Mapping for Change CIC – Data Protection Policy and Privacy Notice

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities if you have a complaint.

Who we are

Mapping for Change CIC ("We") depends on the collection and analysis of information about living individuals in order to carry out research. This information may be obtained from an individual or organisation. We also need to collect and use certain types of information about people with whom we deal in order to operate. These include current, past and prospective employees, suppliers, clients, volunteers, research participants and others with whom we communicate. Some personal information may also be collected through the use of the Mapping for Change (MfC) website and the Community Maps platform. When we do so we are regulated under the UK Data Protection Act 2018 (UK DPA) and the UK General Data Protection Regulation (UK GDPR) and adhere to its Principles which state that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner
 that is incompatible with those purposes; further processing for archiving purposes in the public
 interest, scientific or historical research purposes or statistical purposes shall not be considered
 to be incompatible with the initial purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they
 are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure
 that personal data that are inaccurate, having regard to the purposes for which they are
 processed, are erased or rectified without delay ('accuracy');
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');
- processed in a manner that ensures appropriate security of the personal data, including
 protection against unauthorised or unlawful processing and against accidental loss, destruction
 or damage, using appropriate technical or organisational measures ('integrity and
 confidentiality').



We are responsible as 'controller' of any personal information we hold about you for the purposes of those laws.

The personal information we collect and use

Mapping for Change runs two websites, or platforms, from which we may collect personal information when and if you provide it to us. These two websites are MfC's company website, mappingforchange.org.uk, and Community Maps, communitymaps.org.uk.

To register you as part of our newsletter contact list from our website, we collect the following personal information when you provide it to us.

- Your name
- Your email address

To register you as a user of Community Maps, we may collect the following personal information when you provide it to us:

- Your name
- Your postcode
- Your email address
- Your telephone number(s)

We want to provide you with the best user experience when using our website so collect certain technical information, including, where available, your IP address; operating system; and browser type, for system administration and monitoring purposes. This is statistical data about our users' browsing actions and patterns, and does not identify any individual, nor will we make any attempt to find out the identities of those visiting our websites. This information is collected using a technology commonly referred to as cookies. For EU GDPR and UK GDPR compliance purposes, we always ask you to consent to these cookies before you can use our services. For more information about which cookies we use and why, please have a look at our <u>Cookie Policy Statement</u>.

Part of MfC's core business is to undertake research. Respondents to any research undertaken by MfC are common Data Subjects. Consequently, the correct treatment of their Personal Data is a priority. The type of personal data collected from respondents and participants will vary depending on the nature of the research and will be made clear at the point of collection and consent.

Personal Data will only be processed following consent by the Data Subject. Before giving consent, the Data Subject will be informed in accordance with our transparency principles. The declaration of consent will be obtained in writing or electronically for the purposes of documentation. In some circumstances, such as telephone interviews, consent can be given verbally. In all cases, the granting of consent will be documented. Any consent will only be valid if it constitutes a freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which it gives a statement, by a clear affirmative action signifying agreement to the processing of the Personal Data relating to him/her.



How we use your personal information

Mapping for Change use your personal data:

- To provide goods and services to you
- To safeguard our colleagues, contractors and workers, including in relation to the risk of modern slavery and exploitation
- With your agreement, to contact you electronically about products, services and projects which we think may interest you
- Where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).
- From images and videos of events and activities for reporting and marketing purposes but only according to specific consent given.

On the Mapping for Change website, we will use your personal data to:

- Send you our e-newsletter
- Send you any other outstanding updates about our activities, projects, partners and what we have been up to recently

On the Community Maps platform, we will use your personal data to:

- Verify your identity and validate your Community Maps registration.
- To enable you to log-in and access or contribute to Community Maps.
- To ensure that you receive feedback and responses to matters that you have raised.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

Use of any data collected as part of a research project will be clearly outlined prior to acquiring informed consent for such purposes.

Who we share your personal information with

If you are an **EU citizen**, the personal information we collect is protected under the EU GDPR law. This means we will share personal information with law enforcement or other authorities if required by applicable law. Under the EU GDPR, the <u>European Data Protection Board</u> is the highest supervisory authority. We limit access to your personal information to third-party services for the operation of our service. Under EU GDPR, this access must be restricted to third parties from within the EU. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

If you are a **UK citizen**, the personal information we collect is protected under the UK GDPR law. This means we will share personal information with law enforcement or other authorities if required by



applicable law. Under the UK GDPR, <u>the Information Commissioner's Office</u> (ICO) is the highest supervisory authority. It is its leading supervisor, regulator and enforcer of the UK-GDPR. Besides, under UK-GDPR, the protection of personal data can be bypassed under certain exceptional circumstances:

- When in matters of national security
- When in matters of intelligence services
- When in matters of immigration

We also limit access to your personal information to third-party services for the operation of our service. Any third parties processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. MfC will not share your data with any third-party organisations in relation to it's research without prior consent.

MfC often works in partnership with other organsations on specific projects. In such circumstances where personal data is shared with partners, this will be made explicit at the point of requesting the Data Subject's consent.

How long your personal information will be kept

- We will hold your personal data collected for our Newsletter contact list until you express your will to have your data withdrawn from our database.
- We will hold your personal data for the duration in which your Community Maps account is maintained.

