



Statement of intent:

We at Mortal Fools (Company No 08102487 Charity No 1153400) are committed to safeguarding your privacy. At all times we aim to respect any personal data you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy sets out our data collection and processing practices and your options regarding the ways in which your personal information is used.

Should you need to contact anyone at Mortal Fools regarding this policy please address your query to:

Kiz Crosbie (CEO) – Data Protection Officer (07779 579558)

Richard Wise (Chair of Trustees) – Data Protection Lead (07879 605485)

Write to: Mortal Fools, Spetchells Centre, 58 Front Street, Prudhoe, NE42 5AA

c/o email: info@mortalfools.org.uk

Phone: 0191 5801250

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal data. Our privacy policy is reviewed regularly to ensure that it reflects how we use your information. Any changes will be notified to you by updating this policy so please check back to see if any changes have been made that are important to you. The most recent policy will always be available on our website www.mortalfools.org.uk

Where appropriate changes will be notified to you by email.

This privacy policy was last updated on 05/05/2020.

Data protection law:

The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. It requires personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of individuals;
6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
7. The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

The provision of your personal data to us is voluntary. Providing us with your personal data means you will be able to receive our expert resources, participate in our programmes, access our training, attend our meetings, make a donation, participate in our programmes and apply for employment, volunteering or other work with us.

How we collect personal information about you:

We may collect personal information from you when you interact with Mortal Fools. There are lots of different examples of interaction which include: If you enquire about our work, or our events, if you make a donation, or apply for a job or volunteer with us or otherwise provide us with personal information. This may be when you phone us, email us, visit our website, sign up to attend a project, event or training session, through the post or in person.

You may give us personal information DIRECTLY

- To access specialist resources
- To attend our training
- To attend meetings, projects or events
- When you share information from our website on social media (such as; Facebook, Twitter, LinkedIn, Instagram)
- When you apply for employment, volunteering or other work
- When you purchase or book any products or services from us
- When you register for any of the programmes we deliver

You may also give us personal information INDIRECTLY:

- Your information may be shared with us by others, including our partners, users of our services and other stakeholders, accrediting bodies, employment agencies, when you follow us or otherwise interact with on or via Twitter, when you like and/or join our page on Facebook or interact with us in other ways online or via Facebook through these companies.

You may give permission to OTHER ORGANISATIONS to share it or it is PUBLICLY AVAILABLE INFORMATION

- We may combine information you provide to us with information available from external publicly available sources.

- Depending on your privacy settings for social media services, we may also access information from those accounts or services.
- Our partners may share relevant personal information with us about you as part of project activities and monitoring.

We use this information to gain a better understanding of you and to improve our communications, our working practices, our business offer and fundraising activities.

What information do we collect?

We may collect, store and use the following kinds of personal data:

- Your name and contact details
- The organisation(s) you work for
- Postal address
- Telephone number
- E-mail address
- Social media identity
- Information about the services you use
- Services and products of interest to you
- Marketing and/or communication preferences
- Information about your computer and about your visits to and use of our website including your IP address, geographical location, browser type, referral source, length of visit and number of page views
- Any other information you have chosen to share with us

However, we may request other information where it is appropriate and relevant, for example

- Details of why you have decided to contact us and notes relating to any discussions in person or electronically
- Special education or access needs, if they are appropriate, for example if you are participating in our activities
- Your bank details or debit/credit card details for processing payments
- Photographic or video images of your likeness
- Details of your interests and participation in our work, surveys you have completed, etc

Do we process sensitive personal information?

Applicable law recognises certain categories of personal information as sensitive and therefore require more protection including information for equal opportunities monitoring (where appropriate). We may also collect and store sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent or where the law requires us to do this.

How and why will we use your personal data?

Personal data, however it has been provided to us, will be used for the purposes specified in this Policy.

We may use your personal information to:

- Enable you to use any and/or all of the services we offer
- Send you information about our work, campaigns, programmes and any other information, products or services that we provide. The channels we will use to do this are: phone, email, direct mail and digital advertisements (this will not be done without your consent and you may specify which channels of communication you prefer)
- Provide you with the services, products, programmes or information you have requested
- Handle the administration of any donation or other payment you make via credit/debit card, cheque, standing order or BACS transfer
- Collect payments from you or make payments to you e.g. refund of fees paid
- Handle the administration of your employment, volunteering or any other work you apply for and are engaged on
- Conduct research into the impact of our programmes
- Deal with enquiries and complaints made by or about you relating to our activities or us in general
- Make applications for accreditation by third parties, where you have registered e.g. Arts Award
- Audit and/or administer our accounts.

