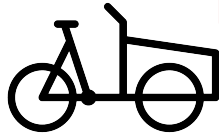


CAMCYCLE



Privacy policy

Agreed by Camcycle trustees: 25/05/2018

What this privacy policy covers

The privacy and security of your personal information is extremely important to us. So that you can be informed and confident about giving us your information, this privacy policy explains how and why we use your personal data. We take care to ensure that we use your information in accordance with all applicable laws concerning the protection of personal information.

We'll keep this policy updated to show you all the things we do with your personal data. This policy applies if you're a member, volunteer, donor, supporter, customer or employee of Camcycle or if you visit our website, email, call or write to us. We will never sell your personal data. We will not share your personal data with another organisation unless we have your specific permission to do so.

If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to contact@camcycle.org.uk or addressed to Camcycle, The Bike Depot, 140 Cowley Road, Cambridge, CB4 0DL.

Who we are

Cambridge Cycling Campaign is a charitable organisation which works for more, better and safer cycling, for all ages and abilities in and around Cambridge. Our Registered Charity number is 1138098.

In this policy, whenever you see the words 'we', 'us', 'our', 'Camcycle', 'Cambridge Cycling Campaign' or 'the Campaign', it refers to Cambridge Cycling Campaign. Our ICO registration number is pending.

What information we may collect about you

We collect information about our members and supporters. The information we gather may include:

Personal information: Name, postal address, email address, telephone number, date of birth, age, and gender where appropriate.

Your preferences: We keep a record of what you've told us about how you like to be contacted and what you'd like to receive.

Your interests: Sometimes we collect information about your interests, such as your involvement in Camcycle campaigns and events and your opinions and attitudes about Camcycle, cycling and Cambridge so we can contact you about information that is relevant to you.

Your affiliations: We may also collect and record any other relevant information you share with us about yourself, including your affiliations with community groups or your employer. For example, we may require your employer's details to process a payroll gift.

Payment information: We may collect your bank account details when setting up a regular direct debit; a credit card or debit card number when processing payments by card, and details about your taxpayer status when claiming Gift Aid.

Record of your support: We collect and process information about your interactions with us, including:

- Details about our contact with you through email, text message, post, on the phone or in person
- Details about donations you make to us
- Details about events that you register for, or attend
- Any other support you provide to us.

Sensitive information

This is personal information that is more sensitive. This includes details about a person's race and ethnicity, sexual orientation, religious beliefs, trade union memberships, political opinions, and information about their health.

Sensitive information may be collected from you if you choose to provide it to us, such as when you volunteer with us, or attend our events. For example, if you tell us about your accessibility needs or dietary requirements, you are disclosing sensitive information.

Generally, we do not collect or keep a record of sensitive information. If we do need to gather this information we only do so with your explicit consent. We have measures in place to protect your sensitive information and its confidentiality.

Photography and video

There are three main ways we capture photography and video to use in our work.

Street photography: For editorial use in illustrating articles, blog posts and other published content of public interest. Images taken in this context will not be used for membership or fundraising campaigns or other promotional use.

Event photography: To celebrate and record events we organise. We will always make it clear when we are taking photos or filming at events. Please let us know if you do not wish to be featured.

Promotional photography and personal stories: To enhance our brand identity and promote our organisation, including membership and fundraising campaigns. We will always seek explicit signed permission from those featured and, for under 18s, the permission of their parents or guardians.

We store images in a secure location and can supply copies of photos on request. It is your right to request removal of photos or video including your face from our archive or materials.

Social media

In addition to the photography and video policies listed above, on occasion we will repost images tagged with our social media handles and hashtags. In the event that Camcycle provides certain hashtags, if you choose to add those hashtags to your image, the image may be redisplayed on our social media feeds or website. While you retain ownership of the image, using the hashtags we request gives us permission to display the image. If you do not want your image posted by us, please do not tag us or use the hashtags listed. We will always seek additional permission from you for any photos or videos featuring under 18s.

Under 18s

Camcycle is committed to safeguarding the welfare of all children and young people involved in our work.

If you are under 13, we will always ask for consent from a parent or guardian to collect information about you and to continue to contact you. We may also collect the name and contact details of your parent or guardian, where appropriate.

