

Privacy Policy

WorkingRite is committed to ensuring that your privacy is protected, as a user of our services, project employer, partner, supporter, prospective employee, volunteer, commercial or professional contact. Under data protection laws we have a duty to protect any personal information you provide us. We will ensure that such information is only used for the purpose for which it was requested/provided and that it is stored securely.

Overview

This privacy policy relates to personal data we collect through various means and governs the privacy of users who choose to engage with us.

GDPR (2018)

WorkingRite and this website comply with the GDPR (2018), the Privacy & Electronic Communications Regulations (PECR) – and formerly with the DPA (1998).

Collecting personal information

WorkingRite collects personal information from you when you:

- Give information to us directly through social media engagement, making a donation, applying for a position, registering for an event or providing us with personal information in another way.
- <u>Enrol on our programme</u> when you enrol directly, or are referred to one of our programmes.
- <u>Use the website</u> we collect information about how people use our website and the pages they visit.

We treat personal information confidentially and will take all reasonable steps to ensure your personal information is secure once it has been transferred to our systems.

Our Data Protection procedure ensures we have appropriate data collection, storage and processing practices and security measures in place to protect against unauthorised access, alteration, disclosure or destruction of your personal information.

Whilst we take these security measures, for personal data disclosed online we are unable to guarantee security and users must accept the inherent security risks of providing such information online and not hold us responsible for any loss or damage you may incur.

Steps are taken to ensure your personal information is not transferred outside the European Economic Area (EEA), and we work with suppliers to ensure they do not transfer any data which they look after for us. Where this is unavoidable, we ensure that any personal data transferred outwith the EEA is properly treated and specifically relating to US based suppliers (such as MailChimp), these are certified under the EU-US Privacy Shield scheme.

We will generally only keep your information for as long as necessary for the purpose for which it is collected, or where we have a legal obligation to keep information for a certain period of time.

Specific aspects of the Privacy Policy are noted below.

Website

The policy notes the areas of our website – workingrite.co.uk - that may affect your privacy and personal details – including how we process, collect, manage and store those details and how your rights are adhered to under the GDPR. It also explains the use of software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) through this website. Any specific explanations relevant to particular pages or features of the website are explained to ensure you understand how we, the website and any third parties interact with you and your device.

When a user visits the website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We use this service to monitor things such as the number of visitors to various parts of the site.

This information is processed in a way that does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.

Users contacting us via this website do so at their own discretion and provide any personal details requested at their own risk. Your personal information is kept private and stored securely until such time as it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express consent, we may use your details to send you products/services information through a third party mailing list system. This is done in accordance with the regulations named in the policy.

Downloads / Media Files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. All precautions have been taken to ensure only genuine downloads are available, users are advised to verify their authenticity through third party anti-virus software or similar applications. We accept no responsibility for third party downloads or downloads provided by external third party websites.

External website links / Third parties / Adverts

Our website may include links to other websites, not owned, associated or managed by WorkingRite.

Whilst we try to ensure we only link to reputable websites, we cannot be held responsible for the privacy of information collected by sites not managed by us, nor can we accept responsibility or liability for them. Users are advised to adopt a policy of caution before clicking any external links mentioned throughout this website and we would advise that user consult the privacy policy on any external website you link to before you submit any personal information to those websites.

Adverts / Sponsored Links - at present this website does not have advertisers or sponsored links. The policy will be updated as such time if this was to change.

Marketing

We may contact you for marketing purposes by email if you have agreed to be contacted in this manner. If you have provided us with your postal address or telephone number we may send you direct mail or telephone you about relevant / agreed aspects of our work, if you have given explicit consent for us to do so in this manner.

We operate an email mailing list system (MailChimp), to inform subscribers about services, updates and news about the organisation. MailChimp is certified under the EU-US Privacy Shield scheme.

Users can subscribe through an automated process where they have given explicit consent. Subscriber personal details are collected, processed, managed and stored in accordance with the regulations named in the policy. Subscribers can unsubscribe at any time through an automated online service or as detailed in the footer of sent enewsletter messages. The type and content of enewsletter messages is outlined at the point of subscription.

Email messages may contain tracking processes in order to track subscriber activity within email marketing messages. Where used, such messages may record a range of subscriber data relating to engagement, geographic demographics and already stored subscriber data.

We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we may retain your details in accordance with legal requirements and to help ensure that we do not continue to contact you in the future.

Social media

We have organisational social media platforms and some staff may have official business profiles on these platforms. Users are advised to verify authenticity of such profiles before engaging with, or sharing information, with these profiles. We will never ask for personal details on such media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. Users use such sharing buttons at their own discretion and accept that doing so may publish content to your own social media profile feed or page.

If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws, such as defamatory content on our social media pages, we may use your personal information to inform relevant third parties such as your internet provider or law enforcement agencies.

Surveys

We may occasionally contact you to request that you complete an online survey to seek feedback about your experiences with us. We will only collect personal information in the context of online services where this is necessary for us to receive adequate feedback from you. All these surveys are optional – you do not need to complete a survey if you do not wish to do so.

Archiving

Data protection laws give you a number of rights as set out below. If you would like to exercise any of your rights, please contact us using the details located above.

- Access your personal information: you may request access to a copy of your personal
 information. All requests for access to personal information should be made to us in
 writing.
- Withdraw consent: if you have given us consent to use your personal information to send you communications, you can withdraw your consent at any time.

- **Rectification:** you may ask us to rectify and update any inaccurate information we hold about you or to complete any information that is incomplete.
- **Erasure:** you may ask us to delete your personal information.
- **Portability:** you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or ask for us to send such personal information to another data controller.
- **Restriction:** you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **Object:** you may object to our processing of your personal information in accordance with this Notice. Please contact us, providing details of your objection.

You may make a complaint about our data processing activities by contacting us on 0131 553 9395 or info@workingrite.co.uk. Alternatively, you may make a complaint to the UK supervisory authority, which is the Information Commissioner's Office, by visiting their website at www.ico.org.uk/concerns, by phoning 0303 123 1113 (local rate) / 01625 545 745 (national rate), or by writing to the:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

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