



## **Walworth Garden**

### **Data Protection & Security Policy, and Privacy Notice**

#### **Introduction**

Walworth Garden is committed to protecting the rights and freedoms of all people in order to safely and securely process their data in accordance with all of our legal obligations.

Walworth Garden shall comply with the principles of data protection enumerated in the UK General Data Protection Regulation. We will make every effort possible in everything we do to comply with these principles. The Principles are:

- Lawful, fair and transparent
- Limited for its purpose
- Data minimisation
- Accurate
- Retention
- Integrity and confidentiality

This policy is for the attention of all staff and beneficiaries of Walworth Garden in so far as they are requested to share, or required to process, personal information during the course of their employment or studies. This policy also pertains to the rights of any individuals about whom Walworth Garden holds personal data.

All staff at Walworth Garden have a responsibility to ensure they adhere to GDPR. This policy has been updated to comply with General Data Protection Regulation (also known as GDPR).

#### **Data and Information We May Collect From You**

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website ([www.walworthgarden.org.uk](http://www.walworthgarden.org.uk)) when registering to become a volunteer, requesting a place on our waiting lists, subscribing to our services, filing a complaint or requesting further information or services from us. This includes personal information such as contact information, and identity data.
- Any application materials sent to us for recruitment purposes
- Records of any correspondence if you contact us
- Details of your online visit to our website ([www.walworthgarden.org.uk](http://www.walworthgarden.org.uk)) including but not limited to traffic data, location data, operating system and keyword searches which may be used as part of our market research.

- Details such as your ethnicity, gender, and age that we ask you to provide when signing up to join an adult education or therapeutic programme with us, which we store and use to assess eligibility for funding opportunities.
- Copies of your learning agreement forms and any other documents shared with you during your course of study at Walworth Garden
- Notes on your attendance, and any other information pertaining to your participation in any course of study at Walworth Garden.
- Survey data following your attendance on programmes with us, which we use to gather feedback. These survey forms are optional.

### **Where and How we Store Your Personal Data**

All information provided to us via our website ([www.walworthgarden.org.uk](http://www.walworthgarden.org.uk)) or by email is stored on a secure password protected server that is maintained off-site. Access to this server is shared only with Walworth Garden staff members who need it, and they can only access this using two-factor authentication and/or a secure password management system. These passwords are required to be changed regularly. This data is not to be saved directly to mobile devices such as laptops, tablets, or smartphones that are removed or used outside of the workplace unless they have permission from the CEO.

Any payment transactions made via Walworth Garden website will be encrypted. Again, this information is only shared with the necessary members of staff. The data we collect from you may be transferred and stored at a destination outside of our organisation in order to provide the service you are requesting, such as Southwark Council and City & Guilds. By submitting your personal data, you agree to this transfer, storing, and processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

In cases when data is stored on printed paper, it is kept in a secure place where unauthorised personnel cannot access it. Once it is no longer required, the information will be destroyed.

### **What We Do With Your Personal Data**

Personal information which you supply to us may be used in a number of ways, for example:

#### **Clients/Customers**

- To send you a quotation for the services you have enquired about
- For invoice, audit and debt collection services
- Reminders for the same services or the ones you have enquired about
- To pass onto staff to enable them to carry out the services you have hired them for
- To contact you with feedback questionnaires regarding the service provided

#### **Adult Learning Courses & Training Attendees**

- To send you reminders of the upcoming training or course
- To be passed on to our funding bodies for finance and evidence
- To be passed on to our education bodies for registration and evidence to gain qualifications
- As audience research (how you found out about the course etc.)

- To contact you with feedback questionnaires regarding the service provided

#### Mailing Lists/Marketing

- To send updates on upcoming workshops and training
- To send you newsletters about the garden
- Updates to data, opening times and other important areas
- To send fundraising opportunities for the charity
- To promote Walworth Garden events

#### Volunteers

- To send induction dates and volunteering opportunities
- To book in and correspond with volunteers about volunteering days and times
- To ascertain suitable volunteering opportunities

#### Recipients of the Southwark Garden Project Scheme

- To contact you to book appointments
- To gain feedback of the service provided
- To be passed onto key team members in order to complete the service requested

We may also use your information in the following way:

- To ensure content on our website is presented in the most effective manner for you and your computer.
- To provide the user with relatable content
- To compile destination data for our funders

#### **Disclosure Of Your Information**

When signing up for an adult education or therapy programme with us, we are often required to pass your details along to external funding bodies and/or external education bodies. In these instances, the information you provide to us will be disclosed to third parties using a secure transfer process. These external organisations then take on the responsibility of protecting the data provided. More information on this can be found within their organisations' policies. If you need to know which third party organisations we might pass along your information to, please contact us using the details below.

We may also share your information, if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. This includes exchanging information with other organisations for the purposes of fraud protection.

#### **How Long We Keep Your Data**

We are required under UK tax law to keep your basic personal data (name, contact details) for a maximum of 7 years after which time it will be destroyed. The only exception to this is the details provided in Southwark Adult Learning forms completed when sign up for an adult education programme, which Southwark Council requires that we keep for 10 years. After this time, the data is destroyed.

#### **Your Rights & Accessing Your Information**

GDPR and the Data Protection Act 2018 gives you enhanced rights in relation to accessing information about you that we might hold. You have the right to ask us not to process your personal data for marketing purposes. We will gain your consent using an 'opt in' method on all our forms and website pages where we collect your data. These rights also include:

- Right to be informed
- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making including profiling.

You can exercise these rights at any time in accordance with the regulations. For example, you can ask us to erase any of your personal data that we might hold, or withdraw consent for us to contact you. To do so, please email or write to us using the contact information at the bottom of this document, and your request will be dealt with within a month.

### **Complaints & Appeals**

Any complaints or concerns should be directed to our CEO, Oliver Haden. Any information shared will be held in confidence, and will not undermine the complainant's position within the organisation. All staff and beneficiaries are encouraged to report any incidents of impropriety.

### **Changes to our privacy policy**

Any changes made to our privacy policy in the future will be posted on our website ([www.walworthgarden.org.uk](http://www.walworthgarden.org.uk)) and where appropriate will be emailed.

**This policy was last updated:** April 2023

**Next Review:** March 2024

**Contact:** Questions and comments regarding our privacy policy and data should be addressed to Walworth Garden:

Walworth Garden

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