



STREETBIKES CLIENT PRIVACY NOTICE

Privacy notice

Streetbikes is aware of its obligations under the General Data Protection Regulation (GDPR) and domestic data protection legislation, and is committed to processing your data securely and transparently. This privacy notice sets out, in line with current data protection obligations, the types of data that we hold on you as an employee of the Charity. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to current and former clients.

Data controller details

Streetbikes is a data controller, meaning that it determines the processes to be used when using your personal data.

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your engagement with Streetbikes, in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have not consented to (as appropriate)

Types of data we process

We hold many types of data about you, which may include

- your name, first & surname
- post code
- age bracket which applies to you
- email address
- phone numbers
- address
- gender
- disability category (if applicable)
- information used for equal opportunities monitoring about your ethnic origin
- dates attended Streetbikes sessions
- your decision on Streetbikes right to use photographs in which you appear for promotional purposes.
- your decision on wearing a cycle helmet at the track
- your decision on Streetbikes right to use your data anonymously, such as gender, ethnicity, age bracket, disability or vulnerability category, for promotional purposes

How we collect your data

We collect data about you in a variety of ways and this will usually start when you arrive at check in at the Streetbikes Cycle Track, where we will collect the data from you directly. This includes the information outlined above. In some cases, we will collect data about you from third parties, such as your carer, or former carer.

Personal data is kept in personnel files or within the organisation's IT systems.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the engagement contract that we are party to when you partake in Streetbikes activities
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest
- where we have obtained your consent.

All of the processing carried out by us falls into one of the permitted reasons. For example, we need to collect your personal data in order to:

- carry out the engagement contract that we have entered into with you when you partake in Streetbikes activities

We also need to collect your data to ensure we are complying with legal requirements such as:

- making reasonable adjustments for children, disabled and vulnerable individuals.

We also collect data so that we can carry out activities which are in the legitimate interests of Streetbikes. We have set these out below:

- maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- assessing training needs
- gaining expert medical opinion when making decisions about your fitness to take part in Streetbikes cycle activities
- dealing with legal claims made against us
- ensuring our administrative and IT systems are secure and robust against unauthorised access

Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership

- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction data

- *Not applicable – no such data collected for clients*

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your engagement contract with us. If you do not provide us with the data needed to do this, we will be unable to perform those duties e.g. permit you to use the Streetbike facilities. We may also be prevented from confirming, or continuing with, your engagement with us in relation to our legal obligations if you do not provide us with this information.

Sharing your data

Your data will be shared with colleagues within Streetbikes where it is necessary for them to undertake their duties. This includes, for example, Streetbikes employees, volunteers, administration & contractors working on behalf of Streetbikes.

We may also share your data with third parties as part of a restructure, or for other reasons to comply with a legal obligation upon us.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with current data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, which will be at least for the duration of your engagement with us though in some cases we will keep your data for a period after your engagement has ended. Retention periods can vary depending on why we need your data. We follow ICO guidance in this regard.

Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Data Protection Policy.
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data.
- You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact the Streetbikes Operations Manager.

Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.