We currently do not process individual membership applications for children aged under 18.

Where children under 18 are included in a household or other multi-person membership we will not collect their contact information and therefore we will not ask for their consent nor send marketing communications.

Cookies and third-party websites

Cookies

Cookies are small text files stored on your computer when you visit certain websites. We may use first party cookies (cookies that we have set, that can only be read by our website) to personalise your online experience. We may also use third party cookies (cookies that are set by an organisation other than the owner of the website) for the purposes of website measurement and targeted advertising. You can control the use of cookies via your browser.

Links to other websites

Our website may, from time to time, contain links to and from the websites of advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we don't accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This privacy policy applies solely to the personal data collected by Camcycle.

Recruitment and employment

In order to comply with our contractual, statutory, and management obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees. Such data can include, but isn't limited to, information relating to health, racial or ethnic origin, and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it's processed is given below.

Contractual responsibilities: Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay, leave, maternity pay, pension and emergency contacts.

Statutory responsibilities: Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

Management responsibilities: Our management responsibilities are those necessary for the organisational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, absence, disciplinary matters, email address and telephone number.

Sensitive personal data

Sensitive personal data is information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

In certain limited circumstances, we may legally collect and process sensitive personal data without requiring the explicit consent of an employee.

(a) We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

(b) We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

(c) Data about an employee's criminal convictions will be held as necessary.

Disclosure of personal data to other bodies

In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs.

In order to fulfil our statutory responsibilities, we are required to give some of an employee's personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

Our legal basis for using your information

To comply with UK data protection rules, Camcycle must have a legal justification for collecting and using your personal information.

The legal basis that we rely on will depend upon the circumstances in which we collect and use your personal information. In almost all cases, our processing of your personal information will fall into one of the following categories:

- Where you have provided your **consent** to allow us to use your data in a certain way. For example, by subscribing as a member.
- Where the processing of your personal information is necessary to carry out the **performance of a contract** with you. For example, sending you membership renewal information and keeping you informed of constitutional matters such as AGMs (Annual General Meetings)
- Where the processing of your personal information is necessary for us to comply with a **legal obligation**.
- Where it is in our **legitimate interests** to contact you in order to raise funds and achieve our cycling campaigning objectives. In doing this, we have determined that such processing is not likely to be too intrusive, or excessively infringe on your rights and freedoms.

These legitimate interests may include:

- *Operational work*: including achieving our objectives to work for more, better and safer cycling, conducting statutory and financial reporting, and ensuring regulatory compliance.
- *Administration and management*: including administration relating to volunteers and staff to comply with legal requirements.
- *Campaigning, fundraising and marketing*: including sending email newsletters and thank you letters, analysis, targeting and segmentation to improve the efficiency of our communication and manage your communication preferences and, in some cases, advertising goods and

services similar to those which you have shown interest in before. To find out more about how we process your information, or if you would like to change how we contact you, please contact us.

How we use your information

We are committed to making it convenient for you to tell us how you want to hear from us. We carefully manage the communications we send you to ensure we are contacting you in the most appropriate way. If you ask us to stop contacting you, we will, unless we are legally obliged to communicate with you.

We may use the personal information we collect from you to:

- Service your membership, including sending renewal information to members by mail and email, sending Camcycle magazines and other agreed benefits and membership communications and sending information about our Annual General Meeting. It's also used to verify you when you contact us or update your membership details online. Please be aware that member magazines and news may include advertisements, competitions and fundraising information.
- Manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include contacting you about a role you've applied for or we think you might be interested in, expense claims you've made and to recognise your contribution.
- Encourage you to take action as part of our latest campaign.
- Administer and manage any donations you may make, including data processing relating to Gift Aid claims, legacies, lottery events and raffles.
- Manage your direct marketing and communication preferences.
- Ask for your financial support, such as making a donation to support our campaigning efforts.
- Comply with our legal and regulatory obligations.
- Analyse the performance of our campaign actions and fundraising appeals.
- Provide you with information about us and the work that we do, including products and services that you've asked for or purchased.
- Keep a history of your support, including donations you have given and actions you have taken.
- Target online advertising effectively, reaching people who share similar interests and characteristics to our supporters.
- Create a record of your interests, preferences and level of potential engagement or donation.
- Organise and administer attendance at our events, such as our monthly meetings.

