[**COSTA Privacy Notice**](http://www.nicva.org/nicva-privacy-notice)

**Community Organisations of South Tyrone & Areas (COSTA)**

ICO Registration Number: Z3167469.

Registered Company in Northern Ireland: NI 42832.

Registered with the Charity Commission for NI: NIC 101598.

**How to contact us**

**Data Protection Officer**

Loraine Griffin

Network Manager

Community Organisations of South Tyrone & Areas (COSTA)

President Grant's Homestead, 45 Dergenagh Road, Dungannon, Co. Tyrone, BT70 1TW.

Tel: 028 855 56880       Fax: 028 855 56881       Email: [info.costa@btconnect.com](mailto:info.costa@btconnect.com%20)

**Commitment to Data Protection**

COSTA is committed to maintaining high standards of privacy and data protection for our stakeholders and those we work with. This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. COSTA is committed to protecting and respecting your privacy. COSTA is registered with the Information Commissioner’s Office as ‘Community Organisations of South Tyrone & Areas Ltd’.

**Information We Collect**

Any information you provide will be carefully protected and stored in our secure database. We will keep your information confidential, in accordance with the Data Protection Act / General Data Protection Regulations (GDPR), except where disclosure is required by law.

**We Process Personal Information About**

* Members / Supporters.
* Service Users.
* Beneficiaries.
* Grant Recipients.
* Voluntary / Community Organisations.
* Partner Organisations.
* Contractors / Sub-contractors.
* Suppliers.
* Employees / Volunteers.
* Board Members.
* Grant Makers / Funders.

**Information We Collect About You**

The majority of our services and products are provided to employees or volunteers who are connected with organisations in the community and voluntary sector, private sector and government. To provide efficient services and support we collect and use (process) personal data:

* **Membership Records** such as your full name, email address, telephone number, job title and the organisations that you are associated and other related / relevant details.
* **Business contact information** such as your full name, telephone number, email address, job title and the organisations that you are associated with.
* **Records of your registration and attendance at events**, such as AGMs, conferences, seminars, training sessions and formal meetings that we organise or host.
* **Records of your contact and activities with us**, including emails, notes from phone calls and face-to-face meetings.
* **Records of** Information on services provided including programmes or resources that you access.
* **Records of cases we have provided support** on matters such as Governance, Training, Capacity, Funding etc.
* **Records of your subscriptions**to email bulletin products such as COSTA Newsletters, Member Bulletins, including a log of whether you open the emails and clicked on links.
* **If you apply for a job with COSTA**we collect your personal contact details and employment history, as well as equality monitoring information and unspent criminal convictions (where applicable) in completing job applications and pre-employment checks.
* **Survey responses** for our research purposes and data from completed research surveys. We use QustionPro and Survey Monkey for our own sector research surveys (and occasionally for event and training feedback). The responses we receive will have been anonymised. Privacy information is provided to survey participants;
* **Grant Scheme processing,** such as your full name, email address, job title and the organisations that you are associated with, grant application forms, monitoring forms and associated required documentation and financial details relating to your group in order to process grants.
* **Images, video and sound recordings** of events and training sessions for use in printed and electronic media, for promotional and archival purposes. ***COSTA may take photographs/video/sound recordings at events for use in printed and electronic media for promotional purposes. Some images or recordings may be selected for permanent preservation in COSTA’s Archive as a record of the voluntary and community sector activity and may be used for research, publication, education, displays and exhibitions. You will be informed of this privacy policy prior to recording.***

**How We Use Your Information**

We may use your information to:

* Provide you with information, grants, newsletters and services that you request from us or that we feel may be of interest to you, and / or were you have given permission to be contacted in this regard.
* Provide appropriate online content and improve our websites and social media.
* Contact you in relation to our surveys, audits and research programmes.
* Assist with COSTA’s organisational planning.
* Assist with maintenance of COSTA’s organisational records.
* COSTA will only share information with third parties confirmed to have appropriate data safeguards by the Information Commissioner’s Office (ICO).
* Section 75 / Equality data (always anonymised).

