#### Friends of the Garibaldi Community Interest Company: Privacy Policy and Notice

#### AIM

The aim of this policy is to provide you with information about the following:

- What information we collect from you and why
- How we use this information
- How you can access and manage your information.

We are committed to protecting and preserving your information, being transparent about what data we hold and how we use it.

This Privacy Policy replaces all previous versions and was updated on 26 June 2020.

### **SCOPE**

This policy applies to anyone who buys or uses any of the services provided by Friends of the Garibaldi, its staff and its volunteers.

# **OVERVIEW**

By using any of our services, agreeing to take a paid or voluntary staffing role, or by visiting our website, Twitter or Facebook page, you agree to our use of your information as set out in this privacy policy. This privacy policy forms part of any additional terms you are provided with in relation to our services.

#### INFORMATION WE COLLECT

1. Information you give us, or we automatically collect

When you agree to receive or pay for any of our services, we will need certain information to process your requirements. This may include details such as your name, email address or postal address, telephone or mobile number, financial or credit card details. We may ask for other information that relates to the service you are using or ordering.

If you complete a survey for us, we may ask for information about you and your views/preferences. We will make clear to you at the time why we are collecting this information and what it will be used for.

We will always make sure we ask you to opt in to any updates we send out. Unless you do so, we will not provide or send any information or mailings to you.

We will also need to collect information from you if you become a member, or would like to volunteer for Friends of the Garibaldi CIC

#### HOW WE USE INFORMATION

The information we collect is used in a variety of ways. It allows us to provide you with a service, to improve our understanding of what you need from us, and to enhance the provision

of our services to you. In some circumstances, we will also need to collect information to ensure we provide a duty of care to staff, volunteers and customers, as well as to comply with our legal responsibilities.

We could use the information we collect to:

- Process your purchase of goods or services
- verify your identity and correct details when you use our services or contact us
- where you have agreed, provide you with information about other activities, events or services, offers or products which you may be interested in
- tell you about changes to our services, prices or terms and conditions
- carry out any marketing analysis, profiling or create statistical or testing information to help us improve the services we offer you
- recover any monies you may owe to us for using our services
- analyse our services with the aim of improving them
- carry out due diligence on potential suppliers in line with our ethics policy.

You are in control of your data and if you do not want us to contact you, please let us know by phone, post or email using the details at the end of this document.

#### SHARING INFORMATION

We will only share your information with organisations outside of the Company:

- with your consent if we are using information for a purpose other than as set out in this Privacy Policy
- as part of any legal proceedings
- in response to properly made requests from law enforcement agencies for the prevention and detection of a crime, for the purpose of safeguarding or when the law requires us to
- as outlined in the COVID-19 codicil below

Where we share your information with third parties who help us provide services, they have their own information sharing policies and they must comply with the requirements of the GDPR 2018 and any other relevant legislation to protect your information and keep it secure.

# THE PERIOD FOR WHICH WE HOLD YOUR INFORMATION

The time period for which we keep information varies according to what the information is used for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected (and which you agreed to). After that point it will then be deleted completely. We have an Information Handling Policy which covers discard dates and these will be adhered to in all circumstances.

We will continue to hold information about you if you do not become our customer when your application for an event, or activity is declined by us or cancelled by you. We will only hold such information for such periods as is necessary for the purpose of dealing with enquiries and complying with any legal obligation.

# ACCESSING YOUR INFORMATION

Data protection legislation entitles you find out what information we hold about you. If you want to find out what information we hold, please submit a request in writing to:

The Garibaldi Public House, 29 Mill Street, Redhill, Rh1 6PA

Alternatively, please email us at: privacy@garibaldiredhill.co.uk

Please mark correspondence for the attention of our Data Protection Officer.

In addition, if any of your information is incorrect or your personal details have changed you can notify us in writing and we will update your details.

We will respond to you within a maximum of 28 days.

# MARKETING PREFERENCES

Where you have agreed to us contacting you when you joined our mailing lists, or our network, we will contact you with details of products, services and events that we believe you may be interested in. If you change your mind and do not want to us to send you marketing communications, you can do this by:

writing to us, emailing us or calling us on the details provided above.

If you do so, we will stop sending you marketing communications that you do not want. If you wish to remain on our lists, at a minimum we may need to send you service-related messages including changes to services or terms and conditions.

# PROTECTING YOUR INFORMATION & YOUR RIGHTS

We take protecting your data seriously and will do our utmost to employ appropriate organisational and technical security measures to protect your information against unauthorised disclosure or processing.

If you wish to raise a complaint on how we have handled your personal data, please:

- Call us on 01737 773094. The line is open Wednesday to Sunday from 12 7pm. Outside of these hours, you can leave us a message and a contact name and number and we will return your call the next working day.
- Email us at: privacy@garibaldiredhill.co.uk
- Write to us at: Data Protection Officer, The Garibaldi Public House, 29 Mill Street, Redhill, Rh1 6PA

We will respond to your complaint within seven days. If we have been able to resolve it by this point, we will confirm that it has been received and that it is being investigated. We will resolve all complaints within four weeks. If you do not believe we have resolved your complaint satisfactorily, you can contact the Information Commissioner's Office (ICO) on the details below:

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

Email: casework@ico.org.uk, Telephone: 0303 123 1113, Textphone: 01625 545860

# COVID-19 Codicil

In response to COVID-19, we will need to collect specific information to allow us to comply with legal requirements, and to ensure our duty of care for all our staff and customers.

On booking a table, we will ask you to provide us with your name, telephone number and email address, as well as those for the individuals who will be accompanying you. Please ensure these details are accurate, and that you obtain your companions consent before passing this information to us. Please also explain to them the purpose and time period for which their information will be retained.

It will be stored for a minimum of 21 days, and we will not be able to delete it, even at your request, within this time period. This is to ensure that if a staff member or customer subsequently tests positive for COVID-19, we are able to comply with our NHS test and trace responsibilities. For this purpose, and if requested to do so by the proper authorities, we will share this information with third parties, who may in turn contact you directly. We also reserve the right to contact you directly in these circumstances.

Unfortunately, given current circumstances, you will not be allowed access to our premises without providing this information.

If you become unwell with COVID-19 within fourteen days of visiting our premises, please contact us at info@garibaldiredhill.co.uk to let us know.

To facilitate easier repeat bookings, you can opt-in to storage of this information for a period of three months. Please ensure you have also received permission from the individuals who will be accompanying you, if their details should also be retained for repeat bookings.

### CHANGES TO OUR PRIVACY POLICY

This policy will be reviewed and may change from time to time.