

PRIVACY NOTICE

LOCO HOME RETROFIT CIC LIMITED

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WHAT IS A PRIVACY NOTICE?

The UK General Data Protection Regulation (UK GDPR) requires that data controllers provide certain information to people whose information (personal data) they hold and use. A privacy notice is one way of providing this information. This is sometimes referred to as a fair processing notice.

This privacy notice tells you what to expect us to do with your personal data when you make contact with us or we interact with each other.

WHAT IS IN THIS PRIVACY NOTICE?

In this privacy notice we tell you

- Who we are and how you can make contact with us
- What personal data is collected and used
- The legal basis for processing your personal data
- How we use your personal data including when we disclose your personal data to others
- How long we keep your personal data

OUR CONTACT DETAILS

Loco Home Retrofit CIC Limited, registered with Companies House, 23 June 2021, company number SC702417

ADDRESS: Civic House, 26 Civic Street, Glasgow G4 9RH

PHONE: 0141 266 0321

EMAIL: info@locohome.coop

WHY WE HAVE YOUR INFORMATION, WHAT IT IS, HOW WE COLLECT IT AND STORE IT

There are different reasons why we collect and process information about you.

You make an inquiry about our organisation and the work we do

- **How collected:** you provide us with your contact details via email, a form on our website, or in-person if we meet you (e.g. you give us your business card).
- **Data:** your name, email and accompanying information.
- **Legal basis:** we have a legitimate interest - it is necessary for us to read and store your information so we can respond in the way that you would expect.
- **How we store this data:** Your information is securely stored in our email system, hosted by a class leading email solutions provider. Your information may also make its way into our Customer Relationship Management (CRM) system, being one or more spreadsheets hosted by a class leading cloud-based office productivity solutions provider. Two factor authentication is enabled on these accounts, and only authorised persons are able to access the information. We will delete your data five years after the information is no longer used.

You browse our website (essential cookies)

- **How collected:** Cookies are a type of online identifier, used by services installed on our website, or used by services provided via our website. They are text files with small pieces of data, used to identify the computer device of a data subject. Cookies are "name value pairs", meaning a version of the cookie is stored on our web server and also saved on your computer device.
- **Data:** your computer device; information identifying you via the computer device you use to access our website.
- **Legal basis:** we have a legitimate interest - most people would reasonably expect a website to provide essential functionality enabled by the use of simple cookies. Only information related to the unique identifier of your computer device and internet browser software are stored for essential cookies. Without cookies, certain essential functions related to the website would not be possible, such as providing information to the user about the use of cookies on the website.
- **How we store this data:** Cookie data is "name value pairs" - two versions of the cookies are generated by our web server. One copy is sent to your computer and stored there, the other copy is kept on the server. Cookies have expiration durations set, defining when the cookie expires and is deleted. The maximum auto-expiration duration we use for cookies is two years.

You browse our website (optional cookies)

- **How collected:** Cookies are a type of online identifier, used by services installed on our website, or used by services provided via our website. They are text files with

small pieces of data, used to identify your computer device, browser details and other personal information. Cookies are “name value pairs”, meaning a version of the cookie is stored on our web server and also saved on your computer device.

- **Data:** your computer device; information identifying you via the computer device you use to access our website.
- **Legal basis:** we only use optional cookies when we have your consent. Optional cookies require you to proactively “opt-in” to accept storage of these cookies. The Co-op uses a paid service to manage the process of ensuring all website visitors are challenged with a consent bar until such time as they provide consent. Optional cookies are disabled until consent is provided. The consent bar provides an option to view cookie details and selectively opt-in or opt-out of specific cookies. Additionally, a monthly scan of the cookies used by the website is automatically carried out and details of the cookies are added to the consent form.
- **How we store this data:** Cookie data is “name value pairs” - two versions of the cookies are generated by our web server. One copy is sent to your computer and stored there, the other copy is kept on the server. Cookies have expiration durations set, defining when the cookie expires and is deleted. The maximum auto-expiration duration we use for cookies is two years.

You sign up to our newsletter.

- **How collected:** You self enrol in our mailing list, via an online form embedded in our website.
- **Data:** Your personal information including information identifying you or your computer, information about how to contact you including your email address, your location, your preference (such as mailing list preferences).
- **Legal basis:** We use your consent as the legal basis for this activity. When you sign up for the newsletter, you provide your consent explicitly by checking a tick box for consent. When we send you newsletter emails, we include an unsubscribe form to enable you to remove your consent at any time.
- **How we store this data:** Your personal information is stored in a class-leading email and newsletter solution. Only authorised persons have access to your data and two-factor authentication is required for all our accounts. If you remove your consent, we delete your personal data immediately, otherwise we will delete your data two years after it is no longer used.

Ticketing for events.

- **How collected:** When we run events, be they online or in-person, we use a web-based ticketing system to collect your information, including your name and email address, plus information about your preferences related to events (such as dietary requirements or access requirements).

- **Data:** Your name and email address will be collected in all circumstances. We may also collect information about your preferences. The systems we use will also collect identifying information about your computer or your location.
- **Legal basis:** We use legitimate interest as our legal basis. It would not be possible for us to provide tickets to events without collecting this information. Most people would reasonably expect that to provide tickets for events some amount of their personal information must be collected and processed. This collection of your information has a minimal privacy impact.
- **How we store this data:** Your information will be stored in a class-leading ticketing solution and where we run online events your information may also be stored in a class-leading online meeting solution. We delete your information within three months of the event having taken place.

You make a purchase via our website.

- **How collected:** When you make a payment via our website, we use a third-party payment gateway to collect your personal information.
- **Data:** The data we collect about you includes identifying data, such as your name and a unique identifier, information about your computer device, including your IP address and mac address and your browser footprint, your contact details, including your email address, address, phone number and location (country), your credit card or debit card details, and data relating to your purchases.
- **Legal basis:** We have a legitimate interest. Most people would reasonably expect an online payment process to necessarily collect your personal data. The collection of your data has a minimal privacy impact. We would be unable to offer online payments to you without collecting your personal data.
- **How we store this data:** This personal data is collected by a class-leading payment gateway service. Some of your data may then be transferred to other services, such as our membership services (see below). We are obliged to keep information related to your purchase for seven years.

You become a member of Loco Home Retrofit CIC.

- **How collected:** Your personal information is provided by you when you complete the membership form on our website.
- **Data:** Your identifying data, such as your name and a unique identifier, your contact details, including your email address, phone number and home address. We also receive information related to the payment you make with our payment processor.
- **Legal basis:** Our legal basis for collecting your personal information in this situation is that we have a legal obligation to collect this information. This obligations arises from Section 113 of the Companies Act 2006 that we maintain a register of members.
- **How we store this data:** Your personal information is stored in a class-leading website and membership management solution. Only authorised persons have access to your data and two-factor authentication is required for all authorised persons. We are

required to keep information related to members, including your personal data when you become a member, for a period of 10 years after the date you cease to be a member.

WHAT WE DO WITH THE INFORMATION WE HAVE

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out earlier in this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- Sending transactional emails to you related to your membership of Loco Home Retrofit CIC.

WHEN WE SHARE YOUR DATA

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the UK where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

- **Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please **contact us** if you wish to make a request.

HOW TO COMPLAIN

Contact us using the information provided in the OUR CONTACT DETAILS section above.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113