

Creative Frame CIC

Information sheet

Privacy Policy

1. General information

This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our services.

We'll tell you:

- why we are able to process your information;
- what purpose we are processing it for;
- whether you have to provide it to us;
- how long we store it for;
- whether there are other recipients of your personal information;
- whether we intend to transfer it to another country; and
- whether we do automated decision-making or profiling.

The first part of the notice is information we need to tell everybody.

Controller's contact details

Creative Frame CIC is the controller for the personal information we process, unless otherwise stated.

There are many ways you can contact us, including by phone and email. More details can be seen here.

Telephone: 07305 237120

For general contact please use the telephone number above or email info@creativeframe.org.uk

Data Protection Officer's contact details

Our Data Protection Officer is [insert staff members name]. You can contact them at [insert DPO's email address] or via our postal address. Please mark the envelope 'Data Protection Officer'.

How do we get information?

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

- You have made an enquiry to us.
- You have made an information request to us.
- You wish to attend, or have attended, an event.
- You subscribe to our e-newsletter.
- You have applied for a job with us.
- You are representing your organisation

We also receive personal information indirectly, in the following scenarios: Where you have made your contact information available on your organisation's website and we use this to contact you and your organisation.

An employee of ours gives your contact details as an emergency contact or a referee.

Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this right here.](#)

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here.](#)

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this right here.](#)

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this right here.](#)

Your right to object to processing

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests. [You can read more about this right here.](#)

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this right here.](#)

If we are processing your information for criminal law enforcement purposes, your rights are slightly different. Please see the relevant section of the notice.

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

Please contact us at info@creativeframe.org.uk if you wish to make a request, or contact us by telephone on 07305237120

Sharing your information

We will not share your information with any third parties for the purposes of direct marketing. We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. For example, under a court order. We might also share information with other regulatory bodies in order to further their, or our, objectives. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

We may also share your information in the event of the non-payment of fees. If the debt remains outstanding after the specified timeframe for payment, no payment plan is in place or an agreed payment plan is not being adhered to, we may initiate formal proceedings to recover the full amount of the unpaid fees. As a result [insert organisation name] will share personal data with the litigation and recovery specialists it instructs in order for them to identify assets and undertake recovery action through the courts.

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at [insert organisations email address] and we'll respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the UK supervisory authority. [Please follow this link to see how to do that.](#)

Changes to this privacy notice

We keep our privacy notice under regular review to make sure it is up to date and accurate.

Visitors to our website

Analytics

When you visit www.creativeframe.org.uk, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not directly identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

Cookies

We use a cookies tool on our website to gain consent for the optional cookies we use. Cookies that are necessary for functionality, security and accessibility are set and are not deleted by the tool.

You can read more about how to change your cookies preferences, [here](#).

2. Reason for contacting us

Making a complaint

Purpose and lawful basis for processing

When you contact us to make a complaint, we collect information, including your personal data, so that we can respond to it and fulfil our regulatory responsibilities.

The lawful basis we rely on to process your personal data is article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary to handle your complaint. If the information you provide us in relation to your enquiry contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(g) of the UK GDPR, which also relates to handling your complaint and the safeguarding of your fundamental rights.

What we need and why we need it

We need enough information from you to answer your complaint. If you call us, we won't make an audio recording of it and we won't usually need to take any personal information from you. But in certain circumstances we may make notes to provide you with a further service as required.

If you contact us via email or post, we'll need a return address for response.

What we do with it

We'll set up a document to record your complaint and so we can get it to the correct area of our business to be dealt with. We'll also keep a record of our response. We use the information supplied to us to deal with the complaint and any subsequent appeals that may arise, and to check on the level of service we provide.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We are acting in our official capacity to respond to your complaint, so you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see 'Your rights as an individual' earlier in this document.

Do we use any data processors?

No

Make an enquiry

Purpose and lawful basis for processing

When you contact us to make an enquiry, we collect information, including your personal data, so that we can respond to it and fulfil our regulatory responsibilities.

The lawful basis we rely on to process your personal data is article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary to handle your enquiry. If the information you provide us in relation to your enquiry contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(g) of the UK GDPR, which also relates to handling your enquiry and the safeguarding of your fundamental rights.

What we need and why we need it

We need enough information from you to answer your enquiry. If you call us, we won't make an audio recording of it and we won't usually need to take any personal information from you. But in certain circumstances we may make notes to provide you with a further service as required. If you contact us via email or post, we'll need a return address for response.

What we do with it

We'll set up a document to record your enquiry and so we can get it to the correct area of our business to be dealt with. We'll also keep a record of our response. We use the information supplied to us to deal with the enquiry and any subsequent issues that may arise, and to check on the level of service we provide.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We are acting in our official capacity to respond to your enquiry, so you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see 'Your rights as an individual' earlier in this document.

Do we use any data processors?

No – In the event that we can't deal with your enquiry but can suggest an alternative source of support we will seek your consent to share your details – for example for telephone enquiries this is likely to be verbal.

Apply for a job with us

Purpose and lawful basis for processing

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA2018 which again relates to processing for employment purposes.

What will we do with the information you give us?

We'll use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We may also contact you to request your feedback about our recruitment process. We'll use the other information you provide to assess your suitability for the role.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it may affect your application if you don't.

We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

Application stage

If you use our online application system, your details will be collected by our data processor Vacancy Filler on our behalf.

You can submit your application to us without the need to create an account.

We ask you for your personal details including name and contact details. We'll also ask you about previous experience, education, referees and for answers to questions relevant to the role. Our recruitment team will have access to all this information.

You will also be asked to provide equal opportunities information. This is not mandatory – if you don't provide it, it won't affect your application. We won't make the information available to any staff outside our recruitment team, including hiring managers, in a way that can identify you. Any information you provide will be used to produce and monitor equal opportunities statistics.

Shortlisting

Our Project manager and a member of the board shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

Assessments

We may ask you to participate in assessment sessions; complete tests or occupational personality profile questionnaires; attend an interview; or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by us.

If you are unsuccessful after assessment for the role, we may ask if you would like your details retained in our talent pool. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We must confirm the identity of our staff and their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity and reliability.

You must therefore provide:

- proof of your identity – you will be asked to attend our office with original documents; we'll take copies
- proof of your qualifications – you will be asked to attend our office with original documents; we'll take copies
- a criminal records declaration to declare any unspent convictions
- your email address, which we'll use to contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We'll contact your referees, using the details you provide in your application, directly to obtain references
- We'll also ask you to complete a questionnaire about your health to establish your fitness to work.

- We'll also ask you about any reasonable adjustments you may require under the Equality Act 2010. This information will be shared with relevant [insert name of your organisation] staff to ensure these are in place for when you start your employment.
- If we make a final offer, we'll also ask you for the following:
 - bank details – to process salary payments
 - emergency contact details – so we know who to contact in case you have an emergency at work

How long is the information kept for?

For information about how long we hold personal data, see our retention schedule.

Your rights

As an individual, you have certain rights regarding your own personal data. For more information on your rights, please see 'Your rights as an individual'.

Do we use any data processors?

No

Attend an event, seminar or workshop or complete a survey

Purpose and lawful basis for processing

Our purpose for collecting this information is so we can facilitate the event and provide you with an acceptable service.

The lawful basis we rely on for processing your personal data is your consent under article 6(1)(a) of the UK GDPR. When we collect any information about dietary or access requirements we also need your consent (under article 9(2)(a)) as this type of information is classed as special category data.

What we need

If you wish to attend one of our events, you will be asked to provide your contact information including your organisation's name and, if offered a place, information about any dietary requirements or access provisions you may need. We may also ask for payment if there is a charge to attend.

Why we need it

We use this information to facilitate the event and provide you with an acceptable service. We also need this information so we can respond to you.

What we do with it

If you are not successful in securing a place, we'll let you know and hold your details on a reserve list in case a place becomes available.

If you are allocated places at an event, we'll ask for information about any dietary/access requirements. We don't share this information in any identifiable way with the venue, and we delete it after the event.

We don't publish delegate lists for events.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We rely on your consent to process the personal data you give us to facilitate the event. This means you have the right to withdraw your consent at any time. If at any point you want to withdraw your consent please email [insert organisation email address] or call us [insert organisation telephone number]

The lawful basis we rely on to process your personal data is article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary to handle your enquiry. If the information you provide us in relation to your enquiry contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(g) of the UK GDPR, which also relates to handling your enquiry and the safeguarding of your fundamental rights.

