Data Protection Policy

Tripod is committed to protecting your privacy, including online, and in the transparent use of any information you give us. This page sets out what information we may hold about you and how that data will be used. No information will be shared more widely than is set out below unless it is required by law.

We are registered with the Information Commissioner's <u>Data Protection Register</u> no. ZA811702

Tripod Ltd. Is registered as a Company Limited by Guarantee, operating as a non-profit workers' cooperative Registration number: SC359892

Address: 2 Old Hatton Mains, Dalmahoy, Kirknewton, Edinburgh, EH27 8EB,

Email: info@tripodtraining.org

If you sign up to our email list:

Tripod will record your name, email address, and postcode (for the purpose of sending you geographically relevant information). This information is processed via <u>MailChimp</u> (an industry-standard bulk email system) in order to maintain your subscription on our mailing list. It is not used for any other purpose and is not shared with any external organisations. You can unsubscribe from our mailing list or update your information whenever you wish by clicking an unsubscribe link in any of our emails or by emailing <u>info@tripodtraining.org</u>

If you make a donation:

Tripod will hold a record of your name, postal address and any email address(es) or telephone numbers you register with us for the purpose of administrative communication. This information is safely stored in our Customer Relationship Management System (CRM) and you can amend it at any time by contacting us. We do not retain any card or bank account details. All online donations are securely processed via accredited donation platform or Paypal . We will never share your contact information externally unless required by law, and we will only contact you for non-administrative purposes if you have explicitly given us permission to do so. You will only be subscribed to our mailing list (see above) if you request it. You can update your communication preferences at any time.

If you book or attend an event:

Tripod holds a record of people who have registered for our events for administrative communication. If you provide information about accessibility needs, we will only process this information in order to ensure accessibility and provide for your safety. We sometimes use <u>Eventbrite</u> to manage our event registrations and collect attendance fees. Event payments are processed securely either via Eventbrite (if paying by card) or <u>Paypal</u> (if this is the selected option). You will only be subscribed to our mailing list (see above) if you request it. You can update your communication preferences at any time. We may take

photos or record videos at events to promote and archive our work. It is your responsibility to make it known to us if you do not wish to be in a photo or video.

Website, cookies and browsing:

Our main website (tripodtraining.org) uses SSL (Secure Sockets Layer) is a protocol which encrypts data transfer between our website and your browser. It encrypts all of your personal information, so that it cannot be read as the information travels over the internet. While on a secure page the lock icon on web browsers becomes locked, as opposed to unlocked, or open, when you are just surfing. Additionally, our choice of payment provider allows us to never hold your credit card details on our website.

This site will set anonymous cookies if your browser is set to accept them, and they will be used by <u>Google Analytics</u> to track page visits which helps us monitor how our content is performing.

DETAILED INFORMATION BELOW:

Retention of data

Tripod only retains members' and contacts' personal information for as long as necessary to fulfil the purposes it was collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When determining the appropriate retention period for personal data, FoE Scotland considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which the personal data is processed, whether Tripod can achieve those purposes through other means, and the applicable legal requirements.

After the data retention period has expired, Tripod securely destroys personal information.

Data security

Tripod has put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Data sharing

Tripod requires third parties to respect the security of personal data and to treat it in accordance with the law. Tripod may also need to share personal information with a regulator or to otherwise comply with the law.

The following third-party service providers process personal information about members and contacts for the following purposes:

- Mailchimp: Sending email newsletters to subscribers
- EventBrite: Handling registrations and bookings for events

Transfer of data outside the EU

Tripod, like all other organizations using these services, transfers personal information to the United States for processing by Mailchimp and EventBrite. Transfers to these suppliers are covered by the EU-US Privacy Shield Agreement, which ensures EU standards are adhered to wherever data is processed. Should the EU-US Privacy Shield be reviewed, Tripod will ensure any suppliers processing personal data will continue to adhere to EU standards.

Data subject rights

You have the right to:

- Request access to the personal information that we hold about you (commonly known as a "data subject access request").
- Ensure that the information we hold about you is accurate and complete.
- Complain to the Information Commissioner (<u>www.ico.org.uk</u> or 0303 123 1113) if you think we have not treated your data properly within the law.

Under certain circumstances you also have the right to:

- Request erasure of your personal information.
- Object to the storage or use of your personal information.
- Request the restriction of processing of your personal information.
- Request the transfer of personal information to another party.

If you wish to make a request on any of the above grounds, you should contact the Tripod. Please note that, depending on the nature of the request, Tripod may have good grounds for refusing to comply. If that is the case, you will be given an explanation by Tripod.

Data subject access requests

Tripod has a process for handling data subject access requests. In the first instance, please contact info@tripodtraining.org or the postal address above. Tripod may need to request specific information to help confirm your identity and ensure the right to access the information (or to exercise any of the other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You will not normally have to pay a fee to access personal information (or to exercise any of the other rights). However, Tripod may charge a reasonable fee if the request for access is clearly unfounded or excessive. Alternatively, Tripod may refuse to comply with the request in such circumstances.

COMPLIANCE WITH THIS POLICY

The Membership and Office Manager is tasked with overseeing compliance with this policy. If contacts or members have any questions about this policy or how Tripod handles personal information, they should contact the Membership and Office Manager. Data subjects have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Data security breaches

Tripod has put in place procedures to deal with any data security breach and will notify members and contacts and any applicable regulator of a suspected breach where legally required to do so.