



## **Colour Blind Awareness CIC and Colour Blind Awareness (Consulting Ltd): Privacy Policy**

### **What data do we collect?**

In the course of our business we may collect a range of personal data from you, including when you engage our services, when you contact us, or because of your relationship with our staff, partners, trustees or clients.

#### **The personal data that we collect may include:**

- Basic information such as your name, company and job title
- Contact information – postal address, email address, phone number
- Financial information
- Identification and company information provided by you or collected as part of our due diligence
- Personal information provided to us by or on behalf of our clients and partners or generated by us in the course of providing services to them

### **Why do we need your data?**

We need to collect your personal data in order to do the following:

- Perform our contracted services
- Contact you for marketing purposes or to complete the sale of goods ordered via this website
- Process employment applications
- Process and respond to complaints
- Respond to queries by email, telephone or letter
- Comply with our charitable and regulatory obligations, including anti-money laundering, conflict, reputational and financial checks

## Our Legal Obligations

The General Data Protection Regulation (GDPR) is the law on data protection and privacy for individuals in the EU. It means we must tell you the following things about your personal data that we collect:

- How we collect it
- If it is shared with anyone else
- How it will be used, and our “lawful basis” under GDPR, for using it this way
- How long we hold it for
- Your rights regarding your personal data that we hold, how you can request a copy of it and request we remove it from our records.
- You can find out more about the GDPR at the Information Commissioner’s Office (ICO) website <https://ico.org.uk/> The ICO is the data protection regulator in the UK.

While we must comply with the law, we also want to be transparent about the information we collect on our website, and in how we use it. This Privacy Policy explains this and will be updated from time to time. It was last updated on 08 July 2019.

We, Colour Blind Awareness CIC and Colour Blind awareness (Consulting) Ltd, are the ‘Data Controller’ of the personal data we collect. This means we determine the way your personal data is used.

## How We Collect Personal Data

We collect personal data about you when you fill in and submit forms on this website. We also collect website usage information using Cookies.

## What happens to your data when you interact with our website

This is how we use the personal data you submit:

If you contact us via email, including via the link [info@colourblindawareness.org](mailto:info@colourblindawareness.org) from the About Us section of our website

<b>Contact Type</b>	<b>Use</b>	<b>Lawful basis of use</b>	<b>Why we think this applies</b>	<b>Retention period</b>
Contact Us	We will use your information to respond to your enquiry.	Consent	You offer us your data for the specific reason stated when you contact us.	Until we have resolved your enquiry, or if you become a customer, we will retain your data.
Purchase goods from us	We will use your information to complete the sale or respond to your enquiry.	Consent	You offer us your data for the specific reason stated on the form you completed.	Ongoing as necessary for the purposes of the sale /donation for which you have submitted your information. Before you complete a purchase you will be transferred to Paypal. We do not have access to your financial information and refer you to Paypal for details of their privacy policy.

## **Cookies**

Like most websites, ours may use cookies.

### **What are cookies?**

Cookies are text files placed on your computer or other device, and stored there, when you visit a website. This allows the website to recognise you as a user for the duration of your visit (using a 'session cookie') or for repeat visits (a 'persistent cookie').

Cookies don't hold personal data about you, for example they don't store your name or email address, but they may store information such as your computer settings, operating system and platform and IP address.

## How do we use cookies?

We may use cookies in several ways:

- To ensure our website works as you'd expect and giving you a more personalised experience.
- Google Analytics. This tells us information such as how many visits we get to our website, which pages are looked at and how long visits last. It helps us make decisions about improving our website. You can choose to opt out of Google Analytics by clicking this link <https://tools.google.com/dlpage/gaoptout>
- Facebook Analytics. We may use a Facebook pixel on this website. This helps us tailor any Facebook advertising we may do for our website users. It also helps us measure its effectiveness. You can manage your Facebook settings to opt out by clicking this link [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen#](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen#)

## How to turn off cookies

Most web browsers accept cookies automatically, but you can change the settings of your browser to stop cookies. Please remember that if you turn off cookies in your browser then these settings apply to all websites not just this one.

The most popular web browsers allow you to manage cookies. Just follow the instructions on typing 'Manage cookies' plus the browser name for each of the following browsers

Chrome

Firefox

Internet Explorer

Edge

Safari (Safari Mobile browser)

Opera

## Do We Share Your Data?

No. We do not share your data with any third parties, except to Think Noodle Games and then only where you have purchased a Think Noodle product via our website. Think Noodle only receive information relevant to enable them to process their element of your order.

We do not sell or rent your data to any third party.

