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| Policy Name | Privacy Policy |
| Policy Number | 29 |
| Date of Issue | January 2025 |
| Policy Author(s) | Andrew Kilpatrick |
| Officer Responsible | Lead Officer |
| Who the Policy Applies To | All staff, volunteers, students on work placements and including trustees of CreateBolton |
| Relevant policies to be read in conjunction with | Data Protection Policy, Confidentiality Policy |
| Date of Approval | January 2025 |
| Date of Review | January 2027 |

It is a requirement that all employees and volunteers familiarise themselves with all policies and procedures which are relevant to their position within CreateBolton



CreateBolton Privacy Policy website version

Who are we?

CreateBolton is committed to protecting and respecting your privacy and security. Whenever you provide us with your personal information via our website “Site(s)”, we will treat that information in accordance with this policy, our terms and conditions and current UK Data Protection legislation.

By using the Site and any services we offer via our Site, you are agreeing to be bound by this policy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. This policy may change from time to time, so please check this page periodically.

CreateBolton is a registered charity (number 1179761). The registered address is Claremont House, St George’s Road, Bolton, BL1 2BY

If you have any questions around this privacy policy, you should contact the Lead Officer on 07964814297

How do we collect information from you?

Information you give to us

This could be as a customer, supplier, business contact, employee, volunteer or contractor of our service, when you donate, access a service or attend an event.

Information we get from your use of the website

When you visit the Site, we collect various personal information which may include your name, address, contact details, IP address, and information



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| | regarding which pages are accessed and when. |
| What type of information is collected about you | <p>The personal information we collect might include:</p> <ul style="list-style-type: none"> ▪ Name, address (including postcode), email address, telephone number, IP address ▪ Date of birth ▪ Emergency contact details <p>Sensitive data which includes but it is not limited to health data, sexuality, ethnicity and religion are recognised by ICO guidance as “special categories” of data only collected if absolutely necessary. Where this information is collected for monitoring purposes, it is done so on a separate form and the individual cannot be identified.</p> |
| How is your information used? | <p>As a customer, supplier, business contact, employee, volunteer, or contractor of our service we may use your information to deliver a service, process a donation that you have made; to capture attendance at an event.</p> <p>Information we get from your use of the website</p> <p>When you visit the website, we collect various personal information which may include your name, address, contact details, IP address, and information regarding which pages are accessed and when</p> |
| Who has access to your information? | <p>We will not sell or rent your information to third parties.</p> <p>We will not share your information with third parties for marketing purposes.</p> <p>It may be necessary to pass your information to a 3rd party in order to process a service (e.g. when you make a donation using JustGiving), but we will</p> |



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| | only share the personal information necessary to deliver the service. |
| Lawful Processing | The GDPR requires us to rely on one or more lawful grounds to process your personal information. The following are the grounds we use are consent, legitimate interest, contract, vital interests |
| Fundraising and Marketing | <p>CreateBolton is subject to certain rules and privacy laws when marketing to our clients/customers.</p> <p>For example, an individual's prior consent is required for electronic direct marketing (for example, by email, text or automated calls). The limited exception for existing customers known as 'soft opt in' allows organisations to send marketing texts or emails if they have obtained contact details in the course of a sale to that person, they are marketing similar products or services, and they gave the person an opportunity to opt out of marketing when first collecting the details and in every subsequent message.</p> <p>The right to object to direct marketing must be explicitly offered to the individual in an intelligible manner so that it is clearly distinguishable from other information.</p> |
| Your Choices | <p>You have the right to opt out of receiving communications from us at any time by contacting us on createbolton@gmail.com</p> <p>You can also change the way we contact you at any time by calling / emailing the Lead Officer on 07964814297 or by emailing createbolton@gmail.com</p> <p>In order to opt you out of receiving communications, it is necessary to retain some of your details to ensure we</p> |



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| | don't contact you again in future. Your details will only be used for this purpose. |
| Your Rights | <p>The GDPR provides the following rights for individuals, which our charity provides to you:</p> <ol style="list-style-type: none">1. The right to be informed2. The right of access <p>You have the right to request to see what information we hold about you, free of charge and within 30 days. If you would like to do this, please contact the Lead Officer on 07964814297</p> <ol style="list-style-type: none">3. The right to rectification4. The right to erasure5. The right to restrict processing6. The right to data portability7. The right to object <p>In collecting and processing your personal information we will comply with the Data Protection law in force at the time. This means that the personal information we hold about you must be:</p> <ol style="list-style-type: none">a) used lawfully, fairly and in a transparent wayb) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with these purposes.c) Relevant to the purposes we have told you about and limited only to those purposesd) Accurate and up to datee) Kept only as long as necessary for the purposes we hold about you |



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| | f) Kept securely |
| Keeping your information safe | When you give us personal information, we take steps to ensure that it's treated securely; we have encryption, secure mail and password protection |
| Use of Cookies | When you visit the website, we collect various personal information which may include your name, address, contact details, IP address, and information regarding which pages are accessed and when. |
| 16 or under | If you are aged 16 or under, please get your parent / guardian's permission beforehand whenever you provide us with personal information. |
| Transferring your information outside of Europe | We do not use any 3 rd parties that transfer data outside the EEA |
| Complaints or Compliments | If you want to make a complaint or compliment, you can do so by contacting the Lead Officer on 07964814297 or by emailing createbolton@gmail.com |
| Review of this Privacy Policy Statement | This policy will next be reviewed in January 2027 and is kept under regular review and updated where necessary |