

Privacy Policy for TENT Website & Other Social Media

Last Updated: May 2018

TENT takes your privacy very seriously and is committed to protecting your personal information. This privacy policy sets out the way in which any personal information you provide to us is used and kept secure by TENT. It applies whenever we collect your personal data (including when you use our website or other digital platforms), so please read it carefully. We also explain your rights in respect of your personal data.

Please note our other Cookie Policy and Terms and Conditions that go along with this Privacy Policy, all of which can be found on our website, www.middlepark.org.uk

About us

TENT is a registered charity 1157433. Registered at 25 Hightown Road, Wrexham, LL13 8EB

Information we collect and what we use it for

All personal information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this privacy policy. We may supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organisations, for example, our sponsors and partners.

In broad terms, we use your data for the following purposes:

- to administer and provide products and services you request or have expressed an interest in
- to communicate with you in the event that any products or services you have requested are unavailable
- for fraud screening and prevention purposes
- for record keeping purposes
- to track your activity on our digital platforms
- to personalise and/ tailor any communications that we may send you

When we provide you with products or services we may collect and store any personal information that you provide to us. We may, for example, keep a record of your name, address, delivery address, email address, telephone number and payment card details.

When you interact with our digital platforms, we may also automatically collect the following information about your visit. This is primarily to help us better understand how our fans use our digital platforms to enable us to create better content and more relevant communications.

- how you have reached our digital platform and the internet protocol (IP) address you have used
- your browser type, versions and plug-ins, and your operating system
- your journey through our digital platform, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information
- which videos you have watched and for how long
- what content you like or share
- which adverts you saw and responded to
- which pop up or push messages you might have seen and responded to
- your subscription status
- information collected in any forms you complete

We may also infer your country of location from the IP address you have used to access our digital platforms.

Communications and Marketing

We will contact you by post, and where you have provided consent, also by telephone and e-mail, to let you know about our events and activities that might be of particular interest to you; about the work of TENT more generally. We provide the opportunity for you to opt-out from receiving our marketing communications every time we contact you.

You can opt-out from receiving our marketing communications or update your contact preferences at any time by emailing: info@middlepark.org.uk

Newsletter Sign Up

As part of the registration process for our e-newsletter, we collect personal information. We use that information for a few reasons: to inform you about things you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied with your newsletter experience. We don't rent or trade email lists with other organisations and businesses.

We may use a third-party provider, MailChimp, to deliver our newsletter at some point in the future. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see MailChimp's [privacy notice](#).

You can unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of any of our emails.

How long do we retain your Personal Data?

We will only retain your Personal Data for as long as it is necessary to satisfy the purpose for which it was provided by you or collected by us (for example, for the time necessary for us to answer queries or resolve problems).

We may therefore retain your Personal Data for a reasonable period after your last interaction with us. When the Personal Data that we collect is no longer required in this way, we destroy or delete it in a secure manner. We may, instead of destroying or erasing your Personal Data, make it anonymous so that it cannot be associated with or tracked back to you. In certain cases, we may have legal or regulatory obligations that require us to retain specific records for a set period of time. In the event that you ask us to stop sending you marketing communications, we will retain certain details, such as your name, to help us ensure that you are not contacted again.

Disclosure of your information

In order to provide our services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These may include, for example, payment processing organisations, delivery organisations, fraud prevention/screening/credit risk management companies, and mailing houses.

We may also share your data with our selected partners (for example, other TENT teams), in order to occasionally offer you a service or opportunity that your data suggests would be of interests to you. In such cases, we will clearly notify you of the sharing, and you will have the choice not to participate to such sharing.

We may share your data with third parties for the following reasons:

- a) if we are under a legal or regulatory duty to do so,
- b) if it is necessary to do so to enforce our terms of use, terms and conditions of sale or other contractual rights,
- c) to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity,
- d) where such disclosure is necessary to protect the safety or security of any persons, and/or
- e) otherwise as permitted under applicable law.

Some of the organisations to which we may disclose your personal information are situated outside of the United Kingdom and European Union in countries which may not have laws that protect privacy rights as extensively as in the United Kingdom. If we do transfer your personal information to other territories, we will take proper steps to ensure that your information is protected in accordance with this privacy policy.

Consistent with applicable legal requirements, we take reasonable steps to require third parties to adequately safeguard your Personal Data and only process it in accordance with our instructions or as co-controllers.

Use of cookies

The TENT Website uses “cookies” to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalise TENT pages, or register with TENT site or services, a cookie helps TENT to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same TENT Website, the information you previously provided can be retrieved, so you can easily use the TENT features that you customised.

Most browsers are set to automatically accept cookies by default, but you can change this setting. For instructions on how to find and accept/reject cookies for your browser, please read its help information.

