

## Redruth Bookfeast Privacy Policy

We understand that the privacy and security of your personal information is an important issue to you. There are a number of ways in which you might share your information with us and we are committed to protecting your privacy. We have developed this Privacy Policy to explain the ways in which we might use your personal data, what we do to keep it safe and the extent to which we share it.

### Scope

At Redruth Bookfeast we are committed to protecting your privacy. This Privacy Policy (**Policy**) is prepared in compliance with the requirements of the Data Protection Act 1998, as replaced and superseded by the General Data Protection Regulation (EU) 2016/679, as in force from time to time (**Data Protection Law**). If you have any queries about this Policy or how we use your personal data, please contact us using the details at the end of this Policy.

We have developed this Policy as we understand that the privacy and security of your Personal Data is an important issue to you. We are committed to protecting the privacy of everyone who shares their data with us, however that may

be. Examples of how you interact with us might be as a visitor to this website [www.redruthbookfeast.com](http://www.redruthbookfeast.com) (Site), through social media or responding to paper collateral as a donor, fundraiser, or a volunteer .

This Policy explains how we use the Personal Data we collect. If you do not agree with this Policy, please stop dealing with Redruth Bookfeast in any way that involves use Of data, including use of this Site.

## **What Personal Data do we collect and how do we use it?**

We collect Personal Data as defined by Data Protection Law (see the summary of definitions at the end of this Policy). The Personal Data we collect might include name, date of birth, email address, postal address, and telephone number. We record your requests for information and any feedback we receive from you. We may also collect technical information relating to your use of our Site, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

We want to ensure that your Personal Data is accurate and up to date. If any of the information that you have provided us with changes, for example if you change your email address or postal address, please let us know using the contact details at the end of this Policy.

We legally require your express consent to use your information for certain purposes, but Redruth Bookfeast also relies upon its right to hold and process data in pursuit

of its legitimate interests (ie furthering its community objectives, which may include fundraising) without always getting your express consent. Where we rely upon this we contact you, we will always remind you of your right to unsubscribe from any future contact.

By positively accepting this Policy, you consent to our processing your information for the following purposes:

- administering the Site and keeping you informed about Redruth Bookfeast activities.
- undertaking the marketing of our aims (which include fundraising), which may include marketing to you using mail and email services (Redruth Bookfeast does **not** undertake telephone marketing);
- achieving the community objectives of Redruth Bookfeast; and
- administering the activities of Redruth Bookfeast.

If you submit your Personal Data other than through the Site, we may issue you with a supplementary statement explaining further processing which it undertakes in relation to your Personal Data.

By communicating with us in person or using any media, using this Site, making a donation, or signing up to our newsletter you are consenting to our processing your Personal Data for the above purposes. If you would prefer that we do not use your Personal Data for the purposes of direct marketing (fundraising) please let us know using the contact details at the end of this policy.

If you supply any visual image or sound recording containing your personal data to Redruth Bookfeast, or if we obtain such image or recording by photographing or recording you, this image or recording may be used for the Bookfeast's marketing and promotional activities. The purpose for which we may use your image or recording will always be set out in our consent form and/or on our website.

We also gather general information about the use of this Site but we use aggregated or anonymous information which does not identify you as an individual visitor. We track which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise the way our Site is presented when users visit, to make improvements to our Site and to ensure we provide the best service for users.

## **Do we share your information with anyone else?**

**Please note that we do not share your Personal Data with any other organisation for marketing purposes.**

We will only share your Personal Data in the following circumstances:

- (if you are an online donor) with our payment processor. By paying via our payment processor you agree to accept their terms and conditions for the use of their services, including their privacy policy. We suggest that

you read their privacy policy when using their service as we are not responsible for data you share with them.

- with our contractors and suppliers who provide services on our behalf, such as our IT providers to the extent necessary to enable you to receive those services;
- with agencies whom we use to carry out online or print campaigns to help us communicate our work to existing supporters and enable us to reach new ones;
- with Her Majesty's Revenue and Customs in order to process Gift Aid claims;
- with responsible authorities if we reasonably believes that criminal activity is taking place or it believes that an individual or a group of individuals are at risk of harm, or if we are required to do so by law or as expressly permitted under Data Protection Law.

We may need to share your information with our service providers, associated organisations and agents for the purposes described above.

## **Special Categories of Personal Data**

We collect Special Categories of Personal Data (see the summary of definitions at the end of this Policy) only if permitted to do so by Data Protection Law.

We have in place additional measures to protect your Special Categories of Personal Data and their confidentiality. We will only disclose your Special Categories of Personal Data to the third parties as referred to in this

Privacy Policy or where we consider it is necessary, if we are permitted to do so under Data Protection Law.

