

DC013 Privacy Policy

This privacy notice tells you what to expect us to do with your personal information. This policy has been formulated using the ICO guide available here:

<https://ico.org.uk/for-organisations/advice-for-small-organisations/>

Contact details

Post

DC Engage CIC, SEESAW, 86 Princess Street, Manchester, M1 6NG

Email

hello@dividedcultureco.com

What information we collect, use, and why

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Donation history
- Tax payer information (for Gift Aid purposes)

We also collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Health information
- Sexual orientation information

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses

- Marketing preferences
- Recorded images, such as photos or videos
- Donation history
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

We also collect or use the following information **for service updates or marketing purposes**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Sexual orientation information

We collect or use the following personal information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Recorded images, such as photos or videos
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

We also collect or use the following information for **research or archiving purposes**:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Health and safety information
- Criminal offence data

We also collect or use the following information to **comply with legal requirements**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic information
- Health information
- Sexual orientation information

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We also collect or use the following information for **recruitment purposes**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Account information
- Purchase or service history
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas

- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Ensuring that the people we work with are representative of our geographical working area and are going to support and meet the needs of our organisation and it's beneficiaries.
 - Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- **Vital interests** – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Where we get personal information from

- Directly from you
- Regulatory authorities
- Family members or carers
- Social services
- Charities or voluntary sector organisations
- Schools, colleges, universities or other education organisations
- Councils and other public sector organisations

How long we keep information

We regularly review the length of time we keep personal data and will only keep your information for as long as required to complete the original purpose of collection. If required to report on employees, attendees of workshops or productions for funding purposes, we will retain the information up to the point where we have reported the relevant information to our funders.

Unsuccessful job applicants will have their data deleted six months after the appointment has been made. If a candidate was second choice for a role, we may retain their information until the probation period has been completed by the candidate appointed.

DC Engage CIC maintain a retention schedule to track personal information held by the company and to ensure that information that is no longer required for its original purpose is securely deleted in a timely manner. This allows us to track documents which may need to be retained for longer; for example, HR documents for employees must be retained for six years after employment ends for legal reasons.

Others we share personal information with

- Other health providers (eg GPs and consultants)
- Charities and voluntary organisations
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors

- Legal bodies or authorities
- Local authorities or councils
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>