**Job Applicants / Employees / Volunteers & Board Members**

In very specific and limited cases as required by law (e.g. **recruitment and employment**), we also may collect and process sensitive classes of information that may include:

* Full Contact details
* Next of Kin contact details.
* Family details.
* Financial details.
* Education and Employment details.
* Physical or mental health details.
* Section 75 / Equality data.
* Information about offences / alleged offences in order to ensure the Protection of Children & Vulnerable Adults (POCVA) and to meet legal / funder / contract requirements.

**How we use your Personal Information / Purposes for Processing Information**

We use (process) your personal and organisational information to enable us to carry out our activities as a local community-based Network Charity in order to promote and provide our services to the local community and to:

* Manage registration and attendance at AGMs, training and events, and to evaluate feedback afterwards;
* provide digital products and services such as COSTA Newsletters and E-email Bulletins and our website;
* maintain records of services, advice or support that our staff have provided to you;
* Process information necessary to establish or maintain membership or support;
* Process information necessary to provide or administer activities for people who are members of our organisation or have regular contact with us or use our services;
* Keep the information while the individual is a member or supporter, or as long as necessary for member / supporter administration;
* Recruit staff, Board Members, Trustees and volunteers;
* Maintain our own accounts and records;
* Support and manage our members, service users, Board Members, Trustees volunteers and employees;
* Provide access to our services.
* Provide information to funders, suppliers, contractors and regulatory bodies.

**How We Collect Your Information**

We collect personal data from you:

* When you register to attend an event such as an AGM, conference or training session.
* When you subscribe to email bulletin services such as COSTA Newsletters etc.
* When you contact us to book a room at our conference facilities.
* When you contact us for advice, support or information or to access our services.
* When you contact us to apply for COSTA membership.
* When you attend an event either in or outside our building.
* When you visit our website www.costaruralsupportnetwork.org and you complete an online submission form.
* When you complete one of our surveys.
* When you apply for a job with us.
* When you complete a Good Practice Audit Checklist.
* When you apply for a grant i.e. DAERA Rural Micro Capital Grant Scheme.
* When you provide your details to us for inclusion on our e-mail list or database of members.

## **What are the Lawful Bases for our processing of your personal data?**

We use the following lawful bases to process personal data:

* Where it is in our **legitimate interest** to provide confirmations or updates about products or services we provide you with, such as fulfilling your request to attend events, participate in training courses, or help you with advice, information, governance, funding and support.
* Where it is in our **legitimate interest** to provide our organisation membership service by keeping business contacts informed about membership services and sector updates, including the COSTA Newsletter and Update Bulletins.
* Where you have subscribed to receive an email bulletin such as the COSTA Newsletter and Update Bulletins and you will have given **consent** for us store your contact information and to contact you by subscribing. You can unsubscribe at any time from the email itself or by contacting us.
* Where you have applied for a Grant Scheme that we have set-up or are delivering or managing e.g. DAERA Rural Micro Capital Grant Scheme.
* Where we have **legal obligations** under UK or EU law, such as fraud prevention, the exercise of consumer rights, and under equal opportunity responsibilities and Section 75 etc.

**Who the Information May Be Shared With**

We do not share your information with any third parties for the purposes of direct marketing.

In some circumstances we may have a legal obligation to share information for law enforcement purposes, such as to cooperate with investigations or in line with a court order.

We sometimes need to share the personal information and where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). Where necessary or required we share information with:

* Our Funders.
* Central or local government.
* Providers of relevant grants / services.
* Current, past and potential employers.
* To run events in partnership with other organisations we may share limited personal information from your event registration including name, organisation, job role and email address with the event partners.  We do this where we determine it is within our **legitimate interest** to facilitate the event.
* In any other case where we have obtained your consentin order to share your information with named third parties.
* As may be required by law.

**Transfers**

We do not transfer personal information overseas. Any transfers made would be in full compliance with all aspects of the Data Protection Act / GDPR and would remain within the European Economic Area (EEA).