How we will contact you

We have processes in place to review how we communicate with you, especially in situations where you have not engaged with us for a while, or where the circumstances of how you interact with us change. Where you tell us that you no longer want our updates, we will act on this as soon as we can.

Where needed, we may contact you for administrative purposes and contractual requirements using the contact details that you have given us - for example, in relation to membership renewals, Gift Aid claims or to post you a product which you have bought from us.

For all other communications, your contact preferences will be respected:

Email: We will only contact you by email if you have given us your consent along with your email address. You can opt out of marketing communications at any time by clicking on the 'opt-out' link at the bottom of our emails or contacting our office

Text: We will only contact you by text if you have given us your consent along with your mobile phone number.

Telephone: We will only contact you by telephone if you have given us your consent along with your phone number.

Post

If you have provided us with your postal address, we may send you post unless you have told us that you would prefer not to receive such information. You can opt out of receiving marketing communications in the post from us at any time by contacting us.

Profiling and research

We may use profiling techniques to target our communications to ensure our members and supporters receive the information that is most relevant to them. We may also target our fundraising activity to make appropriate requests to those who have the means and the desire to give more. We do this in the following ways:

Due diligence

We may use your personal information to carry out due diligence on your donation. We may need to use publicly available information to conduct ethical screenings on potential donors of a significant gift to ensure our reputation is protected. This might include researching the sources of the donor's money, previous business practices and reputation.

If you choose not to have your personal information analysed for due diligence purposes, we may not be able to accept your donation.

Using publicly available information

When communicating with individuals who have given, or might consider giving, a substantial donation to Camcycle, we may seek to find out more about that individual, their interests and their motivations for giving, and may invite them to become more involved in supporting our cycling campaigning work.

We do this by collating biographical, financial, corporate and philanthropic information from a wide variety of sources, including information that is held on our supporter database and information that is publicly available. This publicly available information could be obtained by searching for current directorships listed on Companies House or relevant newspaper or media coverage about an individual.

If you would prefer for us not to use your information in this way, please contact us.

Targeted supporter communications

We want to ensure our updates are as relevant and engaging as they can be to our members and supporters, so we may tailor our communications based on what we know about our supporters' interests and experiences. This also helps us use our resources as efficiently as we can.

To successfully target our marketing communications, we may use profiling techniques including analysis of the response to previous campaigns and fundraising appeals and use of commercially-available information, provided to us at the postcode-level, to analyse geographic and demographic trends.

Who might we share your information with

Camcycle respects your right to privacy and your ability to choose how you hear from us. We do not sell your details to anyone. We do not make cold telephone calls to members of the public and we do not purchase information in order to do so.

We will, except as indicated below, only share your details with third parties if you ask us to – for example, when you sign up for our discussion forums or collaborative tools, sign our petitions, or

where we believe we are under a legal or regulatory duty to do so – for example, in a situation where we need to safeguard a vulnerable person.

Third parties

We use external service providers to help us send you communications and provide you with our services. These providers may include payment providers and software platform providers. Where needed, we would give relevant persons within these service providers access to your personal information, but only after we have conducted the necessary checks.

Everything an external service provider does is strictly governed by a contract. In addition, before we share any information with those service providers, we agree a Data Processing Agreement which confirms that the personal information we provide will only be used for the purposes we specify and will be processed in line with data protection legislation. As part of this agreement, the provider needs to comply with strict security measures, including having a secure method for disposing of personal information when it is no longer needed and having a secure process for transferring personal information - for instance, by using encryption.

Some service providers may be based outside of the European Economic Area (EEA). We ensure any data transfers outside of the EEA are compliant with relevant data protection legislation and that the processing of your personal information is protected by appropriate security measures. For example, organisations we work with who process data in the US must have verified that their data processing standards meet the EU-US Privacy Shield framework. This framework sets out clear safeguards and transparency responsibilities for US-based organisations processing the data of EU citizens.

Ensuring your information is accurate

We only hold your personal information on our systems for as long as is necessary for the purposes outlined above. We remove personal data from our systems once it is no longer required, in line with our guidelines on how long important information must remain accessible for future use or reference, as well as when and how the data can be destroyed when it is no longer needed.

