



Recyke y'Bike Ltd
Customer Data Protection Policy and Privacy Notice

1. INTRODUCTION

This policy sets out information about the processing of customer data, and how customers' privacy in relation to their data is protected. This policy does not confer any contractual rights.

A simplified Privacy Notice is set out at Appendix 1.

Recyke y'bike Ltd. is a registered charity, constituted as a company limited by guarantee. We are registered in the UK as Charity No. 1124639, and Company No. 5839547. Our website address is: <http://recyke-y-bike.org>, and also accessible via <http://www.recyke.bike>

2. OUR OBLIGATIONS IN RELATION TO PROCESSING PERSONAL DATA

Recyke y'bike must comply with the following obligations when processing your personal data:

- That your data is used lawfully, fairly, and in a transparent way
- That your data is collected only for valid purposes, which have been clearly explained to you
- That the data collected is relevant to the purposes Recyke y'bike has told you about, and limited only to those purposes
- That your data is accurate and up-to-date
- That your data is kept in a format which allows for you to be identified for only as long as necessary
- That your data is kept securely

3. WHAT DATA WE HOLD

The data we hold about you is set out in the table at Appendix 2.

4. WHY WE HOLD YOUR YOUR PERSONAL DATA

Recyke y'bike is a 'data controller' and needs to collect and hold data about customers in order to undertake the work you have asked us to do (e.g. we need to know your contact details so that we can tell you when your bike is ready to collect).

Recyke y'bike is allowed to hold and process data about you because:

- You have consented to our doing so and/or
- We have a legitimate interest in doing so.

That consent and/or legitimate interest is (or are) the main legal basis (or bases) for processing your information.

Recyke y'bike is registered with the Information Commissioner's Office (ref. ZA478423).

5. HOW WE COLLECT YOUR DATA

Recyke y'bike collects your personal data by the following means:

5.1 Paper service sheets: On the Bicycle Repair and Service sheet when you book your bike in for repairs or a service

5.2: Eventbrite: When you sign up for an event.

5.3: Mailchimp: When you subscribe to the email newsletter.

5.4 Google Forms: We use Google Forms to collect data in two places. The first is our general contact form, which you must provide a valid email address. We use this to respond to your query, and our policy is that we delete the data submitted in the form as soon as we've responded to you. We also collect data for volunteer applications. This is retained long term (and is the primary record for our volunteers) in paper format, which is securely held at our office. The original Google Form submission is deleted once it has been printed off.

5.6 Embedded content from other websites: Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

5.7 Analytics: We use WordPress.com and Jetpack to measure visitor and site usage.

Data Used: WordPress.com records the following details: IP address, WordPress.com user ID (if logged in), WordPress.com username (if logged in), user

agent, visiting URL, referring URL, timestamp of event, browser language, country code. We are unable to see this detail but can only see the data in aggregate form. **Activity Tracked:** Jetpack records post and page views, video plays (if videos are hosted by WordPress.com), outbound link clicks, referring URLs and search engine terms, and country.

5.8 Photos and videos

We may take still and/or moving images of you. Before we do so we will ask for your consent. A consent form is set out at Appendix 3.

6. HOW WE USE YOUR DATA

Recyke y'bike will generally use your personal data for one of the following lawful reasons:

- To respond to your query
- To process an application to volunteer with or work for us
- To perform the contract we have entered into with you
- To keep you updated with information about our work
- To monitor and evaluate the effectiveness and spread of our services

With your consent, we will use your information for the following purposes:

- To publicise the work of Recyke y'bike
- To apply for grant funding
- To understand the diversity of our customers

There are other rare occasions when your personal data or special category data will be used:

- Where we need to protect your interests, or someone else's interests
- Where it is needed in the public interest, or has already been made public
- Where Recyke y'bike has to process this data for legal claims, or to comply with legal obligations

If Recyke y'bike considers that it is necessary to use your personal data for a different and unrelated purpose, you will be notified of this in writing with an explanation of the legal basis for doing so. There may be exceptional circumstances where Recyke y'bike has to process your data without your knowledge or consent where this is required by law.

