



## **EXETER PRIDE**

### **POLICY COVERSHEET**

<b>Name of Policy:</b>	Privacy Notice
<b>Owner and key contacts:</b>	Data Protection Officer
<b>Date issued:</b>	February 2024
<b>Purpose of Policy:</b>	<p>The UK General Data Protection Regulation (GDPR) requires that data controllers provide certain information to people whose information (personal data) they hold and use. A privacy notice is one way of providing this information. This is sometimes referred to as a fair processing notice.</p> <p>This privacy notice identifies who the data controller is, with contact details for the Data Protection Officer. It explains the purposes for which personal data are collected and used, how the data are used and disclosed, how long it is kept, and the controller's legal basis for processing.</p>
<b>Intended Audience(s):</b>	Trustees, Committee, Members and Volunteers, wider public
<b>Approval for this Policy given by:</b>	Trustee Board

<b>Version Control</b>			
<b>Current Version Number</b>	2.0		
<b>Date of Last review</b>	February 2025		
<b>Date of Next review</b>	February 2028		
<b>Expiry date</b>	<i>The Policy is reviewed triennially</i>		
<b>Amendment History</b>			
<i>Ensure links are updated online following amendments.</i>			
<b>Version No.</b>	<b>Date</b>	<b>Summary of amendments (if no change, write NA)</b>	<b>Author</b>
1.0	Feb 24	Policy Creation	Annie Bennett
2.0	Feb 25	Policy first review. Policy to be reviewed triennially going forward	Annie Bennett

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## ***PURPOSE***

The UK General Data Protection Regulation (GDPR) requires that data controllers provide certain information to people whose information (personal data) they hold and use. A privacy notice is one way of providing this information. This is sometimes referred to as a fair processing notice.

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## ***KEY TERMS***

- Comply with a legal or regulatory obligation **means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.**
- Consent **means freely given, specific, informed and unambiguous indication of a data subject's wishes which is indicated by a positive action.**
- **External Third Parties** means:
  - a) Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
  - b) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance, and accounting services.
  - c) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- **Legitimate Interest** means the interest of our organisation in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **We, us, our** means Exeter Pride, a charity (registered number 1161062) and having its registered office at: Exeter Phoenix, Bradninch Place, Gandy Street, Exeter, EX4 3LS.

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## ***PRIVACY AND COOKIES NOTICE***

**1. Exeter Pride respects your privacy and is committed to protecting your personal data.** This privacy policy will inform you as to how we look after your personal data when you visit

our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## **2. Important information and who we are**

This privacy policy aims to give you information on how Exeter Pride collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign for our events, sign up to volunteer, take part in a parade, or donate to us.

It is important that you read this privacy policy carefully together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to data protection laws applicable in the United Kingdom and we are responsible as 'controller' of that personal data for the purposes of those laws.

### **2.1. Your Duty To Inform Us of Any Changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **2.2. Third Party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **3. The Data We Collect About You.**

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where it is no longer possible to identify the person (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, email address or similar identifier, provided via our contact forms.
- **Contact Data** includes email addresses and telephone numbers as supplied on our contact forms by you.
- **Financial Data**– We do not collect financial data about you.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** – our marketing is employed via our social media accounts and by you viewing the website.
- **Sensitive Personal Data** includes information about your racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, , data concerning health, sex life or sexual orientation – We do not hold this data.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website page. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

#### 4. How Is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms on our website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - purchase products from our website or tickets for our events;
  - apply to volunteer;
  - donate to us;
  - complete any other forms on our website (such as “contact us” forms);
  - Participate in our surveys or research
- **Automated technologies or interactions** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details, including details on how you can block cookies by activating settings on your browser.
- **Third parties.** We may receive personal data about you from various third parties as set out below:
  - Identity Data from the following parties:
  - Technical Data from the following parties:
  - analytics providers such as Google Analytics (based outside the EU).

#### 5. How We Use Your Personal Data.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have given us specific and informed consent.

See section 1.3 of this policy above find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us, for our contact details, see section 16 of this policy below. We do not send direct marketing emails or newsletters.

## 6. Purposes For Which We May Use Your Personal Data.

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>PURPOSE/ACTIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To enable you to: (a) volunteer with us; (b) be part of our parade or event (e.g. march in a parade or host a stall at our events);	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us, and to promote and support the LGBTQ+ community)
To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our organisation and this website	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our

(including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(c) Technical	organisation, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, events, products and services and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests to keep our website updated and relevant, to develop our organisation and to inform our marketing strategy)

## 7. Data use choices.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We do not hold specific information about you for the purpose of marketing. Our marketing is done on social media platforms where you have the ability to control your own privacy settings and choices.

We will only contact you if you have requested contact via our website forms, such as contact forms, be in the parade forms, sponsorship forms, perform at pride forms and if you have contacted us directly by email or social media.

## 8. Third-Party Marketing.

We do not collect data for third parties and do not share any details about you with any third parties.

## 9. Cookies

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Our website does not collect any cookies however we urge you to note that some of the links contained on our site may take you to various websites where they may collect cookies – these cookie notices and terms should be reviewed and agreed by yourselves, as you deem appropriate.

## 10. Disclosures Of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 5 above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **11. Internal Transfers Of Your Personal Data.**

We do not transfer your personal data outside the European Economic Area (**EEA**).

### **12. Data Security.**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

### **13. Data Retention.**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **14. Your Rights.**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In particular, you have the following rights which you can exercise free of charge, by contacting us via the details below:

- **Access** – The right to be provided with a copy of your personal data (the right of access)
- **Rectification** – The right to require us to correct any mistakes in your personal data
- **To be forgotten** – The right to require us to delete your personal data—in certain situations
- **Restriction of processing** – The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
- **Data portability** – The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
- **To object** – The right to object:
  - at any time to your personal data being processed for direct marketing (including profiling);
  - in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.

**Not to be subject to automated individual decision-making** – The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **15. How To Contact Us.**

Please contact us by post or email if you have any questions about this privacy policy or the information we hold about you using the details are shown below.

**Address:** Exeter Pride, Exeter Phoenix, Bradninch Place, Gandy Street, Exeter, EX4 3LS.  
[info@exeterpride.co.uk](mailto:info@exeterpride.co.uk)