whistleblowing reports and safeguarding issues, these will all be stored on a password protected Excel document by either the Head or Deputy Head of Complaints.

## **How long we keep personal data:**

Overall, we only keep your data for as long as is needed. However, we may keep your data for longer than set out below if required to by law.

**Join page:** If you send us your first name, last name, email address and whether you are under 18 through our 'join' page we will keep this information for a minimum of one week and a maximum of one year. The minimum time period of one week is the amount of time it will take to delete the information we have from you. The maximum time limit is how long membership lasts; once this has expired, we will ask you to renew your membership. If you tick the "under 18" box or select a regional or state branch this information will be kept until you cancel your membership, or your membership expires.

**Contact page:** Your first name or last name, email address and any comments you send via the 'contact' page will be deleted a maximum of a week after you have sent them to us and a minimum of three days after you have sent them to us. This is to allow us to look back over your previous comments, so we understand what issues you are having when messaging us.

When you send us an article to publish on our site it will remain on the site a minimum period of a week. As this will be public information, we will not delete this information unless you request us to do so.

**Papers and images of our team and descriptions of our team:** Any images of you or descriptions you have provided to us will be kept on our website until you either leave the Centre team, in which case we will remove them within a month, or until you ask for them to be removed. We can also remove your picture or description from papers. For other items such as videos, contributions to papers, blog posts or other material produced for Centre this material can be used as it was produced for Centre so long as it does not include the person who has left the organisation.

**Complaints, minor issues, safeguarding and whistleblowing:** Information given to us for complaints, for safeguarding, as a whistleblower or for a minor complain will be anonymized by either the Head or Deputy Head of Complaints or the Head or Deputy Head of Safeguarding. Any data that has not been anonymized will be deleted once the Safeguarding or Complaints procedure has been carried out in full. The maximum period of time we keep records, anonymized or not, is four years. After four years all records will be deleted.

**Donations:** We will keep this information for a minimum of one week and a maximum of three months. The minimum time period of one week is the amount of time it will take to delete the information we have from you. The maximum time limit is how long it could take us to process a more complex donation.

**Campaigns:** We will keep this information for a minimum of one week and a maximum of four months. The minimum time period of one week is the amount of time it will take to delete the information we have from you. The maximum time limit is how long our campaigns last.



## **Your rights over your personal data under GDPR:**

[Right of access by the data subject](#), this gives you the right to find out what data we are processing on you, why and how long we will have it for.

[Right to rectification](#), this gives you the ability to change data we have on you if it is inaccurate.

[Right to erasure \('right to be forgotten'\)](#), this means we will remove all of your personal data that we hold.

[Right to restriction of processing](#), this allows you to limit how we process your data.

[Right to data portability](#), this allows you to move your data to another data controller.

[Right to object](#), this means you can tell us to stop processing your personal data.

[Right to lodge a complaint with a supervisory authority](#), this means you can lodge a complaint with a supervisory body if you have a complaint.

[Conditions for consent](#), in this section of GDPR legislation it allows you to withdraw consent for your data to be used.

For more on these rights, you can see here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## **How to use these rights:**

To use any of these rights, please let us know using our contact details section.

- You can opt-out of emails from our newsletter at any time and we will delete your email address by sending us an email address with the email subject line 'unsubscribe'.
- To leave the group as a whole which will involve us deleting all of your personal information stored by us send an email with the subject line 'cancel membership'.
- Send us a message to opt-out of emails.

## **Contact details:**

You can email us at [centreuk@centreuk.co.uk](mailto:centreuk@centreuk.co.uk) or you can phone us on 07802781382.

## **Cookies:**

“A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website”.

- Persistent cookies: Cookies that are stored on your browser until you delete them, or they reach their end date at which point they will be deleted.
- Session cookies: Cookies that will be deleted when you end your web session.

How to control cookies using browsers:

For Firefox you can use: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

For Safari you can use: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For Opera you can use: <https://help.opera.com/en/latest/security-and-privacy/>

For Internet Explorer you can use: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

For Chrome you can use: <https://support.google.com/chrome/answer/95647>

For Edge you can use: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

More information: <https://aboutcookies.org/>

You can see cookies used by our website here: <https://automattic.com/cookies/>

This website also contains links or embedded material from other sites, you can find their privacy policies here:

Facebook: <https://www.facebook.com/about/privacy>

Twitter: <https://twitter.com/en/privacy>

Instagram: <https://help.instagram.com/155833707900388/%22>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

YouTube: <https://policies.google.com/privacy?hl=en-US>

PodBean: <https://centristpodcast.podbean.com/>

**Changes in this policy:**

If we change this policy, then it will be updated on our website and then we will contact our members via email.