7. HOW WE KEEP YOUR DATA

7.1 ACCURACY: Recyke y'bike will take reasonable steps to ensure personal data is accurate and up to date.

7.2 RETENTION: to ensure that personal data is kept for no longer than necessary, Recyke y'bike has in place a Records Retention Policy for each area in which personal data is processed and reviews this policy annually. The Records Retention Policy considers what data should/must be retained, for how long, and why.

7.3 SECURITY: Recyke y'bike will ensure that personal data is stored securely using modern software that is kept-up-to-date. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. Paper copies will be kept in a locked cupboard.

7.3 DELETION: when personal data is deleted this will be done safely such that the data is irrecoverable.

8. YOUR RIGHTS AND OBLIGATIONS

Recyke y'bike will only ask you to provide data which is necessary for the performance of your contractual relationship, or any associated legal obligations. If you do not provide this data, Recyke y'bike may not be able to meet its contractual or legal obligations to you.

It is important that you inform us of any changes to your data so that we can make sure the information we hold is accurate.

You have the following rights in relation to your personal data:

- The right to request a copy of your personal data that Recyke y'bike holds about you
- The right to request that Recyke y'bike corrects any personal data if it is inaccurate or out of date
- The right to withdraw your consent to the processing at any time
- The right to request that Recyke y'bike provide you with your personal data and, where possible, transmit that data directly to another data controller
- The right, where there is a dispute about the accuracy or processing of your personal data, to request a restriction on further processing
- The right to lodge a complaint with the Information Commissioner's Office Rights in relation to automated decision-making and profiling.

9. SPECIAL CATEGORY DATA

Any personal data which identifies ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic, biometric or health data, sex life and sexual orientation is passed as special category data. Recyke y'bike doesn't collect special category data from customers.

10. SUBJECT ACCESS REQUESTS

You are entitled to make a subject access request (SAR) for copies of any personal data Recyke y'bike holds about you.

Any request should be made in writing to the General Manager. You may (but do not have to use) the SAR request form at Appendix 4

If you make an SAR, Recyke y'bike may ask you to confirm your identity so we can ensure that personal data is released to the correct person.

Recyke y'bike will reply to an SAR within 30 calendar days, and may extend this for particularly complex requests. Recyke y'bike may withhold personal data if disclosing it would adversely affect the rights and freedoms of others.

Recyke y'bike will only charge you a fee for an SAR if your request is manifestly unfounded or excessive, or if further copies of the same data are requested.

11. DATA BREACHES

Where any personal data is lost, destroyed, corrupted or disclosed, this will amount to a data breach.

If you become aware of a data breach, you must inform the General Manager immediately.

If a data breach occurs, Recyke y'bike will:

- Investigate the cause of the breach
- Take action to contain the breach
- Assess the likelihood and severity of risk to any of a data subject's rights

Where personal data has been sent to someone who is not authorised to have access to it, Recyke y'bike will:

- Inform the recipient not to distribute it in any way or discuss it with anyone else
- Inform the recipient to destroy or delete the data, and require them to confirm in writing that they have done so
- Where relevant, inform the data subject(s) so they can take any necessary action

If there is a risk to any individual's rights, Recyke y'bike will notify the ICO within 72 hours of becoming aware of the breach. If a risk is low, there is no requirement on Recyke y'bike to report the data breach to the ICO.

Date adopted: 12th December 2018

Last updated: 17th September 2019

Date of next review: September 2020

Appendix 1: Protecting your data

Because you are a customer of Recyke y'bike for us, we have to keep some personal data about you.

There are strict rules about how we do this called the General Data Protection Regulations.

We make sure that we protect your data in these ways:

- We keep it up to date
- We store it securely
- We do not keep it any longer than reasonably necessary, and then destroy it securely
- We do not collect it unnecessarily
- We protect it from loss or misuse

We will not share any data without your permission unless you or another person is at risk of harm or we are required to by law.

You have a right to access the records we keep about you.

Please ask us if you would like a full copy of our Data Protection Policy and Privacy Notice.

