



PRIVACY POLICY

Document Control	
Reference	LINK033: Privacy Policy
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Purpose/ remit	This document describes the main processes in place within The Link and the organisation's overall approach to ensure compliance with applicable laws and business objectives.
Owner	HR, Information Governance Team
Approval body	CEO, Information Governance Lead
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Applies to	All Staff
Notes	To be read in conjunction with Related Documents detailed below.
Classification	Public

Related Documents	
Reference:	Purpose/remit of policy:
N/A	N/A



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INTRODUCTION

By submitting your information you consent to the use of that information as laid out in this policy.

In accordance with the UK- General Data Protection Regulation (UK-GDPR), we have implemented this privacy policy to inform you of the types of data we process about you. We also include within this policy the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

The Links Data Protection Officer is:

Holly Gibson, The Link, 101 The Greenway, Middlesbrough, TS3 9PA. 01642 505580.
info@redcarlink.com

PRINCIPLES

Under UK-GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- we comply with the relevant UK-GDPR procedures for international transferring of personal data

INFORMATION WE COLLECT AND HOW WE USE IT

In order to carry out our business functions, we may need to know your name, address, e-mail address and various other details. We gather this information to allow us to contact you efficiently and deal with your requirements. The relevant information is then used by us, and our agents to communicate with you.

From time to time we may provide the information that you have provided in e-mailing to us to our customer service agencies for research and analysis purposes so that we can monitor and improve the services we provide.

We may also wish to provide you with information about special features of our website or any other services or products from The Link and our associated companies that we think may be of interest to you. If you would rather not receive this information, please send an email with the words: 'REMOVE ME FROM YOUR MAILING LIST', in the subject box to: info@redcarlink.com

We may also want to provide you with related information from third parties we think may be of interest to you. If you would rather not receive this information, please send an email with



the words: 'REMOVE ME FROM YOUR MAILING LIST', in the subject box to: info@redcarlink.com

We would like to provide your information to carefully selected third parties whose products or services we believe may be of interest to you. If you do not wish us to disclose your information in this way, please send an email with the words: 'REMOVE ME FROM YOUR MAILING LIST', in the subject box to: info@redcarlink.com

Aside from the matters laid out above, your personal data will not be disclosed to any third party save with your consent.

INFORMATION GATHERING TECHNOLOGIES

The Link employs information gathering technologies for the purposes of collecting information and statistics about the users of this site, but such information will not be used to identify any individual. The purpose of gathering such information is to assist us to analyse the use of the website and revise it for the benefit of our customers by making your visit to the site more efficient and to improve and increase the content found to be most popular.

LAWFUL BASIS FOR PROCESSING YOUR INFORMATION

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for The Link to process your information to help us to achieve our mission.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work via post, use your personal information for data analytics, conduct research to better understand who our supporters are, improve our services, for our legal purposes (for example, dealing with complaints and claims).

SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- Health
- sex life
- sexual orientation
- Race
- ethnic origin
- political opinion
- Religion
- trade union membership
- genetic and biometric data.



Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for providing you with a service.

WHO WE SHARE YOUR DATA WITH

Employees within our company will have access to your data which is relevant to their role. All employees with such responsibility have been trained in ensuring data is processed in line with UK-GDPR.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data. We do not share your data with bodies outside of the UK.

HOW WE PROTECT YOUR INFORMATION

The internet is not a secure medium. We have put in place various security measures but you are advised to treat the internet as an insecure medium in all your communications with us. We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

HOW LONG WE HOLD YOUR INFORMATION

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations. Some data retention periods are set by the law, retention periods can vary depending on why we need your data.

SALE OF BUSINESS

If The Link is integrated into any other company or organisation your details may be disclosed to our advisers and any prospective operators and their advisers and will be passed on to the new operators of The Link.

UPDATING YOUR DETAILS

If any of the information that you have provided to The Link changes, for example if you change your address, please let us know the correct details by sending an e-mail with the subject: 'UPDATE MY INFO', to: info@redcarlink.com.

AUTOMATED DECISION MAKING

Automated decision making means making decisions about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you



solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal information, you have the following rights:

- the right to be informed about the data we hold on you and what we do with it;
- the right of access to the data we hold on you.
- the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- the right to have data deleted in certain circumstances. This is also known as 'erasure';
- the right to restrict the processing of the data;
- the right to transfer the data we hold on you to another party. This is also known as 'portability';
- the right to object to the inclusion of any information;
- the right to regulate any automated decision-making and profiling of personal data.

CONSENT

By submitting your information you consent to the use of that information as set out in this policy. If we change our privacy policy we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. We will also email you should you make any changes so that you may consent to our use of your information in that way. Continued use of the service will signify that you agree to any such changes.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

If you require any further information, please contact us at info@redcarlink.com

DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:

- Holly Gibson, The Link, 101 The Greenway, Middlesbrough, TS3 9PA, 01642 505580



Appendix A: Review & Sign-Off Log

Date	Version	Changes	Approval Signature
11.03.24	2.0	Policy reformatted to include document control and sign off log and contents page.	J Leopard (CEO)
25.03.25	3.0	Policy merged with LINK012 to create one overall Privacy Statement	J Leopard (CEO)