**GLC Story Privacy Policy**

**1. About this Policy**

This website is operated by ‘A Greater London: the GLC Story 1981-86’ (from now on GLC Story), a registered Community Interest Company, and is available to you on the basis of the terms below. Our registration number is 09891431.

GLC Story is committed to protecting and respecting personal privacy. We collect as little information as possible from supporters, however there is a minimum of information that we need to have in order to run the organisation.

This policy explains what information the GLC Story holds on you, why we hold it, and how it gets used. Please read the policy to understand our views and practices in relation to storing and using personal data. Please also note that we may need to change this policy from time to time, so please check this page occasionally to ensure you’re happy with any changes. By accessing and using our website, you’re accepting these terms of use.

If you have any questions about the policy or GLC Story’s use of personal information, please email info@glcstory.co.uk

**2. The information we collect, and why we collect it**

‘Personal data’ is defined as information relating to an identified or identifiable natural person (examples might include a person’s name, age, address, date of birth, gender and contact details). GLC Story will never sell, trade or rent your personal information to others, and would only share personal data with authorised third parties where we are required to do so by law or for regulatory or statutory purposes.

We collect the following personal data:

For Supporters, we collect information provided to us for the purpose of subscribing to email updates / newsletters, which includes your name and email address.

Some information is also collected automatically from anyone who visits our site: this includes what pages you view, the number of bytes transferred, the links you click, the materials you access and other actions taken within our site. We also collect certain standard information that your browser sends to every website you visit, such as your Internet Protocol (IP) address, your browser type and capabilities and language, your operating system, the date and time you access the site and the website from which you linked to one of our sites. We do not combine this standard information with other personal information.

Some other kinds of information we collect:

* If you contact us, we may keep a record of that correspondence;
* Information we gather on social media (including, but not limited to, Twitter);
* Feedback from you about our website or GLC Story generally;
* Any other information that you choose to send to us.

If you object to the collection and use of your personal data as described here we may be unable to keep you involved or updated about GLC Story, due to data regulation requirements. Please see section 9 for more information about your rights and objections.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

**3. How we use your personal data**

Your data is primarily used in our general day-to-day work. This includes:

* sending you general (non-marketing) communications;
* sending you email notifications which you have specifically requested;
* administering our website and for internal operations such as troubleshooting, data analysis or research
* dealing with enquiries and complaints made by or about you in relation to GLC Story

**Third-party communications services:**

We use the third-party email service MailChimp. This is to manage our list of subscribers and email communications to you, and MailChimp Acts as a data-processor on behalf of GLC Story.

MailChimp is a US company and has staff based outside the EEA, and stores your data in the US. MailChimp is certified under the [EU-US Privacy Shield framework](https://www.privacyshield.gov/). When you sign up to our email alerts, you agree to your data being stored in this way.

As a subscriber to our newsletter, we may contact you from time to time to ask for your feedback on how to improve our email alert service.

As a data processor on behalf of GLC Story, MailChimp will use your information to send you email alerts if you request them. You can find out more about [how MailChimp collects and stores your information](https://mailchimp.com/legal/privacy/).

**5. Our legal basis for processing personal data**

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Three of these are relevant to the types of processing that we carry out. This includes information that is processed on the basis of: a person’s consent; processing that is necessary for compliance with a legal obligation; ‘legitimate interests’ (see below).

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

Our legitimate interests include:

* **Good Governance:** including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes, engaging and involving our members in the democratic governance of the GLC Story
* **Administration and operational management:** including responding to inquiries, providing information, and events management, and most importantly keeping our membership informed and involved in the GLC Story

**6. Disclosure of your personal data**

We will not share, sell or rent any of your personal data to any third party unless we are required to do so by law, for example to law enforcement or regulatory bodies where this is required under the relevant legislation. We will not share your information with third parties for marketing purposes.

**Third Party Service Providers working on our behalf**

We may pass your information to our third-party service providers, agents subcontractors and other associated organisations (e.g. hosting website, web agency, etc.) for the purpose of completing tasks and providing services to you on our behalf (e.g. to send you mailings or check web analytics). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have an agreement in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. 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.

**Other disclosures**

In addition to the disclosures described elsewhere in this privacy policy, we may disclose information about you in connection with any legal proceedings or prospective legal proceedings; in order to establish, exercise or defend our legal rights.

**7. Security of your personal data**

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot 100% guarantee the security of your data transmitted to us. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

**How do we protect your personal information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We also use an SSL certificate to ensure that your privacy is protected while visiting our website. An SSL certificate (also known as HTTPS) is a layer of protection between our website and your browser. Short for Secure Sockets Layer, an SSL is used to encrypt potentially sensitive information like the input fields in a contact form.

**8. Retention of your data**

Mailing list subscriber data will only be kept as long as you wish to receive emails from us.

**9. Your Rights**
Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data. These rights are known as Individual Rights under the Data Protection Act 2018. Individuals can exercise their Individual Rights at any time.

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for regulatory and other statutory purposes.

Your rights include:

**Right of Access**

* You have the right know what information we hold about you and to ask, in writing, to see your records.
* We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances.
* You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

**Right to be informed**

* You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

 **Right to withdraw consent**

* Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the ‘Contact us’ section below.

**Right to object**

* You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the ‘Contact us’ section below.
* You also have the right to complain to the UK’s data protection supervisory authority, the Information Commissioner’s Office (ICO). The ICO may be contacted via its website which is <https://ico.org.uk/concerns/>, by live chat or by calling their helpline on 0303 123 1113.

**Right to restrict processing**

* In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

**Right of erasure**

* In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

**Right of rectification**

* If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the ‘Contact us’ section below.

**Right to data portability**

* Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

**10. Third Party Websites**

This website may contain links to and from the websites of groups or organisations that have been funded by GLC Story or involved with GLC Story in other non-commercial ways. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.  Please check these policies before you submit any personal data to these websites.

**11. Contact us**

If you have any questions, queries, or concerns about any of this, please get in touch by contacting info@glcstory.co.uk or through the contact form on this website. Your views on our data protection and privacy policy are important to us!