



Privacy and Data Protection Policy

Trans Pride Hastings takes your privacy seriously and are committed to protecting your personal information and working with honesty, transparency and integrity. This policy sets out how the company uses the information that you provide us to help further our work in delivering events for the trans, non-binary and gender expansive communities of Hastings, St Leonards & Bexhill.

Please read this Privacy Policy carefully. If you do not agree with this Privacy Policy, you should stop using our website and our other services immediately.

Your Data

Trans Pride Hastings will not sell your data to any third parties.

Trans Pride Hastings

Trans Pride Hastings is a Data Controller, as identified through GDPR legislation. By Trans Pride Hastings, we mean Trans Pride Hastings CIC (14740741).

The Data Protection Supervisor for Trans Pride Hastings is Zed Gregory and they can be contacted by emailing transpridehastings@gmail.com

Data- what do we collect?

Trans Pride Hastings collect individual's data in a number of different ways, for a number of different purposes- for example we will:

- 1) Ask for contact details when we are booking audiences or participants into events, workshops or training. This will be a name, phone number, email address and occasionally an address- if we are working with older audiences that do not use email.
- 2) Ask for monitoring information from audiences, participants and volunteers, which typically includes information about postcode, date of birth, sexuality, gender or ethnicity.
- 3) Ask audiences, participants, interns and volunteers to complete evaluation to support the development of our events, workshops and training. This would typically include feedback about the activity.
- 4) Ask individuals, groups or organisations who are financial supporters to give us information that allows us to administrate donations. This would typically include information such as a name, contact details, address, email, telephone number and payment details.
- 5) Ask for contact details from audiences, participants and community members to keep them informed about our events, programmes and opportunities or fundraising initiatives. This would typically be an email address.
- 6) Ask for consent to collect cookies from the website to allow Trans Pride Hastings to use google analytics

Why do we collect this data?

Trans Pride Hastings collect this data for a number of specific reasons, which are as follows:

- 1) We ask for contact details so that we can contact you if an event is cancelled or changes in some way.
- 2) We ask for monitoring information in order to ensure that we are reaching the target groups for our projects and services.

- 3) We ask for evaluation and feedback on what we do, so that we can improve our work and make a case for funding.
- 4) We ask for financial information if you have asked to make a donation to us so that we can carry out our charitable aims.
- 5) We ask for your contact details so that we can occasionally contact you via email with news about our projects and services or with suggestions of ways in which you could become involved with our work.
- 6) We analyse information from audiences, participants and community members to ensure that all of Trans Pride Hastings communications are tailor-made to their needs, interests and requests.
- 7) We use google analytics to help us understand who is engaging with our website and in what way, in order to improve its functionality.

Privacy and the Law

The Law on Data Protection is derived from various pieces of legislation including the Data Protection Act and the incoming General Data Protection Regulation or GDPR, to which all organisations based in the UK will need to be compliant by May 2018. The GDPR states that personal data can only be 'processed' (i.e. collected, stored and analysed) if there is a legal ground to do so. The GDPR provides six legal grounds under which personal information can be legally processed. Five out of the six grounds for processing that are most relevant to Trans Pride Hastings use of your data are:

- 1) Consent:** where you have given us clear consent for us to process your personal data for a specific purpose – i.e. to sign up to join one of our events.
- 2) Contract:** where processing your data is necessary for us to complete a contract that we have entered with you – i.e. to send you tickets that you have ordered for an event.
- 3) Legal Obligation:** where processing your data is necessary for us to comply with the law – i.e. to complete a DBS check in order to employ you to work with vulnerable people.
- 4) Vital interests:** where processing your data might be necessary to protect your safety or your life – i.e. to follow Trans Pride Hastings safeguarding policy by alerting the relevant authority to follow up a serious safeguarding concern.
- 5) Legitimate interests:** where processing your data is necessary for our legitimate interests- i.e. to analyse monitoring information of specific audiences to stimulate outreach work with under-represented groups.

Trans Pride Hastings will always ensure we have specific consent to hold your data, we will be clear about why we are processing or analyzing it and we will treat the information you give us with respect. The company will never rent, swap or sell your personal information to other organisations for them to use in their own marketing activities and we will always be able to give you a clear and straight forward answer about what data we hold, how we store it, what we will use it for and what the legal grounds for doing so are.

Consent

You will be able to withdraw your consent to Trans Pride Hastings holding your data at any time by emailing Trans Pride Hastings Data Protection Supervisor on transpridehastings@gmail.com

What is Legitimate Interest

This legal ground for processing means that organisations can process your personal information if they 1) Have a genuine and legitimate reason for doing so and 2) That use does not harm any of your rights and interests as an individual.

Trans Pride Hastings Legitimate Interest

We believe that Trans Pride Hastings' community understand and support what we are trying to achieve and want to hear about our work. Unless you tell us not to, we think you are happy for us to process your personal information so we can let you know what we are up to and how to get involved. Trans Pride Hastings serve different population groups which share an identity, situation or interest.

