Staff & Members Privacy Policy

This privacy notice tells you what to expect us to do with your personal information as a member or employee.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- How to complain

1) Contact details

Post

Coombeswood Canal Trust, Hawne Basin, Hereward Rise, HALESOWEN, West Midlands, B62 8AW, GB

Telephone

01215501355

Email

coombeswood@btconnect.com

2) What information we collect and use, and why

Trust membership, staff recruitment, administration and management

We collect or use some or all the following personal information as part of Trust membership, staff recruitment, and general administration and management:

- i. Contact details (e.g. name, address, telephone number or personal email address)
- ii. National Insurance number
- iii. Copies of passports or other photo ID
- iv. Copies of proof of address documents (e.g. bank statements or bills)
- v. Next of kin or emergency contact details
- vi. Employment history (e.g. job application, employment references or secondary employment)
- vii. Education history (e.g. qualifications)
- viii. Performance records (e.g. reviews, disciplinary records, complaints or disciplinary action)
 - ix. Training history and development needs
 - x. CCTV footage or other recordings

3) Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- i. **Your right of access** You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- ii. **Your right to rectification** You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- iii. **You right to erasure** You have the right to ask us to delete your personal information.
- iv. **Your right to restriction of processing** You have the right to ask us to limit how we can use your personal information.
- v. **Your right to object to processing** You have the right to object to the processing of your personal data.
- vi. **Your right to data portability** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- vii. **Your right to withdraw consent** When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

4) Our lawful basis for the collection and use of your data

Our lawful basis for collecting or using personal information as part of Trust membership, staff recruitment, administration and management are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The Trust has to maintain records of the individual members and their boats, boat insurance and safety certificates. The Trust has to maintain records of all employees.

5) Where we get personal information from

We collect your information from the following places:

- i. Directly from you
- ii. Employment agency
- iii. Referees (external or internal)

6) How long we keep information

The Trust retains personal paper and electronic information for a period of two years from the date an individual ceases to be a member or employee except where information is required to be retained for tax or similar purposes.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

7) How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint