**Privacy Notice**

**Glenelly Development Trust (GDT) Limited**

**Glenelly Development Trust (GDT) Limited**, is a company limited by guarantee (NI026031) which has been in operation in the Glenelly Valley since 1991.

Glenelly Development Trust is committed to protecting and respecting your information. All those with whom we engage or associate with are very important to us. We want everyone who contacts us, attends our training, participates in our programme and projects, volunteers or works for us, to feel confident and comfortable with how any personal information that is shared with us will be looked after or used. We want to ensure you are fully aware of how that information is processed, how it is secured and who it may be shared with.

This Privacy Policy sets out how and why we obtain, use, process and protect your personal information.

In this Policy “we”, “us” or “our” means Glenelly Development Trust (GDT) Limited.

This Privacy Policy sets out the following:

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## **Who we are**

Glenelly Development Trust is a charitable organisation established for the following:

* Advance community development in, and the regeneration of, the Glenelly valley and its environs;
* Advance education and training for the public benefit by organising classes, courses and programmes;
* Relieve poverty and promote sustainable means of creating employment and training opportunities in the area of benefit;

To allow us to carry out our work it is necessary that we process personal information. In circumstances where this is required, we are committed to protecting your personal information and making every effort to ensure that it is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the EU General Data Protection Regulation 2016/679 and the Data Protection Act 2018. This means that we are responsible for and control the processing of, your personal information.

For further information about our privacy practices, please contact our Data Protection Lead by:

* + Writing to the Data Protection Lead, Glenelly Development Trust, 11b Main Street, Plumbridge, Omagh, Co. Tyrone Northern Ireland, BT79 8AA
  + Calling us on 07955238395
  + Emailing: [glenellycottages@yahoo.co.uk](mailto:glenellycottages@yahoo.co.uk)

## **How we collect information about you**

We want to make sure you receive the communications that are most relevant to you, whether that is through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention and most efficient service when you book into an event or participate in our programmes.

Much of our contact is with people booking onto training or using our services. Regardless of the way in which your personal information is collected, we will nonetheless ensure that it is treated with the utmost respect and in accordance with all or any legal requirements.

We collect information from you in the following ways:

**When you interact with us directly:** This could be if you ask us about our activities, register or attend training or an event, ask a question about our services, participate in one of our projects/programmes, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, get in touch through the post or in person.

**When you visit our website:** We do not analyse personal data when you visit our website but if you make an enquiry or sign up for an event you will be providing contact information so we can deal with your query.  This will only be shared with those who can help in response to that query or comment.  If we need to use your details for another purpose, we will always seek your explicit consent in advance.

## **Information we collect and why we use it**

Information we collect may include the following:

* Information you've provided to us (including on our website) such as name, address, contact details, organisation you work for or volunteer with, email address etc.
* Information required for the purpose of providing our services. This type of information may include sensitive personal information, such as health information (if required). Please see “Sensitive Personal Information” section below.
* Details of your correspondence, communications and connections with us.
* Publicly available information.
* Any other information provided to us by you or on your behalf.

We will mainly use this information to:

* Provide our services to you and to liaise with you generally about any programmes you have registered for.
* Communicate with you about our programmes and associated relevant information which we believe is of benefit to you. From time to time we may invite you to participate in surveys or research. For this purpose we will only contact you with your explicit consent.
* To comply with the grant terms of our funders.
* To keep a record of your relationship with us.
* Where you volunteer with us, to administer the volunteering arrangement.
* Comply with our legal obligations, for example accounting purposes.

We may also use your personal information:

* To contact you about our work
* To invite you to participate in surveys or research.

**Sensitive Personal Information**

In the course of our work we may receive information, particularly through our funded projects, about personal experiences of those who have benefited or will benefit from our funding or through our workshops and information. We will have agreements in place or receive explicit consent to process this information in order to provide our services.

If you provide us with any sensitive personal information by telephone, email or by other means, we will treat that information with extra care and ensure robust systems are in place to protect the confidentiality and security of such information.

If you would like to share your story with the media or other parties as part of our work telling people’s personal stories about mental or physical health, you can do so while remaining anonymous. The only individuals who will have access to your personal information in such circumstances would be relevant staff and volunteers within our organisation.

**A special note about the Sensitive Personal Information we hold**

Data Protection law recognises that some categories of personal information are more sensitive in nature. Sensitive personal information can include information about a person’s health, race, ethnic origin, political opinions, sexual orientation or religious beliefs.

