

1. Purpose of this Policy

Imagine Norfolk Together has created this Privacy Policy to ensure compliance with legal and regulatory requirements regarding the Personal Data collected about you. This Privacy Policy explains what personal data might be collected, how and why it would be collected, who it might be shared with and how it is protected.

Appendix A outlines how you can complain to us or the Supervisory Authority, if you have concerns that this Policy is not being applied in relation to your personal data.

2. What personal information could be collected, and how?

The information collected about you is information that you have provided via the company website, by email, in writing, by telephone or in person; or any updates to that information you have provided since. This includes the following personal data:

- Name
- Contact details including business or personal addresses, telephone numbers and email addresses
- Photographs & video images
- Any other personal data you have provided to us for specific services (we would seek your direct and informed consent for the project)

This information is retained for the duration of your use of our service(s) plus 6 years thereafter, other than where there is a legal requirement to retain it for longer in accordance with our data retention schedule.

3. What legal basis is applied to the processing of your personal data?

- For the performance of a contract
- Legitimate interest
- Explicit consent

4. How is your information stored and accessed?

Your information is stored and processed using the Imagine Norfolk Together internal systems and applications which is accessed controlled and only accessed by registered and approved users. Users comprise of:

- Employees of Imagine Norfolk Together and those working on its behalf as service providers
- Production partners

In the unlikely event that we transfer your data outside of the EEA, we ensure that standard contractual clauses (SCC's) are in place to address the security and privacy of your personal data.

5. How will Imagine Norfolk Together use your information?

Imagine Norfolk Together will use your personal information to maintain accurate records for contacting you for the following purposes;

- To ensure we are able to contact you in relation to your role with Imagine Norfolk Together
- To keep you updated with news about products and services, via email bulletins and updates

We do not use your data for automated decision-making or profiling.

6. Sharing your information

Imagine Norfolk Together will not sell or disclose your information to third parties other than those needed to meet contractual or legal obligations or to protect the vital interests of the data subjects we collect data about. For marketing purposes, we have conducted a Legitimate Interest Assessment.

The information Imagine Norfolk Together holds about you will only be used for the purposes stated and will be retained in line with the requirements of our retention schedule. Imagine Norfolk Together may disclose your information to the following third parties;

- Our services providers to ensure the provision of services and supplies needed to conduct business
- To law enforcement agencies to detect and prevent criminal activity - this excludes private investigators. Imagine Norfolk Together will not disclose Personal Data in this instance.

7. How will Imagine Norfolk Together protect your information?

Imagine Norfolk Together uses a range of security techniques to protect Personal Data, these are, but are not limited to;

- security policy;
- use of encryption techniques;
- control of mobile devices;
- employee security training program(s);
- robust and up to date anti-malware program;
- secure data disposal;
- access control;
- network monitoring and management.

8. Your Rights

You have several rights regarding your Personal Data, and Imagine Norfolk Together observes and complies with these rights by ensuring that you can have access, upon request, to any of the data we hold about you. You have other rights regarding your Personal Data that you may exercise if Imagine Norfolk Together has no legal basis to reject your request, these rights are:

- You may object or restrict our handling of your data.
- You may have your data delivered to you in a portable, readable, and useable format.
- You may have your data corrected or updated at any time if you believe the data we hold is incorrect.
- You may have your data erased from our systems when we have no legal reason for retaining it.

Appendix A

The contact information provided below is to enable anyone to exercise their rights regarding their own personal data that we hold or process. If you wish to exercise your rights as detailed above, please contact us on the below email address and we will respond to you within 30 days.

Relevant contact information:

Development Manager – anna.heydon@togethernorfolk.org.uk

If you wish to make a complaint about the way Imagine Norfolk Together handles your data, please contact the Information Commissioners Office (ICO) on the below contact details:

Wycliffe House, Wilmslow, Cheshire, SK9 5AF, Tel: 0303 123 1113 (local rate)

Or you can use the online service which allows you to make a complaint using the online form. You can report a breach, a concern or even just request more information. The ICO online can be found here: <https://ico.org.uk/global/contact-us/>