**How We Store Your Data**

The data that we collect from you is securely stored on our premises at the COSTA office and backed up on external password discs in a secure location compliant with UK law regarding the protection and storage of data.  All information you provide to us is stored securely and is password protected.

**Data Security & Retention**

We minimise the amount of personal data we keep about you and the period of time we hold it for.

In some cases, we retain records for the length of time that we are legally obliged to do so (for example, invoices, payment information, job application and monitoring information, minutes of general meetings and trustee decisions). In other cases, we apply our retention schedule when we no longer require personal data and ensure its secure deletion or disposal. The method of disposal will be appropriate to the sensitivity of the data. Records and information will be disposed of in accordance with all relevant legislation and as per disposal schedule detailed on COSTA’s Record Handling Grid.

We make sure that we don’t collect more personal information than we need in order to carry out our activities and review our practices regularly.

When we use third party services and cloud services to process personal data we take due diligence to make sure that they are reputable and have appropriate data protection practices.

**Training & Review**

All staff are trained and fully informed of their responsibilities at recruitment and Induction stages. All staff receive regular training to ensure constant updates and on-going compliance with all legislative requirements.

COSTA regularly reviews and updates all our Policies, Procedures and practices including: Data Protection / General Data Protection Regulation, ICO Registration, Privacy, Document Retention & Disposal and record maintenance.

**Changes to our Privacy Notice**

We keep our privacy policy under review and any updates will be made available on this webpage.

**This privacy policy was last updated in January 2021.**

**Your Rights**

Your rights, with regard to how we handle and process your information, are clearly defined in the Data Protection Act (DPA) / General Data Protection Regulation (GDPR). You may find more information about the DPA / GDPR, our obligations and the rights provided to you by it on the [ICO website](http://ico.org.uk/).

This privacy notice only applies to COSTA’s collection of information. If you follow a link to any third party from our websites or emails please ensure you familiarise yourself with their privacy policy before sharing your personal information.

**Contact Us**

For more information on our privacy policy or with regard to the information we hold about you please contact us by any of the following:

* Email to [**info.costa@btconnect.com**](mailto:info.costa@btconnect.com)with the subject heading “Privacy Policy”.
* Writing to The Data Protection Officer, COSTA, President Grant’s Homestead, 45 Dergenagh Road, Dungannon, Co. Tyrone, BT70 1TW.

The Data Protection Act / GDPR gives you the right to access information held about you via a Subject Access Request. Any access request may be subject to a fee of up to £10 to meet labour costs in providing you with details of the information we hold about you.

**Subject Access Request (SAR)**

You may instruct us to provide you with any personal information we hold about you. provision of such information will be subject to supplying proof of your identity when submitting a request. Information will be supplied by 14 days.

Identification examples include:

* a photocopy of the identification pages of your current passport or driving licence;
* a copy of a current utilities bill, or credit card / bank statement which shows your address.

This identification information will be returned to you if requested; otherwise it will be securely destroyed once we no longer need it.

It is helpful if you can give us any information to help narrow the search, such as specific personal information you are looking for or which aspect(s) of COSTA’s services or programmes you have had contact with.

**Please use the *Subject Access Request Form* below to request your information.**

***COSTA Subject Access Request Form***

**Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Email address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Telephone: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Postcode: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**What information are you requesting?**

Please be as clear and concise as possible, including, for example, your full name, any other names you are known by, groups you may represent and what COSTA services you may have accessed.

**Please provide any additional information which relates to your request.**

***Please attach documentary proof of your identity***

﻿Examples include a photocopy of the identification page of your passport or driving licence, or a copy of a current utilities bill or bank statement showing your address.

Evidence attached: **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Would you like us to return this documentation?** *(please tick one)*

Yes  No  ***please destroy this documentation when no longer needed.***

**How would you like us to correspond with you?** *(please tick one)*

By email, using the email address provided  OR By post, using the address provided 

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**