The length of time each category of data will be retained will vary depending on how long we need to process it for, the reason it was collected, and in line with any statutory requirements. After this point the data will either be deleted, or we may retain a secure anonymised record for research and analytical purposes.

In certain situations, for example where a supporter has told us they are going to remember Camcycle with a gift in their will, we will retain their details so that we can effectively administer the gift and communicate appropriately with their next of kin or executor.

Your contact preferences are then recorded and updated on our secure database software. We respect your choices and will not contact you by a particular channel if your details are registered with official preference ('opt-out') services unless you have specifically given us your consent to hear from us.

Keeping your personal information safe

Camcycle has robust measures in place to ensure our physical and technical systems are secure. We take appropriate precautions to protect all personal information we keep, including using encryption and monitoring access to our secure networks and systems.

We also take care to ensure we have secure systems for processing your payment information. Our current payment service providers use a range of methods to protect your personal information including secure payment gateways, fraud screening and IP address blocking.

Despite our best efforts to protect your personal information electronically, the security of information sent over the internet cannot be guaranteed and may be illegally intercepted or changed after it has been sent. In this instance, Camcycle cannot accept liability.

Other ways we look after your personal information

Camcycle trustees, staff and relevant volunteers regularly review our data protection policies and processes through meetings and other appropriate channels where required. This is to ensure they are aware of their data protection responsibilities and our processes for keeping data safe and to update policies as and when required.

Managing your contact preferences

You can change your contact preferences at any time. This includes telling us that you don't want us to contact you for marketing purposes.

You can do this quickly and easily by:

- Clicking the 'opt-out' link at the footer of our emails to indicate that you do not wish to receive our campaigning updates.
- Contacting our office using one of the methods listed below.

If you change your preferences and ask to stop receiving our updates, we will ensure your contact information is disposed of in a secure manner.

Your data protection rights

You are in control of how we use your data and you have the right to ask us to stop processing your personal information. You also have the right to request a copy of the information we hold about you.

You are granted a number of additional rights under data protection legislation, which are outlined below:

- Where we are processing data based on your consent, you have the right to **withdraw consent** at any time.
- You have the right to **change your personal information** if it is incomplete or inaccurate.
- You have the right to **request the deletion or removal** of your personal information in certain circumstances, including where it is no longer necessary for us to hold it for the purposes for which we are processing it.
- You have the right to **restrict** our processing of your data if there is disagreement about its accuracy or legitimate usage.
- You have the right to **move, copy or transfer** your personal information easily and safely from one IT environment to another, in some circumstances.
- You have the right to **object to processing** based on legitimate interests (as described above) including profiling activity, and "direct marketing".

Please note that these rights are not exercisable in all circumstances. For example, personal data might not have to be erased if it is needed in the interests of public health, or to support legal claims, compliance and scientific or historical research.

For more information about these rights, please read the guidance issued by the Information Commissioner's Office.

Subject Access Requests

If you would like more detail or a copy of the personal information that Camcycle keeps on file about you, please request this in writing.

Anyone can make a request for a copy of the information that Camcycle keeps on file about them free of charge. We will only charge a reasonable administrative fee for this if the request itself is excessive or repetitive.

Making a complaint

Listening and responding to feedback from our supporters and members is very important to us.

You can make a complaint or raise a concern about how we process your personal information by contacting our office.

If you are not happy with how we have handled your complaint, you can contact the Information Commissioner's Office (which is responsible for upholding information rights in the UK) or the Fundraising Regulator (which is responsible for overseeing fundraising activities carried out by charities and similar organisations in the UK). Alternatively, you may choose to contact these bodies directly, regardless of whether you have raised the complaint with us first.

Changes to this privacy policy

This privacy policy may change from time to time. For example, we may update this policy to reflect any relevant changes to legislation and regulation, and any changes to Camcycle policy.

Please visit this website section periodically to keep up-to-date with the changes in our policy.

Contact Us

Please contact our office if you would like to:

- change your personal information
- change how we communicate with you
- request more detail about the personal information we hold about you and how we use it

In writing:

Camcycle
The Bike Depot
140 Cowley Road
Cambridge
CB4 0DL

Email:

contact@camcycle.org.uk