## Your Rights

Under GDPR you have the following rights regarding your personal data:

- The right to be informed – how we collect and use your personal data
- The right of access – to request access to your personal data
- The right to rectification – to have your personal data corrected if it is inaccurate and to have incomplete personal data completed
- The right to erasure- (also known as the Right to be Forgotten) – to have your personal data erased
- The right to restrict processing – to request the restriction or suppression of your personal data
- The right to data portability – to obtain your personal data, and reuse it for your own purposes
- The right to object – to us processing your personal data
- Rights in relation to automated decision making and profiling – to request information about the processing and challenge a decision.

## Links To Other Websites

This Privacy Policy does not cover any websites that you can link to from within this website. Please remember to read the Privacy Policy on other websites that you visit.

If you wish us to take any action with your personal data or to complain about how we handle it, please contact us at: [info@colourblindawareness.org](mailto:info@colourblindawareness.org)

We will aim to respond to you within 30 days.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office on their website via this link <https://ico.org.uk/make-a-complaint/> or by calling +44(0)303 123 1113.

# Data Protection Policy

## Introduction

Colour Blind Awareness CIC and Colour Blind Awareness (Consulting Ltd)

Jointly and severally known as The Company are committed to being transparent about how we collect and use the personal data of our workforce, and to meeting our data protection obligations. This policy sets out the commitment of both organisations to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of job applicants, employees, contractors, volunteers, interns, apprentices and former employees, referred to as HR-related personal data. [This policy does not apply to the personal data of clients or other personal data processed for business purposes.]

The Company has appointed Kathryn Albany-Ward as its data protection officer. His/her role is to inform and advise the Company on its data protection obligations. He/she can be contacted at [info@colourblindawareness.org](mailto:info@colourblindawareness.org) Questions about this policy, or requests for further information, should be directed to the data protection officer.

## Definitions

**“Personal data”** is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

**“Special categories of personal data”** means information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

**“Criminal records data”** means information about an individual’s criminal convictions and offences, and information relating to criminal allegations and proceedings.

## Data protection principles

The Company is committed to the principles of the GDPR and processes personal data in accordance with the following data protection principles:

- The Company processes personal data lawfully, fairly and in a transparent manner.
- The Company collects personal data only for specified, explicit and legitimate purposes.
- The Company processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- The Company keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- The Company keeps personal data only for the period necessary for processing.
- The Company adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

- The Company tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons.
- Where the Company processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with the requirements of the GDPR and the provisions set out in this policy. The Company will retain special categories of personal data or criminal records which it processes to perform obligations or to exercise rights in employment law for a minimum of 5 years.
- The Company will update HR-related personal data promptly if an individual advises that his/her information has changed or is inaccurate.
- Personal data gathered during employment is held in the individual's personnel file (in hard copy or electronic format, or both), and on HR systems. The periods for which the Company holds HR-related personal data are contained in its privacy notices to individuals.
- The Company keeps a record of its processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

### **Individual rights**

As a data subject, individuals have a number of rights in relation to their personal data.

#### *Subject access requests*

Individuals have the right to make a subject access request. If an individual makes a subject access request, the Company will tell him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks the Company has failed to comply with his/her data protection rights; and
- whether or not the Company carries out automated decision-making and the logic involved in any such decision-making.

The Company will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to [info@colourblindawareness.org](mailto:info@colourblindawareness.org). In some cases, the Company may need to ask for proof of identification before the request can be processed. The Company will inform the individual if it needs to verify his/her identity and the documents it requires.

The Company will normally respond to a request within a period of one month from the date it is received. In some cases, such as where the Company processes large amounts of the individual's data, it may respond within three months of the date the request is received. The Company will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, the Company is not obliged to comply with it. Alternatively, the Company can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the Company has already responded. If an individual submits a request that is unfounded or excessive, the Company will notify him/her that this is the case and whether or not it will respond to it.

### *Other rights*

Individuals have a number of other rights in relation to their personal data. They can require the Company to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if the individual's interests override the Company's legitimate grounds for processing data (where the Company relies on its legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the Company's legitimate grounds for processing data.

To ask the Company to take any of these steps, the individual should send the request to [info@colourblindawareness.org](mailto:info@colourblindawareness.org)

### **Data security**

The Company takes the security of HR-related personal data seriously. The Company has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where the Company engages third parties to process personal data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **International data transfers**



The Company will not transfer HR-related personal data to countries outside the EEA.

### **Individual responsibilities**

Individuals are responsible for helping the Company keep their personal data up to date. Individuals should let the Company know if data provided to the Company changes, for example if an individual moves' house or changes his/her bank details.

Individuals may have access to the personal data of other individuals in the course of their employment. Where this is the case, the Company relies on individuals to help meet its data protection obligations to staff and clients.

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the Company) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the Company's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the Company's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

### **Training**

The Company will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

### **Enquiries**

If you wish us to take any action with your personal data or to complain about how we handle it, please contact us at: [info@colourblindawareness.org](mailto:info@colourblindawareness.org)

We will aim to respond to you within 30 days.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office on their website [here](#) or by calling +44(0)303 123 1113.

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