Supporter and Stakeholder research/profiling

We may use your personal information to undertake research to gather further information about you from publicly accessible sources. This helps us to get a better understanding of your background, interests and preferences in order to improve our communications and/or interactions with you, to help ensure they are targeted to be relevant and appropriate, and to provide information (sometimes through third parties) about our services which we consider may be of interest to you.

Communications, fundraising and marketing

Where you have provided us with your physical address, we will contact you by post; and where you have provided appropriate consent, also by telephone and e-mail, with targeted communications to let you know about our work, events, programmes and other activities that we consider may be of particular interest about the work of Mortal Fools and to ask for donations or other support.

Donations and other payments

All financial transactions carried out online are with third party payment services providers, currently Brown Paper Tickets and PayPal. We recommend that you read their privacy policies

<https://www.brownpapertickets.com/privacy-policy.html>

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

We will provide your personal data to these organisations only to the extent necessary for the purposes of processing payments for transactions you enter into with us. We reserve the right to change our third party payment service providers subject to the needs of our business, without need for notice, this Privacy Policy should therefore be checked regularly for updates. We do not store your financial details for any of these web-based payments.

For any payments we receive or make directly via BACS, these will be made through our bank account, currently with Triodos Bank Plc. For these transactions, your financial details will be stored securely in their banking system. You can read their Privacy Statement at <https://www.triodos.co.uk/en/about-triodos/important-information/privacy-statement/>

Online communication platforms

We may provide you with some activities, services, meetings via third party online meeting platforms. Those we are currently using are Zoom and Facebook.

We have put in place practices to maximise the security of those using the platforms for our activities, including password protection for meetings, use of waiting room functions and not displaying full names. Full details of these practices can be found in our *Online Safeguarding Policy* – available on request. We recommend that you read the respective Privacy Policies of these third party providers, which can be found below.

<https://zoom.us/privacy>

<https://www.facebook.com/policy.php>

[https://www.facebook.com/legal/FB Work Privacy](https://www.facebook.com/legal/FB_Work_Privacy)

Children's data

We may process data of people under the age of 16 that participate in our programmes. Where we do this, access to this information is limited to those staff requiring it in order to run the activities and programme with the children and to provide necessary reporting only to our funders. We will securely store this information for a reasonable period and as required by company, funder or for legal reasons.

Other disclosures

We will disclose your information to regulatory and/or government bodies and/or law enforcement agencies upon request only when required to do so in order to satisfy legal obligations which are binding on us.

Security of and access to your personal data

We take the security of your personal information extremely seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and offline, from improper access, use, alteration, destruction and loss.

Your information is only accessible by appropriately trained staff, volunteers and contractors.

We may also partner with other organisations and in so doing transfer and/or acquire personal data.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with third parties with your explicit consent.

We recognise that when you interact with third party providers like Facebook, Zoom, PayPal and Brown Paper Tickets as part of our activities, responsibility for the security of your data lies with those providers. We will ensure that, where possible, selected settings for storage of data are at the highest level of security and compliant with GDPR.

Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

- Right to be informed
 - You have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- Right of access
 - You can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we have 40 days to comply. As from 25 May 2018, we will have 30 days to comply.
- Right of erasure
 - As from 25 May 2018, you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it so that we have evidence of your request for audit purposes.
- Right of rectification
 - If you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- Right to restrict processing
 - You have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- Right to data portability
 - to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information under your consent, because such processing is necessary for the performance of a contract to which you are party, to take steps at your request prior to entering into a contact or by automated means, you may ask us to provide this information to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details below. Email communications will include the option to unsubscribe from our email list.

Where we consider that the information which you have provided us does not enable us to identify the personal information in question, we reserve the right to ask for personal identification and/or further information.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult ICO guidance – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> – or please contact us using the details below.

