



Privacy Notice Version 1.0 Date: 10th March 2021

Introduction

The intention of this policy is to clearly define to any individual how Tenbury Transport Trust processes 'Personal data' for which it has responsibility.

The definition of 'Personal data' is that as defined by the Data Protection Act 2018 / UK GDPR, this is primarily pieces of data that identify you as an individual.

In circumstances where any individual supplies 'Personal data' about themselves to Tenbury Transport Trust, we will become responsible for it legally as the 'Data Controller' and will process your data in accordance with the Principles and legal requirements of the Data Protection Act 2018 / UK GDPR.

Tenbury Transport Trust is registered with the Information Commissioners Office registration No. ZA853857 and is also a registered charity, registration No. 1155845

In circumstances where data is supplied to Tenbury Transport Trust about individuals by another party who is legally the 'Data Controller', we will legally have responsibility as the 'Data Processor' and conduct processing of that data under a legal contract with the Data Controller.

The definition of a 'Data Controller' or 'Data Processor' is that as defined by the Data Protection Act 2018 / UK GDPR.

Company Contact Details:

Tenbury Transport Trust

34, Teme Street, Tenbury Wells. WR15 8AA.

Insert Company Telephone No.: 01584 810 491

The appointed person responsible for Data Protection is Wendy White - Trustee

Why do we need your data?

We require Personal data from you to be able provide local community transport services which you have requested from us or provide information about them.

We will only ask for and keep the data needed to ensure we provide you with an efficient level of service, support and any legal commitments we have as a business.

We may also use Personal data we have gathered to contact and inform you of our services which we believe will be of genuine interest to you.

The Privacy Notice Matrix at the end of this policy gives details of what types of data we may store about you and the lawful basis for this.

What do we do with your data?

We have a responsibility to protect data we hold about you and ensure it is not accessed by anyone who is not authorised to use it for the reasons we legitimately hold it. We also have a responsibility to ensure that your data is accurate, retrievable and is not kept any longer than is necessary or legally required.

We have assessed the risks to the security of your data and implemented appropriate levels of Technical and Organisational measures to protect it. We will not store your data outside of the UK.

Access to your data will be shared with only those staff and volunteers who need it to provide you with the services you have requested or consented to receiving. We may also share address information with the provider of our online route planning system.

We will ensure that we have in place a Confidentiality Agreements all with those having access to your data.

We may be required to provide access to persons with legal authority to request access to it.

We will not pass your data to third parties to use for marketing of their own services.

The Privacy Notice Matrix at the end of this policy gives details of how long we may need to keep your data.

What happens if we lose your data or it is accessed by unauthorised persons?

If we detect that 'Personal data' we are holding as a Data Controller, has been lost or accessed by unauthorised persons (a Data Breach) and that this will potentially infringe your rights or cause you harm; we will inform you immediately of the data breach.

We will also be required legally to inform the Information Commissioners Office (the Governments data protection regulator) within 72Hrs of detecting the breach, who may then investigate our compliance with data protection legislation and effectiveness of our controls.

What rights do you have?

Data protection regulations give you a legal right to:

- A) request information on what data is held about you.
- B) have your data changed or deleted from our records.
- C) withdraw any consent given.
- D) have your data transferred.
- E) restrict processing of your data and/or objection to its processing.

To make a request under these rights please use the following:

E Mail: admin@tttrust.org.uk

Under normal circumstances we will not charge you for processing these requests and will respond to you within 30 working days. If we believe your request is complex and will be chargeable; we will first contact you before proceeding.

- F) To lodge a complaint with the Information Commissioner's Office

To make a complaint to the ICO (Information Commissioners Office) use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

General Enquiries?

If you would like to make any general enquiries about our data protection policies, please use the following contacts:

E Mail – admin@tttrust.org.uk or Call Tel: 01584 810 491

Links to other websites

Our website may contain links to other websites of interest. You should note that we do not have any control over those websites, and so cannot be responsible for the protection and privacy of any information which you provide whilst visiting them.

Use of Cookies on our Website.

A cookie is a small file sent to your computer's hard drive by a web page that you visit. Cookies allow web applications to recognise your device (IP Address), as you move from one page on the site to another, or if you revisit the site within a certain period of time. If you express a preference on a web page, for instance, that preference can then be recalled in the future. A cookie in no way gives us access to other files on your computer or to any other of your device's functions.

We use traffic log cookies to compile statistics about the popularity of pages on our site and about how people have arrived here. This helps us improve our website. **We only use this information for statistical purposes.**

You can choose to accept or decline cookies. Most web browsers automatically accept cookies; however, you can usually modify your browser settings to decline or block cookies if you prefer.

Acceptance of these terms

By using our website and/or our services, which require the use of your Personal data; you signify your acceptance of the terms of our privacy policy.

Please do not proceed, if you do not agree to the terms of our privacy policy and/or wish to enquire further about them.

We reserve the right to make changes to this Privacy Notice at any time.

Privacy Notice Matrix

Processing Activity	Personal Data required / held	Retention Time	Lawful Basis for Processing
Supply of Transport Services	Name, phone number (s), home address, E - Mail address, Health & Mobility details, NOK, DoB, Marital Status.	Duration of using Services / Membership	Contractual – in order to provide the transport service’s that you have ordered.
Marketing (Website / Publicity)	Images (Photo’s)	Until consent withdrawn by you	Consent – we will only use images with your prior consent.
Marketing (Postal)	Names & Addresses	Duration of using Services / Membership	Legitimate Interest – we will send you information which we believe will be of interest to you as a member.
CCTV Monitoring (Office Access)	Images (Video)	16 Days	Legitimate Interest – we monitor the Office frontage for the prevention of crime.
Dashboard Cameras (Minibuses)	Images (Video)	5-minute loop but has a crash sensor which will save footage until further notice should an incident take place. Once the incident has been closed the camera will be wiped.	Legitimate Interest – we utilise dashboard cameras in our transport for the purposes of health & safety.
Website Browsing	Internet Protocol Address (IP Address)	2 years	Consent– you have read & accepted our Website Policies which explain the use of cookies on the website you visited