

Together Culture Privacy and Data Protection STATEMENT

Introduction

This policy sets out the obligations of Together Culture C.I.C ('the organisation', 'we', 'us', 'our') regarding data protection and the rights of our members, donors, partners, suppliers, business contacts, supporters and employees ('the individual' 'you', 'your') in respect of their Personal Data under EU Regulation 2016/679 General Data Protection Regulation ('GDPR').

This statement relates to the privacy of members, supporters, marketing contacts, website users, partners and stakeholders across organisational activities and communications. The full data protection policy is available upon request.

The GDPR defines 'Personal Data' as any information relating to an identified or identifiable natural person (a 'Data Subject', the/an 'individual'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The organisations' nominated Data Protection Officer (DPO) is Ellie Breeze who can be contacted by email at ellie@togetherculture.com

Rights of the Data Subject

Together Culture recognises individuals' rights to :

- be informed that we hold their Personal Data
- access the Personal Data we hold about them
- rectify any data which is incorrect, inaccurate, incomplete or obsolete
- erase and remove data we hold about them (also known as the 'right to be forgotten')
- restrict how the data is processed and, in particular, how it is used
- obtain their Personal Data in a specific format
- object to their data being used in a specific way

- determine use of their data in relation to automated decision-making and profiling

Lawful, Fair, and Transparent Data Processing

Together Culture considers the processing of Personal Data lawful if at least one of the following applies:

- Someone has given consent to the processing of their Personal Data for one or more specific purposes, e.g. by subscribing as a member, through a form, questionnaire or email, or opt-in consent to marketing.
- The processing is necessary for the performance of a contract to which someone is a third party, or in order to take steps prior to entering into a contract with us;
- The processing is necessary for compliance with a legal obligation to which we are subject.

How we use individuals' information

The main purposes for which we collect and process the details to provide the services, goods or information that have been agreed and/or requested:

- for administration purposes (manage memberships, to keep a record of our relationship with individuals, to manage marketing and communications)
- to further our organisational aims, including fundraising activities
- to gather feedback and evaluate our work
- to enable the best possible member and supporter journey and experience
- We may use data to contact individuals by email (if they have given consent or are a B2B contact), post or phone with news and information about Together Culture that may be of interest to individuals, and about our other special events, activities, products and services. We will not use personal information in this way if individuals have opted out, unsubscribed or otherwise indicated that they do not wish to be contacted for such marketing purposes.
- See below in 'Conditions for using an individual's data' for further detail.

Consent and Marketing and Communications Preferences

We will not receive, handle or use data from third parties to send communications or direct marketing to individuals. All individuals have the right to opt out of any marketing or communications and have their preferences, and how they share their preferences, recorded and respected.

Objections to Personal Data Processing

Individuals have the right to object to us processing their Personal Data based on legitimate interests, direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes. If this is the case, we will cease such processing immediately, unless we can demonstrate that our legitimate grounds for such processing override their interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Retaining Data

We will not keep Personal Data for any longer than is necessary in light of the purpose or purposes for which that Personal Data was originally collected, held, and processed. When Personal Data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

Data Subject Access, Rectification and Removal

Individuals may make Subject Access Requests ('SARs') at any time to find out more about the Personal Data which we hold about them, what we are doing with that Personal Data, and why. Individuals can request that their data is removed ('forgotten') or rectified at any point. Individuals are encouraged to contact Together Culture with any updates or changes to their personal data.

Any individual can request to see the personal data we hold on them, and for details on how we use the data.

Any SAR, rectification, or removal requests should be made via email to the DPO. These requests are taken seriously, and individuals can expect a response within 10 working days.

Contacts

Any concerns, questions or requests regarding data should be directed to Ellie Breeze (Community Director and Data Protection Officer) at ellie@togetherculture.com

Any questions regarding the policy should be directed to Hannah Bowman (People and Governance Lead) at hannah@togetherculture.com

Please get in touch with Hannah Bowman to request a full copy of the Together Culture Privacy, GDPR + Data Protection Policy.