

DATA POLICY

POLICY PREPARED BY: SHANE HOLLAND DATA PROTECTION OFFICER

APPROVED AND EFFECTIVE 08/02/2017

REVIEWED: ON ANNIVERSARY OR SOONER AS REQUIRED

Slow Food in the UK needs to gather and use certain information about individuals. These can include members, interested people, event attendees, suppliers, business contacts and other people the organisation has a relationship with or may need to contact.

Personal information means information which relates to a living individual who can be identified from that information such as names, e-mail addresses, personal home addresses, personal phone numbers, personal bank account details, personal description and photograph, etc. ("Personal Information").

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

Slow Food in the UK ("we", "our", "us") are committed to protecting and respecting Personal Information. We will treat Personal Information securely.

We are the data controller for the purpose of the Data Protection Act 1998 and the General Data Protection Regulation (Regulation (EU) 2016/679) ("Data Protection Legislation").

If you have any questions, comments and requests regarding your Personal Information (including how to object to us processing your Personal Information) please contact: info@slowfood.org.uk

If you are unhappy with how we handle your Personal Information, you can notify the Information Commissioner's Office (ICO) by calling their helpline on: 0303 123 1113 and quote our registration number which is **ZA166929**



WHY THIS POLICY EXISTS

This data protection policy ensures Slow Food in the UK:

- 1. Complies with data protection law and follow good practice
- 2. Protects the rights of supporters, customers, staff and partners
- 3. Is open about how it stores and processes individuals' data
- 4. Protects itself from the risks of a data breach

DATA PROTECTION LAW

The Data Protection Act 1998 describes how organisations — including Slow Food in the UK— must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

- 1. Be processed fairly and lawfully
- 2. Be obtained only for specific, lawful purposes
- 3. Be adequate, relevant and not excessive
- 4. Be accurate and kept up to date
- 5. Not be held for any longer than necessary
- 6. Processed in accordance with the rights of data subjects
- 7. Be protected in appropriate ways
- 8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

SHARING YOUR DATA WITH SLOW FOOD IN THE UK

The following sections detail the various ways that you can share your data with Slow Food in the UK and the personal data collected, the purpose(s) we use the data for and the legal basis for processing your data for the intended purpose(s).

BECOMING A MEMBER OF, OR MAKING A DONATION TO, SLOW FOOD IN THE UK

This section sets out the Personal Information we collect about our members and donors, the purpose(s) we use your Personal Information for and the legal basis for processing your data.

Slow Food in the UK (SFUK) I Kemp House I152 City Road I London I EC1V 2NX I slowfood.org.uk



PERSONAL INFORMATION COLLECTED

CARD & BANK ACCOUNT DETAILS

Card & bank account details are collected and passed to our payment processors (Note that for security reasons card and bank details are not stored by Slow Food in the UK).

SUBSCRIPTION OR DONATION AMOUNT INFORMATION

The amount you wish to pay, where monthly or annually, the start date, the end date, whether you have been a member or donated before, and the means you wish to make payment – by direct debit or by debit or credit card.

CONTACT DETAILS

Your Email Address.

GIFTEE INFORMATION

If you are gifting membership, or if you are making a donation on behalf of someone else we will collect contact details of the giftee.

WHAT WE DO WITH YOUR DATA

CARD & BANK ACCOUNT DETAILS

This data is used to process your donation. (Note that for security reasons & PCI Compliance; card and bank details are not stored by us and are retained by our payment providers).

MEMBERSHIP OR DONATION – THE AMOUNT, FREQUENCY, DATE AND METHOD OF YOUR DONATION

This information is used as a record of your membership and to enable us to provide receipts and to process your membership subscription. It also allows to inform you when you are due to renew. We also want to send the most effective messages that we can in the most efficient way possible, so in order to work out who to contact, what to say and when to get in touch, we analyse your membership information.

CONTACT DETAILS

- 1. Your email address is used so the payment processor can send you your receipt.
- 2. If you have provided your consent, your contact details are also used to provide you with updates on our projects and information we think is relevant about our work and campaigns.



GIFTEE INFORMATION

This data will be used to send the giftee their certificate.

LEGAL BASIS

CARD & BANK ACCOUNT DETAILS

Necessary for the performance of a contract.

MEMBERSHIP INFORMATION – THE AMOUNT, DATE AND METHOD OF YOUR FEE OR DONATION

Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your membership/donation information for the purposes outlined and that your fundamental rights are not harmed in doing so.

CONTACT DETAILS

- 1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your Contact information for the purposes outlined and that your fundamental rights are not harmed in doing so.
- 2. Consent: On the basis of your consent only.

GIFTEE INFORMATION

The email is solicited marketing so does not require consent.

SUBSCRIBING TO SLOW FOOD IN THE UK'S EMAIL UPDATES

This section sets out the Personal Information we collect about our subscribers, the purpose(s) we use your Personal Information for and the legal basis for processing your data.

PERSONAL INFORMATION COLLECTED

CONTACT DETAILS

- 1. Your first and last name.
- 2. Your Email address.

