# So South Bank & Waterloo Neighbours

# Privacy and Cookies policy

This Privacy Policy sets out how SoWN ('we', 'our', 'us') uses and protects any information that you give to us in connection with you use of the website or in a direct connection with you as levy payer, trader, customer, partner or supplier. SoWN is committed to ensuring that your privacy is protected. We might ask you to provide certain information by which you can be identified when using the Sowneighbours.co.uk website (website only) and your data will only be used in accordance with this Privacy Policy.

#### Who Are We?

South Bank & Waterloo Neighbours (SoWN) is the formally designated neighbourhood forum for the South Bank and Waterloo neighbourhood area, and an unincorporated body.

### What information do we collect from you?

#### Non-Automated Collection of Personal Information:

Where you are required via our website to provide personal data or when we collect personal data from you in any other way (i.e. customer website, business cards, face-to-face meetings, email, any other lists). We will use this data internally and it will not be revealed to any other third parties that do not have previous contract, legal or legitimate interest to request this information to us.

This may include information found in places such as Companies House, your biography on your work website or information that has been published in articles/ newspapers

All the information that you provide to us will remind confidential and accessible only by those who have a legitimate need to know within our organization.

#### Automated collection of Personal Information:

As with most other servers, when you access to these web pages, certain information you provide will automatically recorded. This will include your IP address, browser type and information relating to the page you last visited. This information is processed to estimate how much usage of the server is made by different categories of users and in the event of a breach of security may be used to aid detection (Server Logs<sup>i</sup>, Cookie data).

### Social Media

We use social media to broadcast messages and updates about events and news. On occasion we may reply to comments or questions you make to us on social media platforms. You may also see notifications from us on social media that are tailored to your interests. Depending on your settings or the privacy policies social

media and messaging services like Twitter, you might give third parties (like SoWN) permission to access information from those accounts or services.

# Why do we collect this information?

We require this information to understand your needs and provide you with a better service and in particular for the following purposes:

- Internal record keeping
- To identify you
- For the improvement and delivery of any services or events we may provide
- To administer and manage your membership
- To ensure that content from the website, newsletters or social media is presented on the most effective manner
- Where appropriate to customise the website according to your interests
- To contact you for marketing purposes

## Who might we share this information with?

We may share the information collected from you with any other third parties that work in partnership with us, to give you a better service. We may share that information with the following third parties: <a href="Eventbrite">Eventbrite</a>, <a href="Survey Monkey">Survey Monkey</a>, Public Bodies.

# What do will we do with your information?

Your personal data will be held and processed by SoWN's systems or systems managed by suppliers on behalf of SoWN. We maintain a speadsheet to hold contact details and a record of our members and partners interactions with SoWN such as queries, complaints and attendance at events.

We collect, store and process your personal data under the 'Legitimate Interest' and 'Consent' basis of processing data defined on the GDPR (Article 6(1) (F) and Recitals 47,48 & 49; Article 4 (11) 6 (1) (A), 7,8 & 9 (2) and Recitals 32, 38, 40, 42,43 & 171, respectively) to give you and your business a high quality service. We use this information to provide you with information relating to the SoWN purposes and services. We keep this information in our databases to make sure we offer the right service and to communicate with you about any local issues that may concern your business.

By providing your personal data in any of the ways described on this Policy, you agree that we may collect, store, process or transfer this data. Access to customer information is strictly controlled. The CRM system can only be accessed by the SoWN secretary and Chairman.

# How long do we keep this information?

We will keep your personal information as long as you remain a member. If you inform us that you no longer wish to be a member we will delete your data from the spreadsheet and any third party suppliers' records.

#### Security

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and under <u>GDPR</u> provisions. All data provided by you will be stored and classified on our secure servers. We never ask you to supply sensitive information and if you divulge any ingormation which is sensitive, we do not retain it.

Unfortunately, the transmission of the information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the website; any transmission it is at your own risk. Once we have received your information, we will use suitable physical, electronic and managerial procedures and security features to safeguard the information we collect

from you online or directly; and try to prevent any unauthorized access. In case of any data breach of personal data, this will be reported immediately to the <u>ICO</u> to mitigate the effects of the breach.

#### How we use cookies?

A cookie is a small file placed on your computer's hard drive which, with your permission, tracks your use of websites.

Cookies also allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. The SoWN website does not use cookies.

#### Links to other websites

Our website may contain links to other websites of interest. Any link (be it a hypertext link or other referral device) used on the sowneighbours.co.uk website is provided solely for convenience of the users. A link does not represent any endorsement or recommendation by us and does not mean that we have any association with the linked site. Once have used these links to leave our site, you should note that we do not have any control over the other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

# Right of access and rectification

You may request a copy of the personal information which we hold about you at any time in accordance with the General Data Protection Regulations (<u>Articles 12 and 15, Recital 63</u>) or any of your rights listed below, by writing or emailing to us your request of this information.

- The right to be informed
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- · Rights in relation to automated decision making and profiling

We may charge you a small fee for this request if this request carries an excessive amount of work, is repetitively requested or unfounded. This amount will be based on the administrative costs resulting of providing this information.

If you believe that any information that we are holding on you is incorrect or incomplete, please write or email us as soon as possible and we will use all the reasonable endeavours to correct any information found to be incorrect on our databases.

You agree that any personal information you provide to us will be true, complete and accurate in all aspects and you agree to notify us immediately of any changes to it.

### Contacting Us

You should check this page from time-to-time to ensure that you are happy to with any changes. (Website only)

If you wish to change how we contact you or have any questions or complaints about the ways in which we process your personal data, you should contact with our Data Protection Officer: Ben Stephenson

By post: SoWN c/o We Are Waterloo, Build Studios, 203 Westminster Bridge Road, London, SE1 7FR.

By Email: <u>bstephenson@wearewaterloo.co.uk</u>

By Phone: 020 7620 1201

.\_\_\_\_\_

<sup>&</sup>lt;sup>1</sup> Information about the pages you requested, including your IP address, request date/time, HTTP code, bytes served, user agent, and referrer are typically collected. This data can be combined into a single file, or separated into distinct logs, such as an access log, error log, or referrer log. These files are only accessible to the webmaster or other administrative person in the server/datacentre supply chain. A statistical analysis of the server log may be used to examine traffic patterns by time of day, day of week, referrer, or user agent. Efficient web site administration, adequate hosting resources and detection of any breach can be aided by analysis of the web server logs. Raw logs may only contain a few hours' worth of data because they are discarded after the system processes them. As archiving is enabled, the system archives the raw log data before the system discards it. Archive logs are removed at the end of each month