

## Creative Sustainability CIC Privacy Notice

### ***Our contact details***

Name: Creative Sustainability CIC

Address: 7 Fromehall Mill, Lodgemore Lane, Stroud GL5 3EH

Phone Number: 0747 999 9919

E-mail: Coryn Memory [coryn@cscic.org](mailto:coryn@cscic.org)

### ***What type of information we have***

**We** currently **collect** and **process** the following information:

- Personal identifiers, contacts and characteristics (for example, **name, address, phone numbers, e mail addresses, date of birth.**)
- Some projects keep information on a person's **medical conditions** if relevant
- Details of **emergency contact person**
- Details **of other agencies and referrers associated with you**
- Details of any **disabilities** and what support is required
- **Employees PAYE, bank and pension** information
- Some projects collect data on your **marital status, care package status, ethnicity**, if you are a **carer**
- Some projects collect **your G.P.s name and address**
- **Photograph of you**

### ***How we get the information and why we have it***

Most of the **personal information** we process is **provided** to us directly **by you** for one or more of the following reasons:

- To enable us to **contact you**
- To **contact another person** in an **emergency**
- Relevant **medical information** to help us deliver **the best service for you**, e.g. 1-1 stroke peer support and also to **help you quickly** if you have a **medical emergency** when partaking in an activity with us.
- **Disabilities information** so we can make sure you get **the support you need** from us
- **PAYE, bank and pension** info so we can process your **salary and expenses**

Creative Sustainability is a not-for profit community interest company working with schools and communities across Gloucestershire. Company No. 7407799. 2 Model Cottages, Stroud GL6 7DN.

- Data on your **marital status, care package status, ethnicity**, if you are **a carer**, so we can supply **anonymous data** to **our financial donors**
- **G.P. info** in case of a **medical emergency** when participating in activities with us
- **Photographs** for **publicity**

We also **receive personal information indirectly**, from the following sources in the following scenarios:

- **A person or organisation** that has **referred you** into one of our services, with your consent, to **enable you** to **participate** in CSCIC activities

Under the **General Data Protection Regulation (GDPR)**, the **lawful bases** we rely on for **processing** this **information** are:

**(a) Your Consent** Your consent **will be sought** to **hold** your **personal data**. You have the **right to withdraw** that **consent** at any time. Please **contact us** if you would like to withdraw consent.

**(b) We have a contractual obligation.** This relates to **contracts** drawn up **between CSCIC and employees, volunteers** and third party **referrers**.

**(c) We have a legal obligation.** This mainly relates to **children, vulnerable adults and employees**. For example we need to process some data to **safeguard people** and keep them **safe and well**. We also have legal obligations regarding **employees' data**.

**(d) We have a vital interest.** In the case of **medical information**, we sometimes need to keep this in order to **protect people medically**, for example data about someone's **medicine** they need when in our care, or **allergy information**.

**(e) We have a legitimate interest.** This means the information we hold about you helps us to **carry out our services to you**. We also use it to provide **anonymized data for fundraising and reporting to funders**.

**(f) Medical and health information is subject to Article 9(2) of the GDPR:** This means that in addition to (a) – (e) when we process **health information** about you **CSCIC** will also **process information** according to **an extra lawful basis**. The processing of this data has to be used for the purposes of **preventive** or **occupational medicine**, for the **assessment** of the **working capacity** of the **employee**, the provision of **health or social care services**.

The **processing** of an **individual's data** may fall under **1 or more lawful bases**.

### ***What we do with the information we have***

We **use** the **information** that **you** have **given us** in order to:

- **Provide a service** which is **appropriate** to you by **sharing relevant information** with members of **staff** and **volunteers**.
- Keep you **safe and well** by **sharing relevant medical information** with appropriate **staff** and **volunteers** working with you
- **Contact you** or your **parent/guardian** or **emergency contact**
- Handle **financial transactions** such as salary and expenses, pension, PAYE by **sharing information** with **HMRC**
- We may use **photographs**, if **you have given consent**, for **publicity** purposes in **newspapers, newsletters** etc both in **print** and **online** and on our **social media**
- We use **anonymised data** to **report** to **funders** and for future **fundraising**

We may **share** this information with **other organisations** which **you** have **consented** to.

### ***How we store your information***

Your information is **securely stored** in **locked filing cabinets, password protected electronic devices, encrypted and password protected data sticks and online servers**.

**We keep** your personal information for the **duration** of **your involvement** with **CSCIC**. In the case of **ad hock** or **"on hold"** involvement we will keep your information for up to **1 year** after **our last contact** with you. We will then **anonymise** the **data or dispose** of your **information** by **shredding** paperwork and **permanently deleting** **electronically stored data**.

### ***Your data protection rights***

Under **data protection law**, you have **rights** including:

**Your right of access** - You have the right to **ask us for copies** of your **personal information**.

**Your right to rectification** - You have the right to **ask** us to **rectify** information **you think** is **inaccurate**. You also have the right to **ask** us to **complete information** you think is **incomplete**.

**Your right to erasure** - You have the right to **ask** us to **erase** your personal information in **certain circumstances**.

**Your right to restriction of processing** - You have the right to **ask** us to **restrict** the **processing** of your information in **certain circumstances**.

**Your right to object to processing** - You have the the right to **object** to the **processing** of your personal data in **certain circumstances**.

**Your right to data portability** - You have the right to **ask** that we **transfer** the **information you gave us** to **another organisation**, or to **you**, in **certain circumstances**.

You are **not required to pay** any charge for exercising your rights. If you **make a request**, we have **one month** to **respond** to you.

Please **contact us** at :

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if you wish to make a request.

### ***How to complain***

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113