If you contact us you may choose to provide details of a sensitive nature.

We will only use this information:

* For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
* We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
* Where you have given us your explicit consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it on our blog or in other media.
* Where there is a legal obligation on us to do so.

**Photographs**

During our events and workshops, we may ask to take your photograph, individually or in a group context. In these circumstances we will first ask your permission to do so and provide an opportunity to not be photographed or to remove consent for publication or use of a photo recently taken.

We will, at the time, explain how the images may be used and if further use is sought beyond this, we will seek your explicit consent.

## **Legal basis for using your information**

There are a number of legal basis upon which we will need to process your personal information, including the following:

1. Legitimate Interests - This means that we need to process the information in order to operate and carry on the activities of our organisation and to provide a service to you to ultimately achieve our vision. When we process your personal information based on ‘legitimate interest' we make sure that we consider your rights and interests and will not process your personal information if we feel that there is an imbalance.
2. Consent - In some cases, we will only use your personal information where we have your consent to do so, for example, for marketing purposes.
3. Legal Obligation – this is when we are under a specific legal requirement to process certain information, for example accounting purposes or money laundering requirements.
4. Contract – this is when we need to process your information to fulfill a contract we have with you or an organisation for which you work with or volunteer for, for example, because you are booking into one of our training workshops
5. Vital Interests - we will process your personal information in circumstances where we feel it is in your vital interests to do so, for example in an emergency situation or where we feel there is an immediate risk to someone's health or wellbeing.

## **Marketing**

We will only contact you about our work by phone, email or text message, if you have agreed for us to contact you in this manner.

We will only ever contact you by your stated preferred method, for example by post or email.

You can update your preferences or stop us sending you these communications at any time by contacting [glenellycottages@yahoo.co.uk](mailto:glenellycottages@yahoo.co.uk)

## **Sharing your Information**

The personal information we collect about you will mainly be used by our staff (and volunteers) so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities.

We may share information with our funders. Where personal information is shared with the funders it will be on the basis of legitimate interest, legal obligation or contract.

Your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

1. Your data will be made available to our website provider
2. The data that may be available to them include any of the data we collect as described in this privacy policy.
3. Our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA.
4. They will store your data for a maximum of 7 years.
5. This processing does not affect your rights as detailed in this privacy policy.

**Legal disclosure**

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority) or in order to enforce our grant terms and other agreements.

## **Keeping your information safe**

We abide by all data protection laws and treat information security with the utmost importance.

We have implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately, the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by any third-party sites.

Please be aware that advertisers or web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

## **How long we hold your information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations. We hold personal data in line with the Department of Health (NI) guidelines on record retention.

## **Your rights**

You have various rights in respect of the personal information we hold about you and these are set out in more detail below.  If you wish to exercise any of these rights or make a complaint, you can do so by contacting our Data Protection Lead;

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/> :

* **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access which is usually free of charge (unless the request is manifestly unfounded, excessive or repetitive).  Please make all requests for access in writing to the address provided in this privacy notice and provide us with evidence of your identity.
* **Right to object:** You can object to our processing of your personal information in some circumstances, particularly where we are relying on your consent to do so, for example for marketing purposes. Please contact us as noted above, providing details of your objection.
* **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
* **Erasure:** You can ask us to delete your personal information in some circumstances where we have no lawful basis or requirement to keep it.
* **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
* **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
* **Automated-decision making:**  Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.  However, we do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request. We will however respond to any request made within 30 days and notify you of steps taken to comply with any such request.

## **Contact us**

If you wish to speak to us about your data or to make a complaint, please contact us on any of the following and we will do our best to help:

* + Writing to the Data Protection Lead, Glenelly Development Trust, 11b Main Street, Plumbridge, Omagh, Co. Tyrone Northern Ireland, BT79 8AA
  + Calling us on 07955238395
  + Emailing: [glenellycottages@yahoo.co.uk](mailto:glenellycottages@yahoo.co.uk)

If you are still unhappy you can contact the [Information Commissioner's Office](https://ico.org.uk/) via their website at [www.ico.org.uk](http://www.ico.org.uk/)

Any queries or comments about this privacy policy or if you wish to have a copy of your information, amend, update or correct your records, please us the contact details provided in this section.

**We will occasionally update this privacy policy.  We will post a notice of any material changes on our website prior to implementing the changes and, where appropriate, notify you using any of the contact details we hold for you for this purpose.  We encourage you to periodically review this policy to be informed of how we use your information.**