What we need and why we need it

We need enough information from you to answer your enquiry. If you call us, we won't make an audio recording of it and we won't usually need to take any personal information from you. But in certain circumstances we may make notes to provide you with a further service as required. If you contact us via email or post, we'll need a return address for response.

What we do with it

We'll set up a document to record your enquiry and so we can get it to the correct area of our business to be dealt with. We'll also keep a record of our response. We use the information supplied to us to deal with the enquiry and any subsequent issues that may arise, and to check on the level of service we provide.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We are acting in our official capacity to respond to your enquiry, so you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see 'Your rights as an individual' earlier in this document.

Do we use any data processors?

No – In the event that we can't deal with your enquiry but can suggest an alternative source of support we will seek your consent to share your details – for example for telephone enquiries this is likely to be verbal.

or call us 07305237120. If you do that, we'll update our records immediately to reflect your wishes.

For more information on your rights, please see 'Your rights as an individual'.

Do we use any data processors?

Yes – we use data processors to help facilitate the events. We may sometimes charge a fee to attend an event. If this happens, our communications about the event will provide details of the data processor we use to collect payments.

E.G

Zoom
Eventbrite
Mailchimp

Responding to our consultation requests and surveys

Purpose and lawful basis for processing

If you have indicated that you would be interested in contributing to further Creative Frame CIC work on the subject matter covered by this consultation or survey then we might process your contact details to get in touch with you about your response.

We will process the opinion or views you provide in the responses for the purpose of informing the development of our policy, guidance or other regulatory work in the subject area of the request for views.

The lawful basis we are relying on to process your personal data is article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary for the performance of our organisation.

What we do with it

We'll use the contact information you provide to arrange an interview to obtain your views or contact you to discuss your response.

In the case of consultations, we will publish a summary of the consultation responses and, in some cases, the responses themselves but these will not contain any personal data.

In the case of surveys or feedback, we may want to publish your name and / or job role alongside your response on our website and social media accounts. Where we are considering doing this we will make it clear what we plan to publish and will seek your agreement to this before doing so.

We process the information internally for the above stated purpose. We don't intend to share your personal data with any third party. Any specific requests from a third party for us to share your personal data with them will be dealt with in accordance the provisions of the data protection laws.

How long we keep it

We will retain consultation and survey response information until our work on the subject matter of the consultation is complete.

What are your rights?

You have the right to request access to the personal data that we hold about you. You have the right to object to the processing of your personal data. If you are unhappy with the way in which we have processed your personal data then you have the right to complain to the [ICO](#).

If you wish to exercise any of these rights, please contact info@creativeframe.org.uk or call us on 07305237120

Do we use any data processors?

We do often use third parties to compile reports and to design reports.

Register for a webinar or live broadcast event

Purpose and lawful basis for processing

Our purpose for collecting this information is so we can facilitate the video conference, webinar or live broadcast event and provide wider access to its content.

The lawful basis we rely on to process your personal data is article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary to handle your enquiry. If the information you provide us in relation to your enquiry contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(g) of the UK GDPR, which also relates to handling your enquiry and the safeguarding of your fundamental rights.

What we need

If you are an attendee or presenter at one of these events we will need contact details and an email address from you.

We record some events and all presenters will have their image and audio captured in the recording. If you are an attendee, you may have the option of sharing your image and audio during the session. If you choose to do so, this will also be captured in the recording. Some events will feature a moderated Q&A. If you choose to interact with the Q&A, your comments may be published to others at the event and will also form part of the recording. If an event is being recorded, we will always notify you in advance.

What we do with it

We use your email address to provide you with the event details. This will include information about any recording taking place. For recorded events we will also email you a link to the recording once the event has concluded.

If an event recording will be published, we will always notify you before the event. We don't publish delegate lists for video conferences, webinars or live broadcast events but your name and email address may be visible to others in attendance during the event.

How long we keep it

We will keep your email address and any recording of the event for 12 months. For information about how long we hold personal data, see our retention schedule.

What are your rights?

For more information on your rights, please see 'Your data protection rights'. If you wish to exercise any of these rights, please contact info@creativeframe.org.uk or call us on 07305237120

Do we use any data processors?

We use microsoft teams to deliver our webinar and live broadcast events.

Subscribing to our e-newsletter

Purpose and lawful basis for processing

Our purpose for collecting the information is so we can provide you with a service and let you know about upcoming events.