Financial Supporters

Trans Pride Hastings does sometimes need to fundraise for events, to do this we may need to occasionally contact audience groups about ways in which they can support the company's work. Trans Pride Hastings believe that the audience groups held on the company's CRM system which have already opted in to receiving communications about the company's work will be interested in hearing about these campaigns.

How long will we hold your data for?

If you have opted in to receive information about Trans Pride Hastings work through the website, we will ask for your consent to hold your data for 7 years. This is to comply with health and safety records which we are required by law to keep for this time period.

Changing Your Mind

Engaging with Trans Pride Hastings is always your choice. If you don't think we have got the level of communication quite right for you, you can tell us to change your preferences or ask us to remove you from our database permanently by emailing transpridehastings@gmail.com and we will act on your wishes immediately.

Data Controller

Trans Pride Hastings are Data Controllers. The Data Controllers hold the responsibility to provide written advice and guidance to the staff members who Coordinate our events to ensure that they are using systems that will protect your data and your privacy, and that this can be evidenced if any of the companies are investigated or audited.

Cookies and Web Privacy

Trans Pride Hastings guarantees that we will respect and protect your online privacy. This includes your need and your right to know what we do with the personal information you share with us. It also guides our companies' policies regarding the management of this data, including how the information is collected, processed, and for what purposes. By accessing the website Trans Pride Hastings you are consenting to the way information is collected and used, as described within this Privacy Policy. In return, we give the commitment that we will use the personal data you provide only in ways that are compatible with the following Privacy Policy.

The Collection of information

Every time you log on to our website your IP (Internet Protocol) address registers on our servers. Your IP address reveals no information other than the number assigned to you. We will not use this technology to get any personal data against your knowledge or free will (i.e. automatically recording e-mail addresses of visitors). Nor do we use it for any purpose other than to help us monitor traffic on our website, or (in case of criminal activity or misuse of our information) to cooperate with law enforcement.

Cookies

We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <http://www.aboutcookies.org> for detailed guidance.

First Party Cookies

These are cookies that are set by the websites concerned directly.

Google Analytics

Trans Pride Hastings uses Google Analytics to collect information about visitor patterns. Google Analytics stores information about what pages are visited, how long each visitor spends on the site, how they got here and which pages are visited. This Analytics data is not tied to personally identifiable information - your personal information such as your name and address is not stored and therefore cannot be used to identify who you are. You can find out more about [Google's position on privacy](#) as regards its analytics service.

Third Party Cookies

These are cookies set by external websites whose services are used the Trans Pride Hastings website. Cookies of this type are the sharing buttons across the site, which allow visitors to share content from the Trans Pride Hastings website onto social networks such as Facebook or Instagram.

Third Party Cookies are currently set by Twitter, Facebook, Google+, Instagram and Pinterest if you share content from Trans Pride Hastings website to these platforms. In order to implement these buttons, and connect them to the relevant social networks, Trans Pride Hastings uses scripts from domains outside of our website. You should be aware that these sites are likely to be collecting information about what you are doing all on the internet, including when you access the Trans Pride Hastings website. If you are concerned about your privacy, you should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

Emails

The majority of the emails that Trans Pride Hastings sends are not tracked at all. However occasionally, we will send out an email with news about what is coming up and these will track whether the user has opened and clicked on the email. We do not use this information at a personal level, rather we use it to understand 'open and click' rates on our emails to try and improve them. If you want to be sure that none of your email activity is tracked, then you should opt out of our emails which you can do via the unsubscribe link at the bottom of every email that is sent.

Web Security

All donations to Trans Pride Hastings are made via Donorbox and are secure. No one can access your credit card details via the internet.

Protocol in the Event of a Data Breach

In the event of a significant data breach, Trans Pride Hastings will notify the ICO within 72 hours, notify any individuals affected and contact the board of directors. A 'significant breach' would be an incident where individuals' data was released into the public domain and there was a serious risk to their privacy.

Documentation – the use of photographs, audio and video data

All digital photographs, audio and video files will be held in our archive, which we believe is of 'Legitimate Interest' to the LGBTQIA+ community.

We will seek consent to collect and hold digital photographs, audio and video files. This consent will be specific, time based and the data will only be collected and processed when the company has a 'Legitimate Interest' for doing so.

Right to be Forgotten

Finally, Trans Pride Hastings will be happy to provide you with all the data that we hold on you and to delete it from our records if requested. If you wish to see or delete the data that we hold on you, we will need to see an original piece of primary identification such as a passport or driving license before we will be able to release the information. Once you have made a request we will respond within 30 days as required by the GDPR legislation. If you have a request please, contact us on transpridehastings@gmail.com

Policy Review

This policy and procedure will be reviewed periodically giving due consideration to any legislative changes.

Director's Signature:



Adopted on:

19 July 2023