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner’s Office (“ICO”). For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>. The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

Lawful processing

We are required to have one or more lawful grounds to process your personal information. Only 4 of these are relevant to us:

1. Personal information is processed on the basis of a **person’s consent**
2. Personal information is processed on the basis of a **contractual relationship**
3. Personal information is processed on the basis of **legal obligations**
4. Personal information is processed on the basis of **legitimate interests**

(1) Consent

We will ask for your consent to use your information to contact you by phone, send you electronic or postal communications such as newsletters and marketing and fundraising emails, for targeted advertising and profiling, and if you ever share sensitive personal information with us. Where our programmes are enhanced by the sharing of information (ie Local Cultural Education Partnerships, training) we will ask your consent to share with other relevant parties.

(2) Contractual relationships

Most of our interactions with subscribers and website users are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us, if you book on our events or participate in programmes.

(3) Legal obligations

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

(4) Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals’ rights).

We will rely on this ground to process your personal data when it is not practical or appropriate to ask for consent.

Achieving our purposes

These include (but are not limited to) for the benefit of the public particularly but not exclusively in the north of England, the Company's Objects are, through the encouragement and practice of the arts in all their forms:

- (1) To promote, maintain, improve, and advance education;
- (2) To develop the capacity and skills of the members of disadvantaged communities in such a way that they are better able to identify and help meet their needs, and to participate more fully in society.

Governance

- Internal and external audit for financial or regulatory compliance purposes
- Statutory reporting

Publicity and income generation

- Conventional direct marketing and other forms of marketing, publicity or advertisement
- Unsolicited commercial or non-commercial messages, including newsletters, income generation, charitable fundraising or campaigns
- Analysis, targeting and segmentation to develop and promote or strategy and improve communication efficiency
- Dissemination of our work through our website, publications, conferences, training events and social media
- Personalisation used to tailor and enhance your experience of our communications

Operational Management

- Employee, contractor and volunteer recording and monitoring for recruitment, safety, performance management or workforce planning purposes
- Provision and administration of staff benefits such as expenses
- Physical security, IT and network security
- Maintenance of suppression files
- Processing for historical, scientific or statistical purpose
- Meetings and training using third party online meeting platforms

Purely administrative purposes

- Responding to enquiries
- Delivery of requested products or information
- Communications designed to administer existing services including administration of programmes and financial transactions
- Thank you communications and receipts
- Maintaining a supporter database and suppression lists

Financial Management and control

- Processing financial transactions and maintaining financial controls

- Prevention of fraud, misuse of services, or money laundering
- Enforcement of legal claims
- Reporting criminal acts and compliance with law enforcement agencies

When we use your personal information, we will 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 legally and fairly.

Data retention

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information from our records after 5 years. However, if before that date your personal information is no longer required in connection with such purpose(s), we are no longer lawfully entitled to process it or you validly exercise your right of erasure, we will remove it from our records at the relevant time.

In the event that you ask us to stop sending you direct marketing/fundraising/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

Policy amendments

We keep this Privacy Policy under regular review and reserve the right to update from time-to-time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of any important changes to our privacy policy by email.

Third party websites

We link our website directly to other sites. This Privacy Policy **does not** cover external websites or third party online platforms and **we are not responsible** for the privacy practices or content of those sites and providers. We encourage you to read the privacy policies of any external websites or providers you visit via links on our website or as part of participating activities with us. Updating your information on third party websites will not be shared with us unless you give consent or there is a legal or contractual reason for processing.

Updating information

You may ask us at any time to update your details, correct or remove information you think is inaccurate or to check the information we hold about you by contacting us via post or email

Breaches


Any data breaches will be reported to the Information Commissioners Office (ICO) within 72 hours. You will also be notified any breach, the nature of this, what has happened, the likely consequences and any action being taken by us. You will also be provided with contact details of the person to refer to for more information.

Contact

Please let us know if you have any queries or concerns whatsoever about the way in which your data is being processed by either emailing us at info@mortalfools.org.uk, telephone 0191 5801250 or writing to us at Mortal Fools, Spetchells Centre, 58 Front Street, Prudhoe, NE42 5AA.

Data Protection Officer – Kiz Crosbie (CEO) 07779 579558

Data Protection Lead – Richard Wise (Chair of Trustees) 07879 605485

Date Policy First Adopted:	28 th March 2019
Date of latest review:	5 th May 2020
Policy Review Signed off by:	
Scheduled next Review date:	April 2021