



# Privacy Notice

This Privacy Notice provides details of what to expect when Pembrokeshire Inspired collects Personal Data. It applies to all Data collected in the delivery of its Services.

Pembrokeshire Inspired is a website and a digital application ('app'). The website and the app each use identical functionality and draw information from the same database. This means that Data is shared between both platforms.

### **Definitions**

This Privacy Notice uses the following terms.

Pembrokeshire Inspired The Pembrokeshire Inspired website or app, or any of the staff, volunteers or

agents operating directly for the Pembrokeshire Inspired website or app.

Data or Personal Data Information relating to an individual, including contact details or other personal

information.

Service User Any individual or organisation that uses the Pembrokeshire Inspired website or

app.

Subscriber A Service User who has provided an email address for the purpose of receiving

regular email updates from Pembrokeshire Inspired.

Member A Service User that has a registered profile on the Pembrokeshire Inspired website

or app for the purpose of sharing events and activities, or for selling products.

Services The functionality of the Pembrokeshire Inspired website and app, provided to

Service Users.

**E-Commerce** The facility to buy or sell items through the Pembrokeshire Inspired website or app.

Third-Party An individual, organisation or other commercial entity which is not Pembrokeshire

Inspired or the Service User.

Partner Organisation A Third-Party that is working jointly with Pembrokeshire Inspired with the aim of

improving or expanding the Services offered by Pembrokeshire Inspired.

**Contractor** A Third-Party that is being paid on behalf of Pembrokeshire Inspired to deliver a

specific piece of work (e.g. research, website maintenance, etc.)

The Pembrokeshire Inspired website and app is administered by staff at PLANED. All Data collected through the delivery of Pembrokeshire Inspired's Services will be stored and maintained separately to Data collected in the course of PLANED's other activities, and will remain the property of Pembrokeshire Inspired.

# Pembrokeshire Inspired's commitment to looking after Personal Data

Pembrokeshire Inspired will:

- Maintain the privacy and security of all Personal Data it holds.
- Require that all employees, volunteers and agents acting on their behalf comply fully with Data Protection law.
- Only hold the minimum amount of Personal Data needed to allow them to perform those functions for which it is required.
- Delete Personal Data once the need to hold it has passed.
- Access and process all Personal Data in line with fair processing set out upon collecting Data from individuals.
- Design systems and processes to comply with Data Protection principles.
- Take immediate action if it is discovered that policies are not being complied with.

# What Personal Data is held by Pembrokeshire Inspired?

Pembrokeshire Inspired will hold and process Personal Data and this can include:

- Contact details, including name, address, telephone numbers and email address, where these details have been given willingly by Service Users, including Members and Subscribers.
- Personal details, in addition to contact details, including date of birth, national insurance number, etc. for purposes of employment and volunteering (volunteers and staff only).
- Data about family, dependents, next of kin or other personal circumstances for the purposes of employment and volunteering (volunteers and staff only).
- Data about criminal convictions strictly where relevant to employment or volunteering (volunteers and staff only).
- Financial Data relevant to the payment of wages, for example, bank account and tax details (paid staff only).

When Personal Data about other individuals, such as next of kin, has been provided by staff or volunteers, they should ensure that those individuals are aware of the information contained within this notice.

## How will Pembrokeshire Inspired use Personal Data?

Pembrokeshire Inspired may process Personal Data to fulfil its obligations and this can include the processing of Personal Data for any (or all) of the following purposes:

- To contact Service Users in line with the Services offered, where individuals have asked or explicitly given permission to do so.
- To directly respond to enquiries.
- For analytical, statistical and reference purposes.
- For employment and volunteering.
- To process payments and for any subsequent accounting requirements.
- To meet any other legal obligations or requirements.

## Website and app

The Pembrokeshire Inspired website and app uses legitimate Third-Party systems to collect standard internet log information and details of digital visitor behaviour patterns. This is done in order to monitor statistics such as the number of visitors and the pages visited. This Data is processed in a way which does not identify any individual. Pembrokeshire Inspired will not use this Data to make any attempt to find out the identities of individuals visiting the website or app.

Data collected through the website and app in this way is not shared with Third-Parties, including advertisers, Partner Organisations or Members.

