Privacy Notice

CoLab Exeter

Configuration Management			
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1 This Privacy Notice

1.1 Overview

Our contact details are as follows:

• Name: CoLab Exeter

• Address: Wat Tyler House, 3 King William St, Exeter, EX4 6PD, United Kingdom

• **Phone Number**: 01392 202055

• Email: enquiries@colabexeter.org.uk

This Privacy Notice sets out the way in which CoLab Exeter ("we") use any personal information that is collected from you when you have engaged our services as a service user or customer, you have gone through our employment or volunteering process, and if you have engaged in our work as a supplier.

Throughout the Notice, we will make reference to 'personal data.' Personal data means information relating to an individual who can be identified, directly or indirectly, from a piece of information. Examples of personal data include but are not limited to: your name, email address, phone number and occasionally, other contact details. This Privacy Notice will set out everything you need to know about how we use your data, what data we may use, and why we use it.

We take our responsibilities under data protection legislation very seriously. You can be assured that your information will always be used appropriately, lawfully, and in line with data protection legislation. Your data will be secured securely with appropriate safeguards in place in order to protect it against unauthorised or unlawful processing and we will ensure your data is not stored for longer than it is strictly necessary to do so.

This Privacy Notice was last reviewed in September 2024.

2 What personal data do we collect and why do we collect it?

As an organisation, we process personal data only where it is strictly necessary to do so. We process different sets of personal data in different circumstances, depending on your relationships and interactions with us.

Service Users or Customers

As an individual who has engaged in our services, we may require information (some of which could be classed as personal data) to provide the services that you have engaged us for. We will require this information for the functionality of communicating with you in order to deliver our services.

The information we collect which will constitute personal data may include:

Email address:

- First name;
- Gender;
- Last name;
- Postal address;
- Telephone number.

In certain circumstances, we may need to collect sensitive data from individuals. Sensitive data is information which requires further protection under data protection legislation because if it is processed unlawfully, it can result in harm, discrimination, or similar consequences for the data subject. We take extra care in handling such types of information.

Examples of sensitive data we collect may include:

- Data concerning health;
- Date of birth;
- · Nationality;
- Photographs or videos;
- Signature;
- National Insurance Number.

Employment of Volunteer Process Data

If you apply for an employment or volunteer position with us, we may collect the following information in order to process your application and assess you. Please note that all information collected from you will be obtained directly from you:

- Email address;
- First name;
- Last name;
- Postal address;
- Telephone number; and
- Any other personal data included in the body of your CV and/or cover letter.
- All personal information relating to you from your application of employment or volunteering will be appropriately deleted after the internal processes have concluded.

3 What is our lawful basis for processing your personal data?

Organisations need a lawful basis under UK GDPR whenever they process information. We rely on the lawful bases below to process Non-Sensitive Data under the UK General Data Protection Regulation:

Lawful Basis	The purpose of collecting this personal data	
Article 6(1)(a) – Consent	Where personal data is shared with third party service providers.	
Article 6(1)(b) – Contract	Personal data collected for the purposes of employment.	
Article 6(1)(c) – Legal Obligation	Personal data is shared when it is necessary for the prevention or detection of crime.	
Article 6(1)(d) – Vital Interests	When the vital interests of data subjects must be protected in a high-risk scenario.	
Article 6(1)(f) – Legitimate Interests	Where data subjects are interacting with CoLab services, support, projects, staff, and/or volunteers.	

We rely on the following lawful bases to process Sensitive Data:

Lawful Basis	The purpose of collecting this personal data	
Article 9(2)(a) – Explicit consent	Where consent has been obtained via Consent Forms for the sharing of sensitive personal data with third party service providers.	
Article 9(2)(b) – Employment, social security and social protection	Personal data collected for the purposes of employment.	
Article 9(2)(h) – Health or social care	Sensitive personal data collected for the purposes of engaging in services and support provided by CoLab and third party service providers.	

3.1 Do we transfer your personal information outside the UK?

The safety and integrity of your personal data is very important to us. At CoLab Exeter, we risk assess each third-party supplier we use and where possible, we also ensure that all security measures and appropriate safeguards are put in place to protect your information and comply with data protection legislation.

