

2023-24/11/20 v1

# The Roseland Centre Privacy Policy v1

## CONTRIBUTORS TO DATE:

- Paul Lakeman.

## INTRODUCTION:

This Policy explains when, why and how we collect personal information from you/the user. Any information collected is confidential and kept on a secure server that fully complies with Data Protection Laws. We will protect the privacy of our visitors when visiting our site, speaking directly with us, or communicating electronically with us.

We may change this Policy from time to time. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [enquiries@theroselandcentre.org](mailto:enquiries@theroselandcentre.org).

## WHO WE ARE:

The Roseland Centre is a registered Charity number 1186095. Our website address is:

[www.theroselandcentre.org](http://www.theroselandcentre.org)

Throughout this policy, 'we', 'us' and 'charity' means The Roseland Centre and 'you' and 'your group' means you and your party members or anyone for whom you are making a booking or enquiring to gain further information for.

## COMMENTS:

Currently we have **no "comments" button/facility** on our website. We do have a link to our email address [enquiries@theroselandcentre.org](mailto:enquiries@theroselandcentre.org).

We do operate social media platforms – please refer to the Privacy Policies for each platform below:

- [Instagram Safety and Privacy | About Instagram](#)
- [Meta Privacy Policy – How Meta collects and uses user data | Privacy Centre | Manage your privacy on Facebook, Instagram and Messenger | Facebook Privacy](#)
- [LinkedIn Privacy Policy](#)

We also have a live Crowdfunder project page online – link to Crowdfunder Privacy Policy below:

- [Privacy Policy | Crowdfunder UK](#)

## CONTACT DETAILS:

We obtain information about you when you contact us through email regarding business/enquiries for residential or non-residential bookings, services or activities available from 2024, or if you directly give us any information via email when you make a booking or purchase.

We use any information submitted to provide you with further information about the services we offer or to assist you in answering any questions or queries you may have submitted.

**BOOKING/REGISTER/RISK ACCEPTANCE/INDUCTION/PARTICIPATION FORMS:**

All participating individuals/groups that book and use the resources and services at TRC are asked to submit a TRC Participation Form in the interests of individual safety, duty of care and welfare. This form may contain sensitive information. All information submitted to this form and TRC is done so at the user's own discretion and at their own risk. Our Participation Form is currently managed through SharePoint, and your personal information is kept private and stored securely until a time it is no longer required. We deem this to be 12 months after your participated experience with TRC has closed. Every effort has been made to ensure a safe and secure "form to email" submission process but we advise users using such "form to email" processes that they do so at their own risk. Paper copies submitted are scanned and stored securely with TRC SharePoint and then shredded asap after scanning.

NOTES: The requested booking information above could reveal details of physical or mental health, ethnic origin or religious beliefs. This information is considered "sensitive personal data" under GDPR and other data protection laws. We only collect this information where it is necessary to deliver our services to you to the highest standard practicable. For example, if you inform us about specific dietary requirements, this could indicate specific religious beliefs. If you request special assistance, use of an accessible room or facilities; or provide medical information for you and/or your group, this could reveal information about health. By providing any sensitive personal data you explicitly agree that we may collect and use it in order to provide our services correctly and safely and in accordance with this Privacy Policy. If you do not allow us to process any sensitive personal data, this may mean we are unable to provide all or parts of the services you have requested from us. The above also applies to TRC risk acceptance forms, registers, booking and hire induction forms, etc.

**COOKIES:**

Currently we have **no "comments" button/facility** on our website.

The Cookie Policy is TBC when this changes.

**EMBEDDED CONTENT FROM OTHER WEBSITES:**

Articles on our website may, in the near future, 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 tracking your interaction with the embedded content if you have an account and are logged in to that website.

In addition, if you were referred to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

**WHO WE SHARE YOUR DATA WITH:**

We do not sell or share your data with third parties unless they are contracted services that are purchased and required as part of your arranged plan and experience. We use the data we collect from you to provide information, services, or products you have requested or purchased, and to allow you to interact with us on a correspondence level.

2023-24/11/20 v1

Your name, contact details and query will be recorded securely and confidentially through emails or when you fill out a TRC Participation Form. We will use your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

**HOW LONG WE RETAIN YOUR DATA:**

Whenever we collect or process your personal data, we'll only keep it for as long as necessary for the purpose which it was collected. At the end of that period your data will either be deleted or anonymised, for example by aggregation with other data – so it can be used in a non-identifiable way for statistical analysis or business planning.

Data	Period
Analytics data. Anonymised web traffic data in Google analytics.	50 months.
Query data. Name, email address, etc.	3 years.
Lead booking data. Name, contact details, etc.	3 years.
Adult's data. BOOKING/REGISTER/RISK ACCEPTANCE/INDUCTION/PARTICIPATION FORMS.*	12 months after experience/visit.
Children's data. BOOKING/REGISTER/RISK ACCEPTANCE/INDUCTION/PARTICIPATION FORMS.*	12 months after experience/visit.
Email correspondence. Name, contact details, other info as provided by group leader, etc.	3 years.
Feedback/Testimonial Form post trip.*	3 years.
Payment information. Credit/Debit card information	Not retained after payment is cleared and complete.
Complaints and issues raised.*	3 years.
Incident data. Accident reports, near misses, witness statements, etc.	Adults – 5 years.
	Children – 18 years.
Insurance claims. Notification of claim, details of hearings.	Until claim is resolved or legally expires.
Cookies IP address.	See Cookie Policy, TBC.

