

Privacy Policy

Culture Coventry Trust is committed to ensuring that your privacy is protected when you use the Trusts services. The Privacy Notice below explains how your information is used and how your privacy is protected.

The Trust employs a Data Protection Administrator, if you have any concerns or questions about how your information is kept please contact the Data Protection Administrator at DPA@culturecoventry.com

Privacy Notice

What your Personal Information is used for?

What is Personal Information?

Personal Information can be anything that identifies and relates to a living person. This can include information that, when put together with other information, can then identify a person. For example, this could be someone's name and contact details.

Some personal information is 'special'

Some information is 'special' and needs more protection due to its sensitivity. It is often information that you would not want widely known and is very personal to you. This is likely to include anything that can reveal:

- sexuality and sexual health;
- religious or philosophical beliefs;
- ethnicity;
- physical or mental health;
- trade union membership;
- political opinion;
- genetic/biometric data;
- criminal history.

Why does the Trust need your Personal Information?

The Trust may need to use some information about you to:

- deliver services and support to you;
- manage those services we provide to you;
- train and manage the employment of our workers who deliver those services;
- help investigate any worries or complaints you have about your services;
- check the quality of services; and
- to help with research and planning of new services.

How the law allows us to use your Personal Information

There are several legal reasons why we need to collect and use your Personal Information.

Generally, the Trust will collect and use personal information where:

- you have given consent;
- you have entered into a contract with us;
- it is necessary to perform our duties and provide our services;
- it is required by law;
- it is necessary for employment purposes;
- you have made your information publicly available;
- it is necessary for archiving, research, or statistical purposes;

If we have consent to use your Personal Information, you have the right to remove it at any time. If you want to remove your consent, please contact DPA@culturecoventry.com

We only use what we need!

Where we can, we will only collect and use Personal Information if we need it to deliver a service or meet a requirement.

If we don't need your Personal Information, then we will either keep you anonymous if we already have your information for another purpose, or we won't ask you for it. For example, in a survey we may not need your contact details, so we will only collect your survey responses.

If we use your Personal Information for research and analysis, we will always keep you anonymous unless you have agreed that your Personal Information can be used for that research.

We do not sell your personal information to anyone else.

You can ask for access to the Personal Information

You have the right to ask for all the Personal Information we have about you and the services you receive from us. When we receive a request from you in writing, we must give you access to everything we have recorded about you.

However, we cannot let you see any parts of your records that contain:

- confidential information about other people; or
- data that a professional believes will cause serious harm to you or someone else's physical or mental wellbeing; or
- information that we think may stop us from preventing or detecting a crime.

This applies to Personal Information that is in both paper and electronic records.

If you cannot or are unable to ask for your records in writing, then we will make sure that there are other ways that you can request your records. If you have any queries about access to your Personal Information please contact DPA@culturecoventry.com

You can ask us to make changes to your Personal Information

You should let us know if you disagree with something that is contained within the Personal Information or records that we hold in relation to you.

We may not always be able to change or remove that Personal Information, but we will correct factual inaccuracies and may include your comments in the record to show that you have requested the change.

You can ask us to delete Personal Information ('right to be forgotten')

In some circumstances, you can ask for your Personal Information to be deleted, for example:

- where your Personal Information is no longer needed for the reason that it was collected in the first place;
- where you have removed your consent for us to use your Personal Information (where there is no other legal reason or legitimate purpose for us to use it);
- Where there is no legal reason for the use of your Personal Information;
- Where deleting the Personal Information is a legal requirement.

Where your Personal Information has been shared with others, we will do what we can to make sure those using your Personal Information comply with your request for erasure.

Please note that we cannot delete your Personal Information where:

- we are required by law to hold such information;
- it is used for freedom of expression;
- it is used for public health purposes;
- it is for, scientific or historical research, or statistical purposes where it would make information unusable;
- it is necessary for legal claims.

