

# **Privacy Notice**

This Privacy Notice explains how we use the personal information that Share and Repair collects or generates both in relation to the Share and Repair website (<a href="https://shareandrepair.org.uk/">https://shareandrepair.org.uk/</a> and Share and Repair workshops and services.

The list below sets out what is covered in this Privacy Notice and you can click on the headings below to go to a specific section.

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# 1. BACKGROUND

- 1.1 Share and Repair registered by that name with the Charities Commission with its registered address at 22 Malvern Buildings Bath BA1 6JX and with charity number 1189015. Share and Repair is responsible for ensuring that it uses Personal Data in compliance with data protection laws, including (but not limited to) the General Data Protection Regulation (EU) 2016/679 ("GDPR") and any other national, implementing or supplementing Data Protection Legislation including but not limited to the Data Protection Act 2018.
- 1.2 At Share and Repair we respect the privacy of our Members and we are committed to keeping all your Personal Data secure. This Privacy Notice governs the handling of Personal Data by Share and Repair in the course of carrying out our activities.
- 1.3 We use the following definitions in this Privacy Notice:

Members means a member of Share and Repair's Bath Library of

Things; an individual who has registered at

bathlibraryofthings.org.uk.

User(s) or You means the users of the Share and Repair Website or

services including Repairs.

Share and Repair

Website

means the platform consisting of the Share and Repair

services and the Share and Repair website

https://shareandrepair.org.uk/.

Share and Repair, we

or us

means Share and Repair.

Personal Data means any data which relates to a living individual who can

be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Share and Repair (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Share and

Repair or any other person in respect of an individual.

**Privacy Notice** means this website privacy notice.

Repairs means in-person repair services provided by Share and

Repair volunteers

**Workshops** means events arranged by Share and Repair and hosted by

third party volunteers from time to time.

# 2. THE PRODUCTS AND SERVICES WE PROVIDE

- 2.1 This Privacy Notice concerns the following information that we collect about you when providing services as part of the Share and Repair Website or Workshops:
  - (A) Information we receive through our website ("Share and Repair Website");
  - (B) Information we receive through our repair cafe ("Repair Cafe");
  - (C) Information we receive through our library of things lending services ("Bath Library of Things").

# 3. THE TYPES OF PERSONAL DATA WE COLLECT

- 3.1 Some of the services offered by Share and Repair require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. Members may be unable to access the Bath Library of Things and/ or Users may not be able to access the Share and Repair Website or Workshops if such Personal Data is not provided. In relation to each of the services described at Section 2.1 above, we will collect and process the following Personal Data about you:
  - Information that you provide to Share and Repair. This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):
    - basic Personal Data (such as first name; family name; email address; phone number; address; city; postcode); and
    - any information that you choose to share on Share and Repair Website, at a Repair Cafe or Workshop, or on the Bath Library of Things which may be considered Personal Data.
  - Information that we collect or generate about you. This includes (by way of a non-exhaustive list):
    - any information regarding the services used on the Bath Library of Things and our interactions with you; and
    - a file with your contact history to be used to track equipment we have leased to you and to record attendance at a Repair Cafe or Workshop.

#### Anonymised data

- In addition to the categories of Personal Data described above, Share and Repair will also process further anonymised information and data that is not processed by reference to a specific individual.

## 4. HOW WE USE YOUR INFORMATION

- 1.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:
  - for ongoing review and improvement of the information provided on Share and Repair Website to ensure they are user friendly;
  - to allow you to use and access the equipment and resources provided by the Bath Library of Things;
  - to set up Members to use the Bath Library of Things;
  - to register attendance at Repair Cafes and/ or Workshops;
  - to record and track progress with your Repair item(s);
  - to contact Members in case an item is overdue or we have a specific reservation request and the item is not available;
  - to record where loaned equipment will be taken to:
  - to contact you regarding outstanding fees; or
  - in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures.
- 1.2 However, when we use Personal Data we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include:
  - we need to do so in order to perform our services with our Users and Members;
  - we have obtained your consent;
  - we need to verify your identity for joining or renewing membership;
  - we have legal and regulatory obligations that we have to discharge;
  - we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
  - the use of your Personal Data as described is necessary for our legitimate business interests, such as:
    - o allowing us to effectively and efficiently manage and administer the operation of the charity; or
    - o maintaining compliance with internal policies and procedures.
- 1.3 We will take steps to ensure that the Personal Data is accessed only by employees and/ or volunteers of Share and Repair that have a need to do so for the purposes described in this Privacy Notice.

# 2. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

- 2.1 We may share your Personal Data outside of Share and Repair for the following purposes:
  - with our Workshop volunteers. For example, this could include our volunteers that run
    the Share and Repair Workshops and whom may require access to the Personal Data
    to check attendance:
  - with third party agents and contractors for the purposes of providing services to us (for example, Share and Repair's third-party payment and communication providers). These

third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Notice; and

 to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend its legal rights.

#### 3. HOW WE SAFEGUARD YOUR INFORMATION

- 3.1 We have controls in place to maintain the security of our information and information systems. User and Member files are protected with safeguards according to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.
- 3.2 As a condition of employment or volunteering, Share and Repair employees and volunteers are required to follow all applicable laws and regulations, including in relation to data protection laws. Access to sensitive Personal Data is limited to those employees and volunteers who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by a Share and Repair employee and/ or volunteer is prohibited and may result in disciplinary measures.
- 3.3 When you contact a Share and Repair employee or volunteer about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

## 4. HOW LONG WE KEEP YOUR PERSONAL DATA

- 4.1 How long we will hold your Personal Data for will vary and will be determined by the following cumulative criteria:
  - the purpose for which we are using it Share and Repair will need to keep your Personal Data for as long as is necessary for that purpose; and
  - legal obligations laws or regulation may set a minimum period for which Share and Repair has to keep your Personal Data.

## 5. YOUR RIGHTS

- In all the above cases in which we collect, use or store your Personal Data, you may have the following rights which you can exercise free of charge. These rights include:
  - the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
  - the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we

have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;

- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to Share and Repair;
- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data, but we are legally entitled to retain it;
- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.
- 5.2 You can exercise your rights by contacting us using the details listed in Section 9 below.
- 4.1 Further information about your rights may be obtained by contacting the Information Commissioner's Office.

#### 6. QUESTIONS AND CONCERNS

4.2 For further information regarding the processing of your Personal Data by Share and Repair, this Privacy Notice, questions relating to consent, or in order to exercise the rights mentioned above, please contact us using the following contact details:

Address: 22 Malvern Buildings Bath BA1 6JX

Email Address: hello@shareandrepair.org.uk

4.3 We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our a Share and Repair representative, you may escalate concerns to the Information Commissioner's Office at <a href="https://www.ico.org.uk">www.ico.org.uk</a> or contact their helpline on 0303 123 1113.