



## **DATA PRIVACY NOTICE**

### **Qube, Oswestry Community Action**

#### **Your personal data – what is it?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation.

#### **Who are we?**

Qube is the data controller (contact details below). This means we decide how your personal data is processed and for what purposes.

#### **How do we process your personal data?**

Qube complies with its obligations under GDPR:

- By keeping personal data up to date;
- By storing and destroying it securely;
- By not collecting or retaining excessive amounts of data;
- By protecting personal data from loss, misuse, unauthorised access and disclosure
- By ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To administer membership records;
- To keep you up to date with Qube news, courses, arts projects and exhibitions, volunteering opportunities and events;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To refer you to third party organisations where relevant e.g. through our Volunteer Centre service (with your full permission);
- To operate the Qube website and deliver the services that individuals have requested;
- To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered.

## What are the legal bases for processing your personal data?

There are six legal bases for processing your personal data. The variety of services provided by Qube mean that we may use more than one of these bases depending on the service area you use. If you use a range of services then a range of the bases below will apply to your data. In the definitions below, you are the data subject and Qube is the data controller/processor.

- **Consent** of the data subject (e.g. Course attendees, Mailing list subscribers, Competition entrants, Arts projects participants or Volunteers using our Volunteer Centre)
- Processing is necessary for the performance of a **contract** with the data subject or to take steps to enter into a contract (e.g. Dial-A-Ride Membership, Shopmobility Scheme Membership, Freelance work as a Qube Tutor, Art Exhibitor or Cabinet stock provider, Qube Subcontractors)
- Processing is necessary for compliance with a **legal obligation** (e.g. staffing and trustees, Qube volunteers)
- Processing is necessary to protect the **vital interests** of a data subject or another person (e.g. Tuesday club members, Shopping Scheme Members, Dial-A-Ride Members or Shopmobility Scheme members)
- Processing is necessary for the performance of a **task** carried out in the **public interest** or in the exercise of official authority vested in the data controller.
- Processing is necessary for the **legitimate interests** of the data controller or a third party, unless there is good reason to protect the individual's personal data which overrides those legitimate interests. (E.g. Volunteer Centre users, Tuesday Club members or participants of special funded projects.)

## Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with Qube staff and volunteers for appropriate purposes. We will only share your data with third parties e.g. referrals for volunteering opportunities or social prescribing referrals with your consent.

## How long do we keep your personal data?

We will keep your personal data for up to 3 years at which point we will contact you again to re-seek permission. Personal data pertaining to specific funded projects may need to be held for significantly longer periods of time (subject to the individual funder) but your data will be anonymised. Personal data is kept in order to keep you informed about Qube services, to update membership records and for safeguarding purposes.

## Your rights and your personal data

Unless subject to an exemption under GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Qube holds about you;
- The right to request that Qube correct any personal data if it is found to be inaccurate or out of date;
- The right to request that your personal data is erased where it is no longer necessary for Qube to retain such data;
- The right to withdraw your consent to the processing at any time;

- The right to request that Qube provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (e.g. for Volunteer Centre referrals or Social Prescribing referrals)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, where applicable (Only applies where processing is based on legitimate interests)
- The right to lodge a complaint with the Information Commissioners Office.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the Chief Officer of Qube, Oswestry Community Action, Oswald Road, Oswestry, Shropshire, SY11 1RB.  
Tel: 01691 656882, [info@qube-oca.org.uk](mailto:info@qube-oca.org.uk)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Written May 2018.