You can ask to limit what we use your Personal Information and Data for

You have the right to ask us to restrict what we use your Personal Information for where:

- you have identified inaccurate information, and have told us of it;
- where we have no legal reason to use that information, but you want us to restrict what we use it for rather than erase the information altogether.

When Personal Information is restricted, it cannot be used other than to securely store the data and with your consent to handle legal claims and protect others, or where it is for important public interests of the UK.

Where restriction of use has been granted, we will inform you before we carry on using your Personal Information.

Where possible we will seek to comply with your request, but we may need to hold or use your Personal Information because we are required to by law.

You can ask to have your Personal Information moved to another provider (Data Portability)

You have the right to ask for your Personal Information to be given back to you or another service provider of your choice in a commonly used format. This is called Data Portability.

It is likely that Data Portability will not apply to most of the services you receive from the Trust.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things contained within your Personal Information, e.g. your health conditions.

Who do we share your Personal Information with?

We use a range of organisations to either store Personal Information or help deliver our services to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with Data Protection law.

We will often complete a Privacy Impact Assessment (PIA) before we share Personal Information to make sure that we protect your privacy and comply with the law.

Sometimes we have a legal duty to provide Personal Information to other organisations. This is often because we are required by law to provide this information, such as when we are required by court orders to provide the information.

We may also share your Personal Information when we feel there is a good reason that is more important than protecting your privacy. This does not happen often, but we may share your Personal Information:

- in order to stop fraud; or if there are serious risks to the public, our staff or to other professionals;
- to protect a child; or
- to protect adults who are thought to be at risk.

For all of these reasons, the risk must be serious before we can override your right to privacy. If this is the case, we will make sure that we record what Personal Information we share and our reasons for doing so. We will let you know what we have done and why if we think it is safe to do so.

How do we protect your Personal Information?

We will do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we will only make them available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what is called a 'cypher'. The hidden information is said to then be 'encrypted';
- Pseudonymisation, meaning that we will use a different name so we can hide parts of your Personal Information from view. This means that someone outside of the Trust could work on your Personal Information for us without ever knowing it was yours;
- Controlling access to systems and networks allows us to stop people who are not allowed to view your Personal Information from getting access to it;
- Training for our staff allows us to make them aware of how to handle Personal Information and how / when to report when something goes wrong;

- Regular testing of our technology and ways of working including keeping up to date on the latest security updates.

How long do we keep your Personal Information?

There is often a legal reason for keeping your Personal Information for a set period of time, so that we try to include all of these in our retention schedule.

For each service, the schedule lists how long your Personal Information may be kept for. This ranges from months for some records to decades for historical records.

Where can I get advice?

If you have any worries or questions about how your Personal Information is being handled by the Trust, then please contact our Data Protection Administrator at DPA@culturecoventry.com

Cookies (not the edible ones) and how you use this website

To make this website easier to use, we sometimes place small text files on your device (for example your iPad or laptop) called cookies. Most big websites do this too.

They improve things by:

- remembering the things you have chosen while on our website, so you do not have to keep re-entering them whenever you visit a new page;
- remembering data you have given (for example, your address) so you do not need to keep entering it;
- measuring how you use the website so we can make sure it meets your needs;

By using our website, you agree that we can place these types of cookies on your device.

We do not use cookies on this website that collect information about what other websites you visit (often referred to as privacy intrusive cookies).

Our cookies are not used to identify you personally. They are just here to make the site work better for you. You can manage and/or delete these files as you wish.

To learn more about cookies and how to manage them, visit AboutCookies.org

Measuring how you use this website (something called 'Analytics')

We use 'Analytics' to collect information about how people use our website. We do this to make sure it is meeting peoples' needs and to understand how we can make the website work better.

'Analytics' stores information about what pages on this site you visit; how long you are on the site; how you got here; and what you click on while you are here.

We do not collect or store any other Personal Information (e.g. your name or address) so this data cannot be used to identify who you are.

We also collect data on the number of times a word is searched for and the number of failed searches. We use this information to improve access to the site and identify gaps in the content and see if it is something we should add to the site.