



Privacy Policy

Governing body:

Moseley Road Baths CIO

Date on which this policy was approved by governing body:

13th July 2023

Policy review procedure:

We will review this policy every year to ensure it is in line with national guidelines and standards.

Date at which this policy is due for review:

13th July 2024

Moseley Road Baths CIO Privacy Policy

Effective date: 13th July 2023

We understand that your personal information and privacy is important to you. We make every effort to ensure that the information you share with us is recorded accurately, retained securely and used only according to your wishes. We protect your personal information and adhere to all current data protection act legislation with respect to protecting privacy. We do not give out, sell or trade our mailing list data with external organisations. We comply with the Data Protection Act 1998, the Privacy and Electronic Communications Regulations (PECR) and the UK's General Data Protection Regulations (GDPR) 2018.

Moseley Road Baths CIO (“us”, “we”, or “our”) is the Data Controller and operates the www.moseleyroadbaths.org.uk website (the “Service”). We are a Charitable Incorporated Organisation based at Moseley Road Pools, 497 Moseley Road, Balsall Heath, Birmingham B12 9BX, , Charity number 1176432

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from www.moseleyroadbaths.org.uk

The types of data we collect

We collect a variety of personal and non-personal information for various purposes in order to plan, deliver, support and improve our Service to you.

Personal data

Personal information we collect about you might include:

- your name and title
- postal address, email address and phone numbers
- ticket purchases and attendance
- donor status
- contact preferences
- payment details, where necessary, such as credit/debit card
- details of correspondence sent to you/received by you
- Gift Aid status
- family, spouse, relationships to other donors or volunteers
- current activities and interests
- any other information provided by yourself to Moseley Road Baths CIO, that we feel is relevant to your relationship with us

Cookies and Usage Data

When we ask you to provide your personal information we will let you know why we are asking, and how we will use your data, by directing you towards this notice.

We may also collect information on how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & cookies data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of cookies we use:

- **Session Cookies** - We use Session Cookies to operate our Service.
- **Preference Cookies** - We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies** - We use Security Cookies for security purposes.

Use of data

Most of the personal information we process is provided to us directly by you for one of the following reasons:

Fulfilling your requests

- Purchase of entry tickets
- Provision of information, customer care and support
- E-newsletter sign up
- Register for events
- Volunteer enquiries
- Participation in visitor surveys

Processing and administration of financial transactions

- _____ Processing and administration of sale transactions, donations, or other payments and verifying the transactions

Internal record keeping and monitoring

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- Analysis of valuable information so that we can improve the Service
- Monitor the usage of the Service
- Detect, prevent and address technical issues
- Management of feedback or complaints

Communications and marketing

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful and never excessive.

Depending on your relationship with Moseley Road Baths CIO, data we hold may be used to send you promotional, marketing or fundraising information by post, telephone or electronic means.

These types of communications can include:

- Informing you of charitable activity we deliver related to Moseley Road Baths CIO, such as events, activities, exhibitions, and projects.
- News and updates about Moseley Road Baths CIO
- Information on our fundraising operations, including occasional targeted requests to consider supporting us in various ways.
- Other relevant communications based upon your relationship with Moseley Road Baths CIO

We contact you only in line with the contact preferences you shared with us at the point of giving your information. If you do not wish to receive email communications from Moseley Road CIO, an option to unsubscribe is included in every email communication. If you do not wish to receive postal communications, please let us know by emailing admin@moseleyroadbaths.org.uk or writing to the General Manager, Moseley Road CIO, Moseley Road Pools, 497 Moseley Road, Balsall Heath, Birmingham, B12 9BX.

Fundraising

As a charity reliant on fundraised income, and as part of our major donor fundraising activity, it is in our legitimate interests to occasionally undertake research to gather information about your professional, personal and charitable interests and your likely capacity to support us. This research helps us to understand more about you as an individual so we can focus conversations we have with you about your support in the most effective way, and ensure that we provide you with an experience as a donor or potential donor, which is appropriate to you. It also enables us to use our limited resources as effectively as possible.

Where we do this we use:

- Information we may hold about you on our database (such as a record of events you have attended, conversations or correspondence we have had with you in the past)
- Publicly available information from reputable sources, where you might expect your information to be read by the public. This includes professional profiles (LinkedIn, corporate biographies etc.); resources such as Companies House, the Charity Commission and charity

websites, media coverage and third party publications such as the Sunday Times Rich List.

The lawful basis for processing

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

Consent

Where we have your explicit consent to process your information in that specific situation. You are able to remove your consent at any time. You can do this by contacting xxxxx

Contract Purposes

When you make a purchase from us or make a donation to a specific campaign you are entering into a contract with us. In order to perform this contract, we need to process and store your data. For example, we may need to contact you in case of a change to our opening times, or to resolve problems with your payment, or provide updates on the campaign to which you contributed.

Legitimate Business Interests

Where processing your data is necessary for our legitimate business interests (e.g. promotion of events at Moseley Road Baths CIO, raising funds, providing you with access support during your visit, reporting to funding bodies) and your interests and fundamental rights do not override those interests.

To meet our Legal Obligations

Where we need to comply with a legal or regulatory obligation e.g. providing Gift Aid status to HMRC.

Transfer of data

Your information, including personal data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including personal data, to the United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Moseley Road Baths CIO will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of data

Legal requirements

Moseley Road Baths CIO may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Moseley Road Baths CIO
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Service providers

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

Links to other sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

If you make a request relating to any of the rights listed above, we will consider each request in accordance with the UK General Data Protection Regulations. No administration fee will be charged for considering and/or complying with such a request and a response will be provided within one month of receiving the request. Upon successful verification of your identity you are entitled to obtain the following information about how your personal information is processed:

- The purposes of the collection, processing, use and storage of your personal data
- The source(s) of the personal information, if it was not obtained from you

The categories of personal data stored about you

- The recipients or categories of recipients to whom your personal data has been or may be transmitted along with the location of those recipients

The envisaged period of storage for your personal data

- The use of any automated decision-making and/or profiling.

You can make the above request by emailing admin@moseleyroadbaths.org.uk or by writing to the General Manager, Moseley Road CIO, Moseley Road Pools, 497 Moseley Road, Balsall Heath, Birmingham, B12 9BX.

How to make a complaint

If you have any concerns about our use of your personal information, you can make a complaint to us by contacting the General Manager, Moseley Road Baths CIO, Moseley Road Pools, 497 Moseley Road, Balsall Heath, Birmingham B12 9BX or by emailing admin@moseleyroadbaths.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

<https://ico.org.uk/concerns/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: admin@moseleyroadbaths.org.uk