

# **PRIVACY NOTICE**

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This notice was last updated on Thursday September 16<sup>th</sup>, 2021 and complies to the UK GDPR, underpinned by the UK law the Data Protection Act (2018), and regulated by the UK ICO (Information Commissioners Office).

## **Scope & Responsibilities**

Our scope is all data subjects, whose personal data is collected, in line with the requirements of the UK GDPR.

The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to Gloucestershire Climate Commitment collecting/processing their personal data.

All associates/employees of Gloucestershire Climate Commitment who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their personal data is secured.

## **Who we are?**

Gloucestershire Climate Commitment is a non-for-profit voluntary organisation which aims to make it easier for Gloucestershire based businesses to make the UK commitment to reduce greenhouse gas emissions to zero by 2050, by providing a platform for the commitment and the tools to help them follow through.

Gloucestershire Climate Commitment collects and processes certain personal information about you.

When we do so we are regulated under the [UK General Data Protection Regulation](#), which is underpinned by the [Data Protection Act \(2018\)](#)

We are responsible as the 'data controller' & 'data processor' for all personal information collected for the purposes of those laws. The Data Protection Officer (DPO) is Eoin McQuone of Sustainable Business Design, 21 Naunton Lane, Cheltenham, Gloucestershire, England, GL53 7BJ.

Gloucestershire Climate Commitment can be contacted via email [enquiries@sustainablebd.com](mailto:enquiries@sustainablebd.com) or by phone on 0333 344 5890.

## **The personal information we collect and use.**

### **Lawful bases for processing of personal data:**

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever Gloucestershire Climate Commitment processes your personal data:

- **Consent** - the individual has given clear consent for Gloucestershire Climate Commitment to process their personal data for a specific purpose. The individual has the right to object and the right to withdraw consent.
- **Legitimate Interests** - the processing is necessary, as Gloucestershire Climate Commitment has ascertained the legitimate interest of the individual/organisation and explained why the processing of personal data is required to action the legitimate interest. Gloucestershire Climate Commitment reviews our legitimate interest to hold personal data annually via a Legitimate Interests Assessment (LIA).

You can find more about the UK GDPR lawful bases [here](#) or by visiting [www.ico.org.uk](http://www.ico.org.uk)

## **How we use your personal information**

Gloucestershire Climate Commitment uses your personal information:

- To set-up our partners on the Gloucestershire Climate Commitment platform (e.g., contact details, payment information)
- To provide and maintain our services (e.g., emails, calls)
- To notify you about changes to our services (e.g., direct communications through secure & trusted Gloucestershire Climate Commitment communication channels)
- To allow you to participate in any interactive features of our services when you choose to do so (e.g., video calls, feedback surveys)
- To monitor the analysis/usage of the services (e.g., non-personal data via Google Analytics in relation to the Gloucestershire Climate Commitment website)

## **Information collected by us.**

While providing our services Gloucestershire Climate Commitment collects the following personal information when you provide it to us:

- ☐ Names and, contact details (e.g., contact names, email addresses, contact numbers)

## **Who we share your personal information with?**

Gloucestershire Climate Commitment may exchange personal data, as highlighted in the 'information collected by us' section of this privacy notice, with our associates and charity partners (data subjects) in certain EU countries. This data transfer between the UK and EEA is covered by UK GDPR under the current UK adequacy regulations. We may also exchange personal data with data subjects in non-EU countries and this would be a restricted transfer under UK GDPR using the appropriate safeguard known as 'standard contractual clauses' (e.g., risk assessments).

We would always inform you ahead of acting on any instructions to proceed with any of our services, if there is a requirement for your personal data be transferred outside of the UK. Further details on international data transfers can be found [here](#).

This data sharing enables Gloucestershire Climate Commitment to supply the above documented services to you in a professional and timely manner, whilst undertaking quality control & regulatory compliance procedures. Furthermore, it ensures compliance with all necessary UK GDPR & Data Protection Act (2018) lawful requirements.

Gloucestershire Climate Commitment will share personal information with law enforcement or other authorities if required by applicable law. We will not share your personal information with any other third party.

## **Whether information must be provided by you, and if so, why?**

The provision of certain personal data including (but not limited to) contact name, email address and contact number is required from you. This enables Gloucestershire Climate Commitment to provide our climate commitment services to you.

We will inform you at the point of collecting information from you, whether you are required to provide this and any other additional information to us.

## **How long your personal information will be kept?**

- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any contractual, legal, or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- We will hold your personal data, including but not limited to, name, address, and contact details for the duration of your contracted agreement with Gloucestershire Climate Commitment plus 12 months after any contract end date, to facilitate aftersales support.
- Details of retention periods for different aspects of your personal data are available in our Document Destruction & Retention Policy which you can request from us by [contacting us](#).
- Any personal data held in hard document copy or on any end-of-life software/hardware (e.g., hard drives, discs, CD's) are securely stored pre-destruction after use and are destroyed with a Certificate of Destruction in line with our UK GDPR Document Destruction & Retention Policy.

## **Your rights**

Under the UK GDPR, Data Protection Act (2018) and ICO guidance you have several important rights free of charge. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the [Information Commissioner's Office \(ICO\) on individuals rights under the UK General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- ☐ Call, email, or write to us in the first instance.
- ☐ Let us have enough information to identify you,
- ☐ Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- ☐ Let us know the information to which your request relates?

## **Reasons we can collect and use your personal information.**

Gloucestershire Climate Commitment collects your personal data to enable us to provide our climate commitment services to you.

Gloucestershire Climate Commitment may also contact you by email, phone, video call or letter in line with the service you have registered for. We may occasionally email you or send a letter about something relevant to the service you have registered for.

Furthermore, we may email you to inform of organisational updates and items of interest via our official channels.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator (e.g., ICO) of a suspected data security breach where we are legally required to do so.

If you want detailed information from, Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **Cookies**

We use cookies to collect, store and share bits of information about your activities when you use our website. Cookies do different things, like letting you navigate between pages quickly and generally improving your experience of a website. If a website does not use cookies, it will think you are a new visitor every time you move to a new page on the website – for example, when you enter your login details and move to another page it will not recognise you and it will not be able to keep you logged in.

Gloucestershire Climate Commitment only use non-personal data essential cookies on this website to track the performance of the website via Google Analytics. This non personal data helps us to understand how to improve the website content for the benefit of all users. If you want to block cookies, then you can do this through your browser via the help function. You can also visit [www.aboutcookies.org](http://www.aboutcookies.org) for further guidance.

## **How to complain**

We hope that we can resolve any query or concern you raise about our use of your personal data.

The [UK General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioners Office (ICO) who may be contacted [here](#) or by telephone on 0303 123 1113.

## **Changes to this privacy notice**

This privacy notice was last reviewed and published on Friday May 21<sup>st</sup>, 2021.

We may change this privacy notice from time to time, when we do, we will inform you via email and/or our company website.

## **How to contact us**

Please contact us if you have any questions about this privacy notice or the information, we hold about you.

The Data Protection Officer (DPO) is Eoin McQuone.

If you wish to contact us, please send an email to [enquiries@sustainablebd.com](mailto:enquiries@sustainablebd.com) or write to Gloucestershire Climate Commitment, 21 Naunton Lane, Cheltenham, Gloucestershire, England, GL53 7BJ or call 0333 344 5890.