## **Continued processing**

Redruth Bookfeast continues to process your Personal Data following your initial interaction with us, such as:

- sending you any information requested by you;
- processing your donation;
- informing you of future events;
- managing your volunteering

We retain all information in accordance with our Data Retention Policy, a copy of which is available on request.

## **Your rights**

You have the right to ask us not to process your Personal Data for marketing purposes.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You may wish to exercise this right for any reason, for example where it is no longer necessary for us to continue holding or processing your personal data you may withdraw your consent. You should note that we are entitled to and reserve the right to retain your data for statistical purposes. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.

You have a right to ask us to confirm whether we are processing information about you, and to request access to this information ('right of access').

You may ask us, or we may ask you, to rectify information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, we will inform relevant third parties with whom we have shared your data so they may update their own records.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided us with changes, please let us know using the contact details at the end of this policy.

You have a right to obtain your personal data from us and reuse it for your own purposes, perhaps for another service, without hindering the usability of the data ('right of portability'). This right does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

You have a right to ask us to restrict our processing of your information ('right to restriction') if:

- you contest its accuracy and we need to verify whether it is accurate

- the processing is unlawful and you ask us to restrict use of it instead of erasing it
- we no longer need the information for the purpose of processing, but you need it to establish or defend legal claims
- you have objected to processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.
- you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

If you would like to exercise any of your rights above, please let us know using the contact details at the end of this Policy. We will act in accordance with your instructions as soon as reasonably possible and there will be no charge.

## **Cookies**

We may use technology to track the patterns of behaviour of visitors to the Site. This can include using “cookies”, pieces of information that are transferred to an individual user’s hard drive for record keeping purposes, which make it possible to speed up your future activities at the Site and allow us to provide you with information specifically tailored to your interests. We use Google Analytics cookies which help us understand how the Site is being used so



that we can make improvements for our users. Data from this cookie is anonymous and retained for 50 months. Other cookies that we use do not save your personal information and only last until the browser is closed.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer, although this may prevent you from taking full advantage of the Site.

## **Links to other websites**

The Site contains links to other websites. We are not responsible for the privacy policies and practices or the content of any websites which are linked to the Site.

Redruth Bookfeast encourages parents and guardians to use the parental control tools available from online services and software manufacturers to help supervise their children's online activities.

## **Security and confidentiality**

Any Personal Data you send to us will be treated in the strictest confidence. We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used in accordance with our Data Retention Policy.

We are committed to protecting the security of your Personal Data. Redruth Bookfeast uses a variety of technologies and procedures to help protect your Personal Data from unauthorised access, use or disclosure.

We use a secure service when you make a donation through the Site, via a virtual gateway operated by Worldpay Online. Our online payment system is Payment Card Industry Data Security Standard compliant.

You should be aware that the use of the Internet is not entirely secure and although we will do our best to protect your Personal Data we cannot guarantee the security or integrity of any Personal Data which is transferred from you or to you via the Internet. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features such as encryption to try to prevent unauthorised access.

## **Status, approval and changes to our privacy policy**

Our registered address is Murdoch House, Cross Street, Redruth, Cornwall TR15 2BU.

This Privacy Policy has been approved by Redruth Bookfeast's Directors; it represents the standard to be applied by Redruth Bookfeast when using individuals' Personal Data.

Please check this page periodically for changes as we reserve the right, at our discretion, to change,

modify, add, or remove portions of the Privacy Policy and the Site at any time. Your continued interaction with Redruth Bookfeast following the posting of any changes to this Policy will mean that you accept such changes.

## Contact

Questions, comments and requests regarding this Policy are welcomed and should be addressed to:

[info@redruthbookfeast.com](mailto:info@redruthbookfeast.com) 01209 213807

Redruth Bookfeast, Murdoch House, Redruth, Cornwall, TR15 2BU

## Definitions

Please find below definitions of some of the terms used in this Privacy Policy for your information and assistance.

### 1. Processing

“processing” means obtaining, recording, or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organisation, adaptation or alteration of the information or data, retrieval, consultation or use of the information or data,
- disclosure of the information or data by transmission,
- dissemination or otherwise making available, or

- alignment, combination, blocking, erasure or destruction of the information or data.

## **2. Personal Data**

Personal data is:

- any data from which the identity of a living individual can be determined, either by itself or with other data processed by data controller;
- any information such as name and address, email address, telephone number and general contact details, personal data includes images on film (e.g. CCTV images), photographs and telephone voice recordings.

## **3. Special Categories of Personal Data**

Special Categories of Personal Data means personal data consisting of information as to:

- the racial or ethnic origin of the data subject;
- the data subject's religious beliefs or other beliefs of a similar nature;
- whether the data subject is a member of a trade union; genetics;
- biometrics (where used for ID purposes);
- the data subject's physical or mental health or condition; or
- the data subject's sexual life or sexual orientation.