Currently, all our third-party providers are based in the UK or EEA; therefore, we are not carrying out any international transfer of your data.

However, if for the provision of our services, we will use any third-party organisation based outside the UK or the European Economic Area (EEA), we will always ensure that the transfer of data is secure and conducted lawfully.

Transfers from the UK to the European Economic Area (EEA) are deemed lawful on the basis of adequacy regulation.

In contrast, in the event we transfer data from the UK to the United States or any non-EEA country, we will rely on one of the lawful grounds established by the UK GDPR, including the most common ones, which consist of the following:

- An adequacy decision;
- Extension to the EU-UK Data Privacy Framework;
- Standard Contractual Clauses.

4 How long will we retain your personal data for?

We will keep your information for no longer than is necessary and as required to fulfil our legal obligations. If your data is no longer needed, we delete or anonymise it where we have the appropriate lawful basis to do so.

If we rely on consent to process your personal data, then we will only retain your data for as long as you consent to us holding it.

When determining the relevant retention periods for personal data we hold on you, we will take the following factors into account:

- Our contractual obligations and rights in relation to the information involved;
- Whether we have consent to retain the personal data;
- Legal obligation(s) under applicable law to retain data for certain period of time;
- Statute of limitations under applicable law(s);
- Legal claims or potential disputes;
- If you have made a request to have your information deleted;
- Guidelines issued by relevant data protection authorities.

5 Who do we share your personal data with?

Where information is shared, it will be done on a strictly need-to-know basis and limited to what is necessary. Currently, we do not share or transfer your personal data with anyone outside of the European Economic Area (EEA).

The only third parties with whom your personal data may be shared will be third parties with whom CoLab Exter have a contractual relationship with. The table below includes suppliers which CoLab currently share your data with.

Supplier Name	Location	Purpose
Alcumus SafeHR	United Kingdom	Internal HR platform

CharityLog	United Kingdom	Cloud-based CRM
AdvicePro	United Kingdom	Case management system
Microsoft	United Kingdom	Business functions

Please note that we may be legally required to share your personal data with law enforcement agencies, regulators, courts or other public authorities.

6 Your Personal Data Rights

Data protection legislation grants individual certain privacy rights over their personal data. Please see the <u>Information Commissioner's Office's guidance for the public</u> for further information on your privacy rights, which are also listed below:

- 6.1.1 The right to be informed
- 6.1.2 The right of access
- 6.1.3 The right of rectification
- 6.1.4 The right of erasure
- 6.1.5 The right of restricting processing
- 6.1.6 The right of data portability
- 6.1.7 Rights related to automated decision-making including profiling

7 How to exercise your right

You can exercise any of the above rights by contacting us at dataprotection@colabexeter.org.uk

7.1 Timeline

We will always aim to respond to your request as soon as we can. Generally, this will be within one month from when we receive your request. We are entitled to extend the time to respond to your request where it is complex but will notify you if it is going to take longer to deal with.

7.2 Verifying your identity

In order to comply with your request, we will need to verify your identity so that we do not disclose any of your personal data to the wrong person. Therefore, we may ask for confirmation of your identity as part of the process which may include requesting further documentation and processing more personal data.

7.3 Charging a fee or refusals

We usually act on requests and provide information free of charge. However, there are exceptions. If your request is excessive, repeated or manifestly unfounded, we may charge you a reasonable fee to cover our administrative costs or refuse to act on the request.

We regularly update and review this Privacy Notice and we will ensure any new uses of personal data are brought to your attention before they are processed. You can learn more about your rights by visiting the Information Commissioner's Office's ("ICO") website here.

8 Making a Complaint

Should you have any queries about how your information is used, or wish to make a complaint about how your data has been used, please contact us at dataprotection@colabexeter.org.uk

Alternatively, you can also contact the Information Commissioner's Office (ICO), who are the UK's independent data protection supervisory authority, for further information or to make a complaint.

The ICO can be contacted in various ways, including telephone and live chat. Further information on how you can get in contact with the ICO can be found below:

Address: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone Number: 0303 123 1113 (local rate)

Online: As directed on their website at https://ico.org.uk/make-a-complaint/