\*Paper copies submitted are scanned, stored electronically and securely within TRC SharePoint and then shredded asap.

**UNDER 16's:**

We are concerned about protecting the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand. Whenever you provide us with personal information. We collect children's names, gender and ages as part of our group booking process where an adult is considered to be the group lead.

**PAYMENT DETAILS:**

If you make a purchase from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in secure online capture and processing of credit/debit card transactions. Currently using:

Physical payments: SumUp App and device.

Accounting: QuickBooks online.

Booking System: Emails and bespoke designed forms, (HallMaster/Picasso online, TBC when in use).

2023-24/11/20 v1

**OUTSIDE EU:**

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

**WHO HAS ACCESS TO YOUR INFORMATION:**

The TRC management team have full access to client booking and potential business details which is stored under password protected SharePoint systems. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

**DATA CONTROLLER:**

The TRC management team are the data controllers and determine the purposes and means of the processing of your personal data. Where your data is processed by any third party on behalf of TRC such as a contracted training outfit or one of our chosen contracted activities providers we will ensure the third party is a processor under the GDPR laws. We confirm that we will take steps in order to ensure that this data is processed lawfully under the law in accordance with each agreement that we have in place with each processor.

**SUMMARY:**

We may use your information:

- to make sure we can deliver to you the best possible service and product.
- to assist us in looking after the physical and emotional well-being of our customers.
- to ensure that the content on our website is presented in the most efficient way for you and the computer that you are using and to enable you to participate in interactive features of the site, (TBC with website upgrades).
- to provide you with information relating to our website, product or our services that you request from us.
- to provide you with information on other products that we feel may be of interest to you in line with those you have previously expressed an interest in via our website.
- to process a booking, you have made.
- to meet our obligations arising from any contracts entered into by you and us.
- to seek your views or comments on the services we provide.
- to notify you about any changes to our website, including improvements, and service or product changes.
- to send you communications about products or services that you have requested and that may be of interest to you.
- for our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website.

**YOUR RIGHTS:**

You have the right to ask us for a copy of the information TRC holds about you. This can be done by emailing us at: [enquiries@theroselandcentre.org](mailto:enquiries@theroselandcentre.org).

2023-24/11/20 v1

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date please contact us by the above methods. From the date that we receive ALL the required information, we have one month to process your request.

Security precautions are in place to protect against the loss, misuse or alteration of your information. When you give us personal information, we take steps to ensure that it's treated securely.

Once we receive your information, we will ensure it is filed securely on our SharePoint systems.

#### **REQUESTING ACCESS TO YOUR PERSONAL DATA:**

We respect your right to control your data. Your rights include:

*Right of access* – you have the right to access and obtain a copy of the personal data that we hold about you. We will only charge you for making such an access request where we feel your request is unjustified or excessive.

*Right to rectification* – you have the right to request that we correct any inaccuracies in the personal data stored about you.

*Right to erasure* – in certain circumstances, you have the right to request that we erase your personal data. For example, you may exercise this right in the following circumstances:

- Your personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed by us.
- Where you withdraw consent and no other legal ground permits the processing.
- Where you object to the processing and there are no overriding legitimate grounds for the processing.
- Your personal data has been unlawfully processed.
- Your personal data must be erased for compliance with a legal obligation.

NOTE: Where we store your personal data for statistical purposes, we may not be able to comply with such a request where it would likely impair such statistical purposes or where we require your personal data for compliance with a legal obligation or in connection with legal proceedings.

*Right to restriction* – you have the right to restrict our processing of your personal data where any of the following circumstances apply:

- Where you feel that the personal data which we hold about you is not accurate. This restriction will be in place for a period to enable us to verify the accuracy of your personal data.
- Where the processing is unlawful, and you do not want your personal data to be erased and request the restriction of its use instead.
- Where we no longer need to process your personal data, (e.g. any of the purposes outlined above have been completed or expire), but we require it in connection with legal proceedings.
- Where you have objected to our processing of your personal data pending the verification of whether or not our legitimate business interests override your interests, rights and freedoms.

#### **THE LEGAL BASIS WE RELY ON:**

The law on data protection sets out a number of different reasons for which a company/charity may collect and process your personal data, including:

Consent: In specific situations, we can collect and process your data with your consent. For example, in our future development we may have the option to tick a box to receive email newsletters within

2023-24/11/20 v1

our website. When collecting your personal data, we can always make clear to you which data is necessary in connection with a particular service.

Contractual obligations: In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you book a course or stay with us, we will collect your address and health/dietary/medical details in order to send you booking/activity information that best suits your needs.

Legal compliance: If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity to law enforcement. We may also have to pass data to regulatory or governing bodies.

We may use your data to send you communications required by law such as updates to our Privacy Policy or to comply with any legal obligation to provide data to police.

**AMENDMENTS:**

We may amend this Privacy Policy from time to time. When we amend this Privacy Policy, we will update this page accordingly and require you to accept the amendments in order to be permitted to continue using our services.

**CONTACTING THE REGULATOR:**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns), (opens in a new window; please note we can't be responsible for the content of external websites). If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

**ANY OTHER PRIVACY QUESTIONS:**

If you have any privacy related concerns, please don't hesitate to contact us.

The Roseland Centre

St. Just-in-Roseland

Truro

Cornwall

TR2 5JA

Email: [enquiries@theroselandcentre.org](mailto:enquiries@theroselandcentre.org)