

Introduction

This privacy statement* provides details of how we will collect and process your personal data when engaging with **North Star Co-Design CIC**.

By sharing your data, you are providing assurance to us that you are over 18 years of age.

North Star Co-Design is the 'Data Controller' and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

*If you have any questions about this privacy statement, please contact the Data Protection Officer using the details at the bottom of this page.

Information contained on this page complies with the legal requirements for processing personal data as laid out in *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation)*.

The lawful ground for the collection and processing of **North Star Co-Design** participant sensitive data falls under Article 9, *Processing of Special Categories of Personal Data*, Section 2 (a) Explicit consent, (c) Vital interests, (d) Not-for-profit bodies, and (f) Legal claims or judicial acts, of the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation)*.

What data do we collect about you, for what purpose, and on what grounds do we process it?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims.

Our lawful ground for this processing is our legitimate interests which, in this case, are to reply to communications sent to us, to keep records, and to establish, exercise, or defend legal claims.

- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups

of our website and/or databases and to enable publication and administration of our website, other online services and business.

*Our lawful ground for this processing is our legitimate interests which, in this case, are to enable us to properly administer the **North Star Co-Design** website and the overall **North Star Co-Design** project delivery.*

- **Technical Data** that includes data about your use of the **North Star Co-Design** project website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, and to deliver relevant website content.

*Our lawful ground for this processing is our legitimate interests which, in this case, are to enable us to properly administer the **North Star Co-Design** website and overall **North Star Co-Design** project delivery.*

Sensitive Data

If you are applying to become a participant in a **North Star Co-Design** project, we will need to collect sensitive data about you in order for you to be supported fully when participating in the **North Star Co-Design** workshops.

To collect your sensitive data, we require your explicit consent for processing sensitive data (see the introductory section of this page above). Therefore, when you submit your details when formally applying to be a participant on a **North Star Co-Design** project, you will be asked to confirm your consent to this processing. Your personal data will only be used for the purpose it was collected for, or a reasonably compatible purpose if necessary.

We do not carry out automated decision making or any type of automated profiling using sensitive data.

The sensitive data we collect will include:

Your full name, permanent home address, telephone number and email address.

Details of emergency contacts including name, phone number, and relationship to you. Relevant medical and/or allergy details. Consent for medical treatment in the event of an emergency.

Photographs of participants when taking part in **North Star Co-Design** workshops.

Where we are required to collect personal data by law, or under the terms of the contract between us, if you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you, or participation in any of the **North Star Co-Design** project workshops and other

associated activities). If you do not provide us with the requested data, we may have to cancel a product, service, or scheduled activity with us, but if we do, we will notify you at the time.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

How we collect your personal data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using internet cookies and/or similar technologies.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical services such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Marketing Communications

Our lawful ground of processing your personal data to send you direct marketing communications is either your consent or our legitimate interests (namely to support and enhance your participation in a **North Star Co-Design** project).

Disclosures of your personal data

There may be times when we have to share your personal data with the parties set out below:

- Service providers who provide and maintain the **North Star Co-Design** project IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government and funding bodies that require us to report data processing activities.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We do not transfer your personal data outside the European Economic Area.

Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We may allow access to your personal data to **North Star Co-Design** project partners who have a clear business need to know such data. Project partners will only process your personal data on our instructions and they must keep it confidential and secure.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent. You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email the **North Star Co-Design** Data Controller on the details found at the bottom of this page. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We reserve the right to refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We should be grateful if you would contact us in the first instance if you do have a complaint so that we can try to resolve it for you.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Internet Cookies

When you visit a website, it gives your browser a cookie to store in a cookie file that's placed in your browser's folder on your hard drive. The next time you visit the same website, the browser will give back the cookie to identify you. Then the website loads with a personalised experience. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the **North Star Co-Design** website may become inaccessible or not function properly.

Data Privacy Contact Details:

Full name of project entity:

North Star Co-Design

Name of our Data Protection Officer:

Lee Mattinson

Email address: northstarcic@gmail.com

Postal address: Newcastle upon Tyne, UK