WHAT WE DO WITH YOUR DATA

CONTACT DETAILS

- 1. We use your name so that we can address you personally when we get in contact.
- 2. We use this to send you our communications (note we are a digital only organisation).

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LEGAL BASIS

CONTACT DETAILS

- 1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your donation information for the purposes outlined and that your fundamental rights are not harmed in doing so.
- 2. Consent: On the basis of your consent only.

SUBMITTING A CONTACT FORM TO SLOW FOOD IN THE UK

This section sets out the Personal Information we collect when you submit a contact us form to Slow Food in the UK, the purpose(s) we use your Personal Information for and the legal basis for processing your data.

PERSONAL INFORMATION COLLECTED

CONTACT DETAILS

- Your first and last name.
 Your Email address
 Your Message

WHAT WE DO WITH YOUR DATA

CONTACT DETAILS

- 1. We use your name so that we can address you personally when we respond to your
- 2. Your email address is used to reply to your enquiry. If you have provided your consent, your contact details are also used to provide you with updates on our projects and fundraising activities.

LEGAL BASIS

CONTACT DETAILS

1. Legitimate Interest: We believe based on our assessments that it is in our legitimate interests to process your name for the purposes outlined and that your fundamental rights are not harmed in doing so.

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2. This is not a marketing email so does not require your consent. Your email address will only be used to send you marketing emails if you have given your consent.

SHARING PERSONAL INFORMATION

Depending on the context we may share your Personal Information with the following organisations:

- 1. Paypal (UK_ LTD, a company incorporated under the Companies Acts in England (Company Number: 05468033) with its Registered Office address at New Street Square, London, EC4A 3TW to process your membership or donation and send you a receipt.
- First Capital Cash Flow Direct Debit Processing trading as First capital Cashflow LTD, a
 company incorporated under the Companies Acts in England (Company Number: 03986072)
 with its Registered Office address 16 Daresbury Court Evenwood Close, Manor Park,
 Runcorn, Cheshire, United Kingdom, WA7 1LZ to process your membership or donation and
 send you a receipt.
- 3. Slow Food International, our parent organisation with its registered office address at Slow Food, Piazza XX Settembre, 5 12042 Bra (Cuneo), Italy, as we share membership data for global recognition.
- 4. Mailchimp a trading name of Rocket Science Group LLP, a company incorporated in Atlanta USA with its registered address at 1526 DeKalb Ave NE, Atlanta, GA 30307, USA if you become a member, donor or submit an email address.
- 5. Appropriate contractual agreements are in place to ensure all personal information is stored and processed securely.

TRANSFER OF PERSONAL INFORMATION OUTSIDE OF THE EEA

Slow Food in the UK is an International charity and on occasion, your personal data may be transferred outside of the EEA. Such transfers will only occur where strictly necessary and either contractual clauses or data sharing agreements will ensure that your data will be processed with the same protections in place as in the EEA.

RETENTION PERIODS

We will not hold your Personal Information for any longer than is necessary for the "uses" outlined above, unless we are required to keep your Personal Data to comply with the law and any regulatory requirements. Specifically should your membership lapse and you do not give us further consent to contact you we will not contact you after three months except to remind you that your membership has lapsed, and we will delete all your data at six months. Likewise, if you give us consent to hold data for a specific purpose (such as volunteering) and you do not carry that activity out for a period of six months, then we shall delete all your data at the six month anniversary of your last interaction with us.



YOUR RIGHTS

Under the Data Protection Legislation you have certain rights in relation to your Personal Data:

- 1. You have the right to access the Personal Information we hold about you by making a subject access request in accordance with the Data Protection Legislation. Until 25 May 2018 we may charge a fee of £10 for any requests. After 25 May 2018 we may charge a reasonable fee when a request is manifestly unfounded or excessive. You can make your request to: info@slowfood.org.uk
- 2. You have the right to have your Personal Data rectified if it is inaccurate or incomplete. You can exercise your request by contacting: info@slowfood.org.uk
- 3. You have the right to have your Personal Information deleted in certain specific circumstances.
- 4. You have the right to restrict the processing of your Personal Information in certain specific circumstances.
- 5. You have the right to withdraw your consent at any time.

To use your rights, please contact info@slowfood.org.uk

PEOPLE WHO WILL ACCESS YOUR DATA

The individuals who access your data shall be officers of Slow Food UK Trust; and can be Directors, Nation Officers, or Local Group Officers. They shall not use or store your data for any purpose which is not outlined above.

DISCLOSURES

When you provide us with personal information you are sharing that information with us alone unless stated otherwise. We will only disclose personal information to successors in title to our business and suppliers we engage to process data on our behalf. We will not share your information with any other third parties, outside of those specified in this policy, unless you opt-in and authorise us to do so.

OTHER WEBSITES

Our website may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

CHILDREN'S PRIVACY

No information should be given on this website by children under the age of 16. No sharing of data collected from children with any third parties is permitted at any time under any circumstances and all applicable laws with respect to data collection from children are followed.