

Privacy Policy

We take the collection and processing of personal data seriously and have updated our policies, systems and processes to comply with GDPR. The Privacy Notice below explains in full how we treat personal and sensitive data in our organisation.

Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and how we will keep it safe.

There is a lot of detail here, but it is important that you are fully informed of your rights, and how Real Ideas uses the data you share with us.

We've broken down the information into sections to make it easier to find the detail you're looking for and we hope it will answer any questions you have but if not, please do get in touch with us.

We will need to update this Privacy Notice from time to time, the most current version will be on our website, you are welcome to come back and check it whenever you wish. When you are using our websites, RIO is the data controller.

In most circumstances RIO is the Data Controller and Data Processor. There are certain circumstances though when RIO will act as a joint Data Controller, or as Data Processor for a different Data Controller, for example with a funder when delivering a programme of support to beneficiaries. When this is the case we will make it clear to you who is the Data Controller and Data Processor when we ask for your data.

What is the Real Ideas Organisation?

The Real Ideas Organisation – which we will refer to here as 'RIO' – is made up of several related businesses:

Real Ideas Organisation CIC, Real Ideas Trading Ltd, Real Ideas Assets CIC as well as RIO's customer facing brands including Devonport Guildhall, Ocean Studios, Column Bakehouse, The Market Hall, 1000 Makers, Plymouth Robotic Sailing Championships, The Social Enterprise Qualification (SEQ), Plymouth SOUP, Liskeard SOUP and Game Changer.

For simplicity throughout this notice, 'we' and 'us' means RIO, it's companies and brands.

Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, we only need to identify one of these bases which include:

Consent

In specific situations, we can collect and process your data with your consent. For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Public Interest

When delivering work on behalf of public bodies such as the Department of Work and Pensions, the European Union, or the Big Lottery Fund, we may collect data to perform a specific task in the public interest set out in law.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, when providing support to you via a publicly funded programme, we'll collect details including your location, age and employment status and share them with our funder.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting RIO to law enforcement. We may also rely on this basis for processing your data where we need to comply with our obligations in relation to safeguarding concerns or child protection issues.

Legitimate interest

In specific situations, we require your data to pursue our our your legitimate interests in a way which might reasonably be expected as part of running our business or acting in your best interests (eg safeguarding or child protection issues) and which does not materially impact your rights, freedom or interests. For example, we may use your purchase history with us to send you details of special, personalised offers.

We may also combine the demographics of many of our customers, service users and beneficiaries to identify trends and ensure we can keep up with demand or develop new products/services.

We may also use your home or business address details to send you direct marketing information by post, mailing you about products and services that we think might interest you. Where we rely on legitimate interests as the lawful basis for processing your data we will first complete a Legitimate Interests Assessment.

When do we collect your personal data?

- When you visit any of our websites
- When you become a member
- When you sign up to any of our programmes
- When you volunteer with us
- When you apply for a job with us or speculatively send us your CV



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- If you join our team as a Non-Executive Director or member of staff
- When you purchase a product or service
- When you engage with us on social media
- When you contact us by any means with queries, complaints etc
- When you enter prize draws or competitions
- When you book any kind of appointment with us or book to attend an event, for example a baking class at Column Bakehouse or workshop at Ocean Studios
- When you choose to complete any surveys we send you
- When you fill in any forms. For example, if an accident happens in one of our buildings, we may collect your personal data
- When you've given a third party permission to share with us the information they hold about you
- When you use our buildings which have CCTV systems operated for the security of both customers, clients, staff and tenants. When in operation these systems may record your image during your visit

What sort of personal data do we collect?

If you sign up to one of our programmes: your name, gender, date of birth, address, employment status, email and telephone number. Depending on the nature of the programme we may also need to request copies of your birth certificate or passport and your National Insurance number. We also keep details of support provided by our staff in their interactions with you which may include notes from conversations and copies of emails as well as how and when we contact you, and how and when you contact us. These records may form the basis of "Safeguarding Reports (Cause for Concern)" if we need to complete these to comply with our legal obligation to safeguard you or to act in accordance with relevant child protection procedures.

If you become a member, across all levels: Your name, email address, postal address and postcode. Other data includes business address, business name where applicable. If we identify that we could provide additional support as part of our coaching / business support / mentoring via an eligibility search - this would be in extension to the membership benefits we will notify you and in this instance may request some more detailed information as specified by our funders. Across our campus of buildings we will use minimum credentials to onboard you to our door access systems - more details of this and our ability to revoke access can be found in the membership Terms and Conditions. On cancellation of a paid-for membership you will automatically be downgraded to our Free membership level 'Join Us' however you still have the right to be forgotten as part of our general privacy GDPR policy.

Job applications and speculative CVs are processed in accordance with RIO's safer recruitment procedures and Resourcing Policy. This includes processing personal contact details, employment and education history, skills and referees. Special category data is also collected using RIO's Equality Opportunities form and includes information provided regarding any relevant spent convictions in accordance with the Rehabilitation of Offenders Act 1974.

Information provided is processed in the strictest confidence and will only be considered in relation to the job applied for.

If you enquire about, or book to use one of our venues or participate in one of our courses or workshops: your name, address, gender, email and telephone number.

Details of any complaints you raise in person, online or by telephone.

Copies of documents you provide to prove your age or identity where the law or programme funder requires this (including your passport and driver's license and National Insurance number). This could include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.

Details of your visits to our websites or apps, and which site you came from to ours.

Information gathered by cookies in your web browser.

Payment card information.

Your image may be recorded on CCTV when you visit a venue run by us.

To deliver the best possible web experience, we collect technical information about your internet connection, device type and browser as well as the country and area where your computer is located, the web pages viewed during your visit on our site and any search terms you entered.

Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to send you information on the programmes we run which may be of interest to you and also offer you promotions, products and services.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked or applied for.

For example, if you've asked us to let you know when we are next running Bread Making courses at Column Bakehouse, we can't do that if you've withdrawn the right consent to hear from us.

How we'll use your personal data and why:

To process requests for support through one of our programmes. If we don't collect your personal data we can't prove you are eligible for free funded support and comply with our contractual obligations with the programme.

We process CVs and job applications in accordance with RIO's safer recruitment procedures and Resourcing Policy.

To respond to your queries, requests and complaints. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations

and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

To protect our customers, premises, assets and Partners from crime, we operate CCTV systems in some of our buildings which record images for security. We do this on the basis of our legitimate business interests.

To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.

If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.

With your consent, we will use your personal data, preferences and details of your transactions with us to keep you informed by email, web, text and telephone about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. You are free to opt out of hearing from us by any of these channels at any time.

To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest. You are free to opt out of hearing from us by post at any time.

To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice or legally required information relating to the services we provide you. These communications will never contain marketing information.

To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.

To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

To comply with our contractual or legal obligations to share data with law enforcement or other statutory or relevant authorities. For example, when a court order is submitted to share data with law enforcement agencies or a court of law, or where we are required to hold or share data to comply with our safeguarding obligations and child protection procedures, including in relation to the preparation and sharing of Safeguarding Reports (Cause for Concern).

To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Combining your data for personalised direct marketing

We want to share offers and information with you that is most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we might combine your personal data gathered across RIO as described above, for example your relationship and purchase history at RIO, Devonport Guildhall, Ocean Studios and Column Bakehouse, as well as the campaigns you engage in and which events of ours you attend.

How we protect your personal data

We know how much data security matters to all our clients, customers, staff and beneficiaries. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected, we regularly monitor our system for possible vulnerabilities and attacks, and we carry out appropriate testing to identify ways to further strengthen security.

How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

Support via RIO programmes

When you receive support from us from a funded programme we will keep the personal data you give us in accordance with the rules of the funder, for EU funded programmes this could be up to 10 years so we can comply with Public Interest and our legal and contractual obligations.

Recruitment

Speculative CVs will be kept on file for 6 months

Unsuccessful applicant details will be kept on file for 6 months, in accordance with statutory regulations, unless applicants specifically request that this should not be the case.

Bookings at our venues

When you book to hire one of our venues or participate in an event or workshop with us, we will hold your data for up to 5 years from the date of the transaction. We do this on the basis of our legitimate business interests.

Buying products or services from us

When you pay us for a product or service – whether that is a loaf of bread from our bakery, the cost of hiring a room at one of our venues, or a fee to deliver a piece of consultancy work – we will keep records of our financial transaction with you for 7 years. We do this on the basis of our legal and contractual obligations.

Who do we share your personal data with?

We sometimes share your personal data with trusted third parties. For example, copywriters who may contact you to write an article about your development journey, or a partner organisation we think could help and support you.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

We provide only the information they need to perform their specific services.

They may only use your data for the exact purposes we specify in our contract with them.

We work closely with them to ensure that your privacy is respected and protected at all times.

If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

Direct marketing companies who help us manage our electronic communications with you. Google/Facebook to show you information that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.

Copywriters and journalists who create case studies and marketing content for us.

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in the UK, your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We may share your personal data with relevant authorities where we are under a legal duty to do so, or where we feel that it is in your legitimate interests that we do so, for example in relation to safeguarding or child protection issues. Where we rely on your legitimate interests as the lawful basis for sharing your data we will first undertake a Legitimate Interests Assessment.

For further information please contact our Data Controller

To help personalise your journey through our websites we sometimes may use the following companies:

- Google
- Twitter
- Instagram
- YouTube
- Yahoo
- Pinterest
- Facebook

Where do we process your data?

RIO will only process your data inside the European Economic Area (EEA) which includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

What are your rights over your personal data?

The GDPR provides the following rights individuals:

Right to be informed

Individuals have the right to be informed about the collection and use of their personal data

Right of access

Individuals have the right to access their personal data and supplementary information (known as a Subject Access Request) *.

Right to rectification

GDPR includes rights for individuals to have inaccurate personal data rectified or completed if it is incomplete.

Right to erasure/forgotten

GDPR introduces a right for individuals to have personal data erased in certain circumstances.

Restrict processing

Individuals have the right to request the restriction or suppression of their personal data

Data portability – right to transfer data between controllers

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

Right to object

Individuals have the right to object to processing based on legitimate interests or the performance of a task in the public interest, direct marketing and processing for purposes of scientific/historical research and statistics.

Right not to be subjected to automated decision making

GDPR has provisions on automated individual decision making and profiling

*To ask for your information, please contact Data Controller, Real Ideas Organisation, Devonport Guildhall, Ker Street, Plymouth, PL1 4EL or email datacontroller@realideas.org
If we choose not to action your request we will explain to you the reasons for our refusal, based on the lawful bases for processing outlined in Section 3 above.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing



You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. To stop hearing from RIO please write to Real Ideas Organisation, Devonport Guildhall, Ker Street, Plymouth PL1 4EL. We will always comply with your request.

Email marketing

You have the right to stop the use of your personal data for email marketing. All our email marketing activity is delivered via Mailchimp which will always give you opportunity to update your preferences or withdraw your consent to hear from us with marketing messages. We will always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us at datacontroller@realideas.org

Or write to us at Real Ideas Organisation, Devonport Guildhall, Ker Street, Plymouth PL1 4EL.

This notice was last updated on 22/05/2018