The lawful basis we rely on for processing your personal data is your consent under article 6(1)(a) of the UK GDPR.

What we need

Your name and email address.

Why we need it

We use your email address to send you our E-newsletter.

What we do with it

We only use your details to provide the service.

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.

You will receive a confirmation email once you have submitted your details and then the newsletters monthly.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We rely on your consent to process the personal data you provide to us for marketing purposes. This means you have the right to withdraw your consent, or to object to the processing of your personal data for this purpose at any time. If at any point you want to withdraw your consent please email [insert organisation email address] or call us [insert organisation telephone number]. If you do that, we'll update our records immediately to reflect your wishes. For more information on your rights, please see 'Your rights as an individual'.

Do we use any data processors?

Yes – we use Mail Chimp to deliver the e newsletter. For more information, please see mailchimp privacy notice.

Request our publications

Purpose and lawful basis for processing

Our purpose for collecting this information is so we can post the requested publications to you. The lawful basis we rely on for processing your personal data is your consent under article 6(1)(a) of the UK GDPR.

What we need

Your name and address details and email address.

Why we need it

So that we can send you the publications you have requested physically and/or electronically.

What we do with it

We only use the contact details to provide this service. We run statistical reports on the types and quantities of publications requested for monitoring purposes, but this does not contain any personally identifiable information.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We rely on your consent to process the personal data you give us to provide this service. This means you have the right to withdraw your consent at any time. If you do that, we'll update our records immediately to reflect your wishes.

If at any point you want to withdraw your consent please email [insert organisation email address] or call us [insert organisation telephone number]. If you do that, we'll update our records immediately to reflect your wishes.

For more information on your rights, please see 'Your rights as an individual'.

Do we use any data processors

No

Make an information request

Purpose and lawful basis for processing

Our purpose for processing your personal data is so we can fulfil your information request to us.

The lawful basis for this is article 6(1)(C) of the UK GDPR, which relates to processing necessary to comply with a legal obligation to which we are subject.

If any of the information you provide us in relation to information request contains special category data, such as health, religious or ethnic information the lawful basis we rely on to process it is article 9(2)(g) of the UK GDPR, which also relates to our public task and the safeguarding of your fundamental rights. And Schedule 1 part 2(6) of the DPA2018 which relates to statutory and government purposes.

What we need and

We need information from you to respond to you and to locate the information you are looking for.

Why we need it

This enables us to comply with our legal obligations under the legislation we are subject to:

- General Data Protection Regulation (2016)
- Data Protection Act (2018)
- Freedom of Information Act (2000)
- Environmental Information Regulations (2004)
- Re-use of Public Sector Information Regulations

What we do with it

When we receive a request from you, we'll set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We'll also store on this case file a copy of the information that falls within the scope of your request.

If you are making a request about your personal data, or are acting on behalf of someone making such a request, then we'll ask for information to satisfy us of your identity. If it's

relevant, we'll also ask for information to show you have authority to act on someone else's behalf.

We'll use the information supplied to us to process your information request and check on the level of service we provide.

If the request is about information we have received from another organisation – regarding a complaint, for example – we'll routinely consult the organisation/s concerned to seek their view on disclosure of the material.

We compile and publish statistics showing information such as the number of requests we receive, but not in a form that identifies anyone.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

For more information on your rights, please see 'Your rights as an individual'.

Do we use any data processors?

No

3. Communicate with us as a business

We hold the names and contact details of individuals acting in their capacity as representatives of their organisations, across the business. The lawful basis is article 6(1)(e) of the UK GDPR. If the interactions relate to suppliers, contracts, buildings management, IT services etc., the legal basis is article 6(1)(c) of the UK GDPR for any legal obligation or article 6(1)(f) because the processing is within our legitimate interests as a business.

Further Information

E-mail: info@creativeframe.org.uk

Website: www.creativeframe.org.uk

Information Commissioners Office

Helpline 0303 123 1113

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

Community Matters, Clayton Works Business Centre
Midland Rd, Leeds, LS10 2BJ
Charity no: 1177705

T 0113 4504866

E admin@community-matters.org.uk



Reasonable efforts are made to keep our advice and information up to date and correct,
but no responsibility for its accuracy and correctness, or for any consequences of relying on it,
are assumed by Community Matters or any associated organisation or brand.