

Browns Community Services CIC

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Privacy Policy

Browns Community Services CIC takes your privacy seriously. This privacy policy sets out how we use and protect any information about you. We respect your privacy and take great care with the information we obtain. We only ask for personal data when it is necessary to provide you with the service you have requested.

1. Data Protection Principles

Browns Community Services CIC (hereafter referred to as Browns) is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR). Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date;
- e. retained for no longer than necessary for the purposes for which the personal data are processed;
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- g. identified accountable responsibility.

2. General Privacy Provisions

This policy applies to all personal data processed by Browns. The Responsible Person shall take responsibility for Brown's ongoing compliance with this policy and GDPR.

Browns is the data controller (ICO registered: ZA211539) for personal data about clients, prospective clients, job applicants, current and former employees, current and former volunteers, donors, event/training attendees and service users. Browns Community Services CIC registered address is 3000 Hillwood Drive, Lyne, Surrey, KT16 0RS. The Responsible Person for data protection and compliance at Browns is Angeline Gore, CEO. To contact Browns with a data protection query regarding the processing of your personal data, please email info@brownscs.co.uk.

Browns does not trade personal data for commercial purposes and will only disclose it if required by law, necessary to arrange your training/service user attendance, or with your consent.

All Browns employees and volunteers are trained in this policy and in the related IT policy and are accountable to the Responsible Person for any breaches to personal privacy within the understanding of Browns policies.

3. Lawful, Fair and Transparent Processing and Purpose Limitation

3.1 General

To ensure its processing of data is lawful, fair and transparent, Browns maintains a Register of Systems that identifies all systems or contexts in which personal data is held and its lawful basis for processing. The Register of Systems shall be reviewed at least annually. All individuals have the right to access their personal data and any such requests made to Browns shall be dealt with in a timely manner.

All data processed by Browns must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests. Browns believes that all these purposes are justified on the basis of our legitimate interests in running and promoting the business, our contractual requirements to deliver the agreed services, and our legal obligations, any exception we carry out on the basis of your provided and informed consent. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Sections 3.2 to 3.3 provide details of the personal data requested, how it is processed and links to the privacy policies of any third party processors.

3.2 Email and Internet

Browns uses [Zoho](#) for email and web pages www.brownsco.co.uk. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Browns uses [Egress](#) to encrypt and protect email traffic containing personal data beyond that general personal data listed below (3.3) in line with government standards. If your email service does not support Egress, you should be aware that any emails we send or receive may not be protected in transit.

Browns uses [Zoho](#) for web pages www.brownsco.co.uk. Browns does not track website traffic but users should be aware that Cookies (small text files that are placed on your computer by websites that you visit) are widely used in order to make websites work, or work more efficiently. Browns does not use persistent cookies. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org.

Browns uses [Mailchimp](#) to manage registrations to our newsletter, only supplied on request by providing your email.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent is clearly available by contacting info@brownsco.co.uk.

Browns has a presence on [Twitter](#) and [Facebook](#) but does not utilize any personal data from these sources.

Browns uses restricted folders on [Google Drive](#) to store documents. Access granted only by Browns IT Administrator to specified folders as advised by Browns Responsible Person for Data Protection.

3.3 General Personal Data

Course Attendees:

When you book onto a Browns course, we ask for you to provide us with your name, email address, contact telephone number. We process your details purely for the purpose of administering the course. We retain your information for 12-months on completion of the course, at which point we delete your details. Once on the course, further details (eg qualifications, employment history for CV) may be requested on the basis of legitimate interests or consent and these are detailed in the Register of Systems, available on request info@brownscs.co.uk.

Service Users / Referrals:

When you are referred to Browns or you contact us to become a Service User, we ask for you to provide us with your name, email address, contact telephone number, organization (if appropriate). We process your details purely for the purpose of providing a service (eg one to one social support). Once accepted into the service provided by Browns you will be asked to sign our consent form to opt in to allow Browns to collect / process further personal data about you; this includes personal sensitive data.

Volunteers / Employees:

When you apply to work with Browns, we ask you to provide us with your name, email address, postal address, contact telephone number, qualifications, employment history. We process your details purely for the purpose of identifying your suitability for engagement and may require additional information (eg references, Disclosure and Barring Service (DBS) checks) on the bases of legitimate interests, legal obligations or contract and these are detailed in the Register of Systems, available on request info@brownscs.co.uk. Where payments (expenses or payroll) are involved we may use the accounting services of [Atek](#) (ceased May 2018), [Green Accountancy Ltd](#) and [Xero](#).

Donors:

When you donate to Browns, we ask you to provide your name and company details and we may process your donation using [PayPal](#) and the accounting services of [Atek](#) (ceased May 2018), [Green Accountancy Ltd](#) and [Xero](#).

4. Data Minimization and Accuracy

Browns shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Browns shall take all reasonable steps to ensure personal data is accurate. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

5. Archiving / Removal

To ensure that personal data is kept for no longer than necessary, Browns has an archiving policy for each area in which personal data is processed and review this process every 3 years. The retention periods are stated in the Register of Systems; this archiving policy considers what data should / must be retained, for how long, and why.

6. Security

Browns is committed to ensuring your information is secure. In order to prevent unauthorised access or disclosure, Browns has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information held.

Browns shall ensure that all personal data is stored securely and confidentially. Browns Register of Systems includes a list of third party Data Processors and online tools with links to their Data Protection provisions. The Responsible Person must ensure that this Register is reviewed annually.

Browns employees and volunteers are trained in the Browns IT Policy making provisions that:

- Access to personal data shall be limited to personnel who need access and appropriate security in place to avoid unauthorised sharing of information.
- Personal data is stored securely using modern software that is kept-up-to-date
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place

7. Breaches and Your Rights

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Browns shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to ICO.

As an individual whose personal data is processed by Browns you have these rights:

- The right to be informed, which is what this privacy policy is for.
- The right to access what data we hold about you.
- The right to object to processing carried out on the basis of legitimate interests.
- The right to erasure (in some circumstances).
- The right to data portability.
- The right to have your data rectified if it is inaccurate.
- The right to have your data restricted or blocked from processing.

If, at any time, you want to verify, update or amend your personal data please email Browns directly at info@brownscs.co.uk

You also have the right to lodge a complaint about our processing with the UK's Information Commissioner's Office (<https://ico.org.uk/>).

Version History:

We keep our privacy policy under regular review (at least every 3 years). This privacy policy was last updated on 15/05/2018 (version 1).

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