Appendix 2: Table of personal data (customers)

What information is collected?	What is the information used for?	Legal basis for processing	How is it held?	Who has access to it?	How is it updated?	How long do we keep it?
Names, phone numbers	To contact clients when an order is completed	Legitimate interest	Service sheets,	Trustees, General Manager, Office staff	When bikes are booked in for service, when service is completed,	Service sheets are destroyed 3 months after the bike has been collected.
Names, phone numbers, email addresses	To answer customer queries made through our 'contact us' form	Legitimate interest	Google Drive	Trustees, General Manager, Office staff	When queries are made/answered	Data removed from Google Drive when the query has been dealt with.
Website visitor analytics	To analyse the performance of the website	Legitimate interest	WordPress.com	Trustees, General Manager, Office staff	When customers visit our website	Indefinitely in aggregate form.
Credit card counterfoils	To comply with our accounting requirements	Legal obligation	Locked cabinet	Trustees, General Manager, Finance Manager, Office staff	When credit card payment is made	6 years from date of payment
Ebay records	To comply with our accounting requirements	Legal obligation	Google Drive Ebay	Trustees, General Manager, Finance Manager, Office staff	When purchase is made	6 years from date of payment
Paypal records	To comply with our accounting requirements	Legal obligation	Google Drive Paypal	Trustees, General Manager, Finance Manager, Office staff	When payment is made	6 years from date of payment
Eventbrite	To comply	Legal	Google	Trustees,	When	6 years

records	with our accounting requirements	obligation	Drive Eventbrite	General Manager, Finance Manager, Office staff	booking is made	from date of booking
Newsletter sign-up details: names, email addresses	To publicise our work and keep individuals/ organisations informed	Consent	Mailchimp	Trustees, General Manager, Office staff	When individuals/ organisations sign up for our newsletter, or ask to be removed	When individual unsubscribes or asks to be removed
Invoices: names, addresses, email addresses	To comply with our accounting requirements	Legal obligation	Google Drive	Trustees, General Manager, Finance Manager, Office staff	When invoice is raised and paid	6 years from date of invoice
Photos and audiovisual records	To publicise the work of Recycle y'bike and apply for grant funding. We would only obtain and hold this information with customers' specific consent.	Consent	Google Drive / hard copies kept in a locked cabinet	Trustees, General Manager, staff, members of public	N/A	Permanently
CCTV recording	To prevent and detect crime, and protect staff, volunteers and customers	Legitimate interest	CCTV system	Trustees, General Manager, Office staff		2 weeks

Appendix 3: Consent form

Recyke y'bike

Consent to photography/filming

I consent to Recyke y'bike using photographs and/or video recordings including images of me both internally and externally to promote the charity. These images could be used in print and digital media formats including print publications, websites, e-marketing, posters banners, advertising, film, social media, teaching and research purposes.

I understand that images on websites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as EU/UK legislation provides.

I understand that some images or recordings may be kept permanently once they are published and be kept as an archive of Recyke y'bike.

I have read and understand the conditions and consent to my images being used as described.

Print Name	
Signature	
Date	

Recyke y'bike is committed to processing information in accordance with the General Data Protection Regulation (GDPR). The personal data collected on this form will be held securely and will only be used for administrative purposes.

Your rights

You have the right to request to see a copy of the information we hold about you and to request corrections or deletions of the information that is no longer required. You can ask Recyke y'bike to stop using your images at any time, in which case it will not be used in future publications but may continue to appear in publications already in circulation.

You have the right to lodge a complaint against Recyke y'bike regarding data protection issues with the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

Contact details

If you have any questions relating to this consent form or the way we are planning to use your information please contact:

The General Manager
Recyke y'bike Ltd
2 Hannington Street
Byker
Newcastle upon Tyne
NE6 1JT

If you have any questions relating to data protection please contact Recyke y'bike's Data Protection Officer, Sara Newson, tel: 0191 265 4197, email sara@recyke.bike.

Appendix 4: Subject Access Request Form

Recyke y'bike

Subject Access Request (General Data Protection Regulations 2018)

You are entitled to see most of the information we hold about you. If you want to see it, please fill in this form and hand it to the General Manager.

Your name	
Your address	
Your phone number (if you wish)	
Your email address (if you wish)	
Please tick if you have ever been:	
<input type="checkbox"/> an employee	
<input type="checkbox"/> a volunteer (including trustee)	
<input type="checkbox"/> a customer or user of our services	
<input type="checkbox"/> other	
If you have ticked 'other', please tell us why you think we might have information about you:	
If we may have known you under a different name, please tell us here:	
If you are only interested in particular information, please say what it is:	
I want to see the records you hold on me.	
Signed:	
Dated:	