#### E-Commerce

The online E-Commerce functionality of the Pembrokeshire Inspired website and app uses a Third-Party system to collect the relevant details of Members who are using Pembrokeshire Inspired to sell products, for the purpose of processing payments and disbursements. It also collects Data, including payment details and product delivery details, from Service Users who are making purchases in order to process the payment and deliver any goods that have been purchased. This is done in accordance with Data Protection legislation.

#### Email newsletters

Pembrokeshire Inspired will collect the email addresses of Service Users who wish to become Subscribers where they have given permission or opted in. This will be done through a Third-Party email system, and individuals will have the opportunity to make changes to their details held in the system or to unsubscribe at any time, either through a link provided in emails or by contacting the address in this Privacy Notice, below.

Pembrokeshire Inspired's Services include the publication and distribution of information about events and activities organised by Members and listed on the website and app. Pembrokeshire Inspired will not pass the contact details or other Data relating to any Subscriber (or other Service User) to any Member or Third-Party organisation.

#### Other communications

Staff, volunteers or agents acting on behalf of Pembrokeshire Inspired can also communicate directly with Service Users, Members and Third Parties in other ways when requested to do so. This will include responding to emails, in writing, by telephone and through the use of social media messaging systems.

Where any Personal Data is shared through these communications, that Data will be processed in accordance with instructions contained within the communication. Telephone calls are not routinely recorded, and callers will be notified if they are, but other communications (emails, letters etc.) may be kept securely for reference purposes.

# Who will Pembrokeshire Inspired share Personal Data with?

Pembrokeshire Inspired will occasionally need to share certain Personal Data with Third Parties, including Partner Organisations or Contractors, such as consultants, so that those Third-Parties can assist in the delivery of the Services.

Some of those Third-Parties will simply process Personal Data on the behalf of Pembrokeshire Inspired, and in accordance with instructions. In each case Pembrokeshire Inspired will only share Data to the extent that Pembrokeshire Inspired considers is reasonably required for those purposes.

Any Personal Data held will need to be disclosed, with reasonable purpose to:

- Staff, volunteers, agents and Contractors working directly for Pembrokeshire Inspired; where the Data is vital and required for them to perform their duties in line with their role.
- Pembrokeshire Inspired's Partner Organisations; strictly in line with agreed procedures and only with the aim of improving Pembrokeshire Inspired's Services.

Data shared with Third-Parties will not be permitted to be used by the Partner Organisation or the Contractor for their own purposes, including marketing.

# How long will Pembrokeshire Inspired keep Personal Data?

Pembrokeshire Inspired will only keep Personal Data for as long as it is needed in order to fulfil the purpose(s) for which it was collected, and for so long afterwards as is considered necessary to deal with any questions or complaints that may be received, unless it is elected to retain Data for a longer period to comply with legal obligations.

## Your rights

Under the Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the Data Pembrokeshire Inspired holds about you.

You can read more about these rights here: <a href="https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/">https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/</a>.

#### Access to Personal Data

Pembrokeshire Inspired will try to be as open as possible in terms of giving people access to their Personal Data. Individuals can find out if Pembrokeshire Inspired holds any Personal Data by making a 'Data subject access request' under the Data Protection Act 2018. If Pembrokeshire Inspired does hold Data about you, it will:

- give you a description of it; tell you why it is held; tell you who it could be disclosed to; and
- let you have a copy of the Data in an intelligible form.

To make a request to Pembrokeshire Inspired to see or have a copy of any Personal Data that may be held, you need to put the request in writing to the address provided below.

If you agree, Pembrokeshire Inspired can deal with your request informally, for example by providing you with the specific Data you need over the telephone.

If Pembrokeshire Inspired does hold Data about you, you can ask for any mistakes to be corrected by contacting the address below.

#### How to contact Pembrokeshire Inspired

If you want to request further details relating to anything in this Privacy Notice, please contact:

Stuart Berry, c/o PLANED The Old School Station Road Narberth SA67 7DU

Email: hello@pembrokeshireinspired.wales OR stuart.berry@planed.org.uk

Pembrokeshire Inspired may update this Notice periodically. When this happens, Service Users and relevant Third Parties will be informed of the changes and the date on which the changes take effect.