Further details on retention periods can be found in the table below.

Reasons we can collect and use your personal information

When you register as a user of Community Maps or when you are using our website, or participating in research, we seek your consent to the processing of your data as outlined above. We rely on this consent as the lawful basis on which we collect and use your personal data.

mapping for change

Under the <u>UK-General Data Protection Regulation</u> you have a number of important rights free of charge. In summary, those include rights to:

- Right to access: access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- Right to rectification: require us to correct any mistakes in your information which we hold
- Right to erasure: require the erasure of personal information concerning you in certain situations
- Right to restriction of processing: request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Right to data portability: receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Right to object: object at any time to processing of personal information concerning you for direct marketing, object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you



• Right to complain: right to complain to <u>the Information Commissioner's Office</u> (ICO) if you have any grievance against the way we collect, use or share your information.

For further information on each of those rights, including the circumstances in which they apply, see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the UK General Data Protection Regulation.</u>

Under the <u>EU-General Data Protection Regulation</u> you have a number of important rights free of charge. In summary, those include rights to:

- Right to access: access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- Right to rectification: require us to correct any mistakes in your information which we hold
- Right to erasure: require the erasure of personal information concerning you in certain situations
- Right to restriction of processing: request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Right to data portability: receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Right to object: object at any time to processing of personal information concerning you for direct marketing, object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Right to complain: right to complain to the <u>European Data Protection Board</u> if you have any grievance against the way we collect, use or share your information.

For further information on each of those rights, including the circumstances in which they apply, see the <u>Guidance from the EU European Data Protection Board on individuals rights under the EU General Data Protection Regulation</u>.

If you would like to exercise any of those rights, please:

- email (admin@mappingforchange.org.uk), or write to us
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

You can find out if we hold any personal information about you by making a 'subject access request' under the UK Data Protection Act 1998. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.



To prevent and/or minimise the impact of a data breach, the following security measures are in place:

- Periodic checks on whether security measures are being adhered to.
- Employee onboarding process and yearly email reminders on the importance of data protection and implementation of security measures.
- Segmentation of data and only allowing staff, volunteers or consultants access to the information they need to do their job.
- When sending an email to multiple recipients, use blind carbon copy (Bcc).
- Working with well-established trustworthy third-party providers.
- Encrypting of all passwords (which are not managed, stored or accessible by either the Mapping for Change team or any volunteers or consultants).

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination inside the European Economic Area ("EEA"). It may also be processed by staff operating inside the EEA who work for us or for one of our third-party service providers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where you have chosen a password which enables you to access certain parts of our sites, you are responsible for keeping this password confidential. Do not share your password with anyone and do not use a password that you have already used to access other websites or services.

Reporting procedures

If you suspect a potential data breach, the following procedure is in place:

- Notify the Mapping for Change Data Protection Officer. This can be done through email (admin@mappingforchange.org.uk), or other contact channels.
- Directors investigate if the potential breach is real.
- The impact on individuals and organisation is assessed.
- The national body regulating data protection is notified within 72 hours. Only necessary if the breach could result in discrimination, damage to reputation, financial loss, loss of confidentiality, or social-economic disadvantage.
- The individuals concerned are notified if there may be a risk to their rights and freedoms.
- The breach is resolved.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 12th February 2023.



How to contact us

If you want to request information about our privacy policy you can <u>email us</u> or write to:
Mapping for Change CIC
Mildmay Community Centre
Woodville Road
London
N16 8NA

Mapping for Change CIC retention periods

| Mapping for Change CIC - Retention schedule | | | | |
|--|---|---|--|--|
| Source | Time | Action required by you | Our action | Rationale |
| Information collected through Google Analytics | 36 months | none - automatic | None | to enable analysis of website performance |
| Information contributed to community maps | Indefinitely | users can delete their own contribution(s) | Request actioned within 14 days | to enable maps to stay live and useful |
| Media contributed to community maps | Indefinitely | request deletion of media | Request actioned within 14 days | to enable map contributions to be supported with additional material to stay live and useful |
| Information collected on registering to use Community Maps | Indefinitely | request deletion of account | request actioned within 14 days | to enable users to continue to use the maps |
| Information collected when signing up to receive e-news | Indefinitely | request removal from database | request actioned within 14 days | to enable communications to be sent regularly |
| Information collected through citizen science project | 24 months after completion of project | None - unless you require a deletion sooner | request actioned within 14 days | to enable data to be analysed and referenced/verified if necessary |
| Information collected through job application | 6 months | None | Review and delete records every 2 months | Legal reasons |
| Information collected as staff member | 6 years after termination of employment | None | Review and delete records every 6 months | Legal reasons |
| Information collected for Payroll | 3 years after termination of employment | none | Review and delete records every 6 months | Legal reasons |
| Information collected as a volunteer | 2 years after termination | None - unless you require a deletion sooner | Review and delete records every 6 months Data will be | Legal reasons and for references |
| Information collected through financial dealings | 7 years | None | deleted as part of the year-end procedure | Legal reasons |



Information collected through contract/quote enquiry

Review and delete records every 6 months

Business development