For further, more detailed information on how we use cookies, please refer to our separate Cookie Policy available on our website.

Social Media and Other Websites

When you participate in any of our TENT profiles or wherever TENT is present in any of the various social media forums like Facebook, Twitter, Pinterest, Instagram, Youtube, etc, you should be familiar with and understand the tools provided by those sites that allow you to make choices about how you share the Personal Data in your social media profile(s).

For these forums the privacy practices or policies of these third parties apply, so we encourage you to read the applicable privacy notices, terms of use and related information about how your Personal Data is used in these social media environments.

Please note that our website and other digital platforms may contain links to third party websites/digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own digital platforms. We recommend that you check the privacy and security policies and procedures of each and every other website / digital platform that you visit.

Where we store your Personal Information

The data that we collect from you may be transferred to and stored at a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of

your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. TENT will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Security of information

We take the security of your personal information seriously. When you submit your credit card details to us, we use industry standard Secure Sockets Layer (SSL) encryption technology to guard your information. In addition, we have security procedures in place to protect our paper-based systems and computerised databases from loss and misuse, and only allow access to them when it is absolutely necessary to do so, and then under strict guidelines as to what use may be made of the personal information contained within them.

What lawful bases do we rely on to use your personal data?

The lawful bases that we rely on for processing your personal data are:

- You have provided your consent to us using your personal data for a specific purpose:
- We will ask for your consent to use your personal data to send you electronic communications such as newsletters and emails.
- You always have the right to withdraw your consent at any time.
- It is necessary in connection with the performance of a contract with you:
- Sometimes it is necessary to process your personal data so that we can enter into contractual relationships with you.
- It is necessary for compliance with a legal obligation to which we are subject:
This would include where we have to retain certain records, for example. Or where we are required to disclose personal data to any regulators or law enforcement agencies.
- It is within our legitimate interest. Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (as long as the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this basis to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights.

- We will also rely on our legitimate interests for the proper administration of TENT, and to manage our operations (for example, maintaining appropriate records and databases or providing useful reports and feedback to our Trustees/Members). When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law) and we will also take steps to protect that data whenever possible through processes such as providing your data in anonymous form.

Sensitive or Special Category Data

We do not anticipate collecting sensitive data from you (i.e. data on health, ethnicity, race, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, sex life or sexual orientation) through our online platforms and we if we ever do we will ensure that we obtain your prior explicit consent. You always have the right to withdraw your consent.

Your Rights

The following are examples of your rights and how to enact them.

- Right to restrict or object to processing - In certain circumstances you have a right to require us to stop processing your personal data in a particular way. For example, you may wish to opt-out of receiving some or all of our marketing communications. Under such circumstances, you can request restriction of, or object to, our processing personal data about you by contacting us on info@middlepark.org.uk
- Right to erasure - You have the right to request that your personal data is erased from our database in certain circumstances.
- Right of access - You have a right to ask for a copy of the personal data we hold about you. If you want to access your personal data (free of charge), please send a description of the personal data you want to see and proof of your identity to info@middlepark.org.uk
- Right to rectification - We want to make sure that your personal data is accurate and up to date. Please let us know if your details change via info@middlepark.org.uk You may also ask us to correct or remove personal data which is inaccurate by contacting us in the same way.
- Right to data portability - In certain circumstances you have a right to data portability which means we will provide you (or a third party you nominate) with your personal data in a structured, commonly used and machine-readable format.

Please include enough relevant information when you contact us as this helps us to ensure that we accept amendments only from the correct person. We encourage you to promptly update your personal information if it changes.

Please note that you may only use/ benefit from some of these rights in limited circumstances. For more information, we suggest that you consult guidance from the Information Commissioner's Office (ICO) www.ico.org.uk or please contact us using the details at the end of policy.

Changes to this Privacy Policy

We aim to meet high standards and so our policies and procedures are therefore constantly under review. From time to time we may change this privacy policy. Accordingly, we recommend that you check our website periodically in order to review the latest version of this document.

Where to Make a Complaint

If you have a complaint regarding any aspect of how your personal data is handled by us, or with this privacy policy, then please write to us on info@middlepark.org.uk and we will work hard to listen to you respecting your complaint. We will take every step to try to ensure the matter is resolved to your expectations.

In the unlikely event that you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner's Office at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can also contact the Information Commissioner's Office using their online form: <https://ico.org.uk/global/contact-us/email>

How to Contact Us Regarding our Privacy Policy

Email: info@middlepark.org.uk

Mail: Team Leader
25 Hightown Road
Wrexham
LL13 8EB

Please include enough relevant information when you contact us as this helps us to ensure that we only accept and act on communiques from those we can correctly identify.