



## **General Privacy Notice**

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## 1. Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of volunteers may contain personnel ID numbers rather than names but if you use a list a separate list of the ID numbers which give the corresponding names to identify the volunteers in the first list then the first list will also be treated as personal data).

Within the United Kingdom, the processing of personal data is governed and legislated by the Data Protection Act (DPA) 2018 and the applied General Data Protection Regulation (GDPR) but also legislation such as the Human Rights Act will apply. The Station will comply with data protection law.

## 2. Who are we?

Radio Wimborne Ltd is not required to be a registered ‘data controller’ under the Data Protection Act due to the limited nature of data we collect and how we use it, together with the ‘not for profit’ status of the company. However, we still treat your data in accordance with legislation as though we were.

Radio Wimborne Ltd is a volunteer led and managed community radio station.

The Station works together with:

- Other organisations that may be registered ‘data controllers’, such as local authorities;
- Community groups;
- Charities ;
- Other not for profit entities.

We may need to share your personal data such as name and contact details with them if they are working with our volunteers or guests on particular shows and/or community events. If we and the other organisations listed above are processing your data jointly for the same purposes, then the Station and the other data controllers may be “joint data controllers” which means we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data the Station processes and for what purposes is set out in this Privacy Policy.

### 3. The Station will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by the Station, or where you provide them to us, we may process information such as gender, age, nationality, education/work history, academic/professional qualifications, hobbies and family composition;
- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.

### 4. How we use sensitive personal data

- We may process sensitive personal data including, as appropriate:
  - information about your physical or mental health or condition in order to monitor sick leave and take decisions on your fitness to volunteer;
  - your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
  - in order to comply with legal requirements and obligations to third parties.
- These types of data are described in the GDPR as “Special categories of data” and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.
- We may process special categories of personal data in the following circumstances:
  - In limited circumstances, with your explicit written consent.
  - Where we need to carry out our legal obligations.
  - Where it is needed in the public interest.
- Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

### 5. Do we need your consent to process your sensitive personal data?

In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## 6. The Station will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

## 7. We use your personal data for some or all of the following purposes:

- To promote shows/content and events;
- To contact you by post, email, telephone or using social media (e.g., Facebook, Twitter, WhatsApp);
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and personnel,;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;
- To process relevant financial transactions including expenses payments where these have been agreed in advance.
- To allow the statistical analysis of data so we can plan the provision of services.

### 7.1 Video Monitoring

The Station is run as a 'self-operated' studio. This means that there may just be the presenter of a show in the building i.e. not technical, admin support or managerial back up. For this reason, a Webcam is operational to allow remote access to the studio by the Technical Team.

This footage is not recorded and is not accessible outside of a 'live feed'. The Live feed can help the volunteer technician avoid lengthy trips to the studio in the event of a technical issue with equipment, it can also avoid interruptions to any work that

presenters are doing in the studio i.e. by not remotely 'logging in' to the PCs when someone else is using them.

In the event of concern for welfare i.e. not being able to contact a lone presenter when they are expected to be in the studio, the webcam may be accessed to ascertain the present position.

Other than the last example, if the webcam is accessed by the technician and it is obvious that there is reasonable activity occurring at an unexpected time, the technician will immediately 'log off' and will not continue to observe.

## 8. What is the legal basis for processing your personal data?

This Privacy Notice sets out your rights and the Stations obligations to you.

We may process personal data if it is necessary for the performance of a contract with you (the Presenters Code of Conduct), or to take steps to enter into a contract.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use. Examples of this would be, if we wanted to use your name or image for marketing and/or promotional reasons.

## 9. Sharing your personal data

This section provides information about the third parties with whom the Station may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading "Other data controllers the Station works with";
- Our suppliers, contractors, accountants. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf;
- On occasion, other local authorities or 'not for profit' bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.
- With your permission, we will also publish your name and image on our website and social media to promote our shows and events.

## 10. How long do we keep your personal data?

We will hold personal data relating to 'guests' that appear on shows or work with the Station in relation to community events for 2 years in case of the desire or need to contact them about their past participation or to make an approach about further participation.

We hold data on volunteers until 2 years post leaving the station (in case of any complaints arising after leaving the Station and/or in case of wanting to re-join).

## 11. Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

### **1. The right to access personal data we hold on you**

- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request, we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

### **2. The right to correct and update the personal data we hold on you**

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

### **3. The right to have your personal data erased**

- If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
- When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

### **4. The right to object to processing of your personal data or to restrict it to certain purposes only**

- You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

### **5. The right to data portability**

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

### **6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**

- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

### **7. The right to lodge a complaint with the Information Commissioner's Office.**

- You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information

Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## 12. Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. [Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas].

## 13. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## 14. Changes to this Policy

We keep this Privacy Policy under regular review. This Policy was last updated in November 2019.

## 15. Website Cookies

Cookies are used to tailor your experience on our website for the following: When entering competitions, receiving location specific content and listening preferences. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. For more information about cookies and how they are used please read our cookie policy.

## 16. Contact Details

Please contact us if you have any questions about this privacy policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller  
Radio Wimborne  
Allenview Hub  
Allenview Car Park  
Wimborne Minster  
Dorset  
BH21 1AX

Phone: 01202 881655

Email: [info@radiowimborne.co.uk](mailto:info@radiowimborne.co.uk)

## Document Version Control

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