

Privacy Policy

The privacy and security of your personal information is important to us at This New Ground and we are committed to ensuring that your personal data is protected. Any personal information collected by us will only be processed in accordance with this privacy policy.

A. What does this policy cover?

This privacy policy sets out how This New Ground processes personal data (that is, information by which an individual can be identified or which can be related to an identifiable individual) collected by us in the course of our lawful activities, and explains our obligations and your rights under the Data Protection Act 2018, the General Data Protection Regulation and any related or subsequent UK legislation or regulations ('Data Protections laws'). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this.

If you wish to discuss any matter relating to how your data is used, please email us at nathalie@thisnewground.com or phone us on 07566710435, marking your communication for the attention of the Data Protection Officer. We may be required in certain instances to ask that your request for information be submitted in writing.

References to the processing of information includes the collection, use, storage and protection of data.

This New Ground is a Community Interest Company registered at Companies House in England & Wales with company number 11079671¹ and is the 'data controller' within the meaning of the Data Protections laws for the purposes of this policy, except as stated otherwise. This policy extends to This New Ground's staff, volunteers and to the extent set out below, anyone else processing data on our behalf from time to time.

B. Why do we process your data?

Organisations are permitted to process personal data if they have a legal basis for doing so. This New Ground processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed or, in the case of a child who is too young to provide such consent, by their parent/guardian;
- This New Ground has a legitimate interest in processing the data; and/or
- It is necessary in relation to a contract, agreement or ongoing arrangement for the provision of services which someone has entered into with This New Ground or because someone has asked for something to be done so they can enter into a contract, agreement or arrangement with us; and/or
- This New Ground has a legal obligation to process data.

We may also process data that has been shared with us by another Data Controller, such as a school whose pupils are taking part in one of our activities. In such cases, This New Ground may be a Data Processor within the meaning of the Data Protection

¹ With its registered office at Larch House, Parklands Business Park, Denmead PO7 6XP, England.

laws, but will still process data in such a way as to protect its privacy and security and in accordance with the stipulations regarding its use made by the Data Controller. Where this is the case, This New Ground relies on the party sharing data with us to ensure that all requisite permissions, consents or other legal bases for sharing the data have been obtained or complied with.

If and to the extent that This New Ground is relying on solely consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which we are able to provide services to or interact with you in future.

We may change this policy from time to time and any such changes will be published online at <https://jcd.uk.com/privacy-policy/>. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

This policy was last reviewed in June 2020.

B. What data do we collect?

We collect the data necessary for This New Ground to pursue its stated charitable objectives and to elevate the artistic voices and talents of people with learning disabilities in Hammersmith and Fulham and to remove barriers and increase access for people with learning disabilities to lead, make and participate in the arts, and in that connection, running programs and events, keeping our supporters informed of our activities, marketing, fundraising and the effective running of This New Ground through its professional staff and volunteers. Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses
- Information relating to event participants necessary for us to safely and successfully run events including, but not limited to, relevant information concerning health, access or dietary requirements
- Photographic and video images which we may use for marketing and promotional purposes, including on social media, provided we have requisite permissions and/or consents
- Information relating to staff and volunteers necessary for their engagement and participation in This New Ground activities including, but not limited to, payroll details and information required to ensure the safeguarding of vulnerable persons
- Stakeholder, supporter and donor records (including payment information) and preferences
- Such other information that is relevant and necessary for This New Ground to carry out its activities, charitable purposes and legal obligations.

C. What we do with the data we process

This New Ground uses the data collected to maintain accurate internal records of our engagement with staff, volunteers, supporters, beneficiaries and those caring for them, partner organisations, event participants and others. These records facilitate our activities run in accordance with our charitable objects as explained above. Data may be processed and viewed, to the extent necessary, by staff and certain volunteers in the course of This New Ground's activities (all of whom work in

accordance with this privacy policy) and will be retained only for as long as is reasonable and permissible in law.

We may use your personal information to send you information about This New Ground and matters relating to This New Ground's activities which we think may be of interest to you.

We will only share data with trusted third parties for the above stated purposes, including to process payments to or from individuals, to save and securely backup data, to run events or where necessary for us to communicate with you (such as mailing companies for postal communications or through email campaigns or newsletters). Data will only be shared in such circumstances once we are satisfied that it accords with our privacy policy and that shared data will be kept safely and securely and only for as long as necessary for the explicit purpose for which it was shared. We will not otherwise sell or share your personal information with any other businesses or marketing companies without your explicit consent.

You, as the data subject, may unsubscribe from any mailing list you are subscribed to, including via our website, and you may request deletion or correction of your data at any time in writing, subject to any overriding legal requirement for its retention. We may keep certain limited data on a 'suppression list' so we know, if requested, not to contact you or process your data in future until further notice.

D. Your rights in relation to your personal data

You may request details of personal information which we hold about you. Any such request must be submitted in writing. A small fee may be payable if an information request is particularly onerous.

You may choose to restrict the collection or use of your personal information, but this may restrict the way in which This New Ground is able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation requiring This New Ground to retain data, such as the retention of donor or Gift Aid records for Her Majesty's Revenue and Customs or for reasons relating to the safety and welfare of young people.

You are responsible for the accuracy of data you have provided to This New Ground. If you believe that any information we are holding about you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

You can obtain further information about Data Protection and privacy laws by visiting the Information Commissioner's website at: <https://ico.org.uk/your-data-matters/>.

E. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data on behalf of This New Ground do so in accordance with this policy and on the basis that This New Ground is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. You are responsible for keeping the password you use to login to our website or App confidential; we cannot see your password and will not ask you for your password.

F. Web browsing and Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type, together with certain anonymous statistical data about your browsing activities and patterns which does not contain any personal data.

G. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.