

Purpose of this Privacy Notice

This Privacy Notice serves to meet the obligations of your right to be informed under the UK General Data Protection Regulation (UKGDPR) which requires that data controllers provide data subjects with privacy information.

Positive Futures is a data controller meaning the organisation determines the purposes and means of processing personal data held about you. A data subject is an identifiable and living individual to whom personal data relates.

Processing personal information involves obtaining, recording, holding or carrying out any operation or set of operations including:

- organisation, adaptation or alteration
- retrieval, consultation or use
- disclosure by transmission, dissemination or otherwise making available
- alignment, combination, blocking, erasure or destruction.

The categories of personal data obtained

Personal data is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier e.g. name, identification number, location data or online identifier. Positive Futures processes the following personal data about you:

- Name
- Email address
- IP address.

Positive Futures will not process any special category data about you.

The source of the personal data, details of whether you are under a statutory or contractual obligation to provide the personal data and the retention periods for the personal data

We obtain this data when you visit our website and if you complete and submit the Contact Us form.¹

We will hold records that contain your data for no longer than is necessary, as per the retention periods specified in our Records Retention and Disposal Schedule (RRDS).

Purposes of processing

¹ You are not under any statutory or contractual obligation to provide us with your personal data.



We process your data so that we can analyse and report on visitors to our website and so we are able to respond to the request you have made through the Contact Us form, where applicable.

Lawful basis for processing and the legitimate interests for the processing

Positive Futures process your personal data because we have a legitimate interest in analysing and reporting on visitors to our website and responding to requests made using the Contact Us form.

The rights available to individuals in respect of the processing

Depending on the purpose and legal basis for processing your data you will have different rights. Under the UKGDPR, some of your rights are 'qualified' meaning there may be circumstances where some of your rights do not apply.

- You may have the right of access to your data. You can do so by submitting a Subject Access Request Form (available from the Service Manager – details below)
- You may have the right to have your data erased
- You may have the right to have the processing of your data restricted
- You may have the right to have your data rectified if it is incorrect or completed if it is incomplete
- You may have the right to data portability meaning you may obtain and reuse the data we hold about you for your own purposes across different services
- You may have the right to object to your data being processed.

The recipients or categories of recipients of the personal data

Your personal data is shared internally on a need-to-know basis.

Positive Futures use data processors who are responsible for processing your data on our behalf such as web analytic services.

The details of transfers of the personal data to any third countries or international organisations

Your data is not transferred to any third countries or international organisations.

The details of the existence of automated decision-making, including profiling



We do not process your data for the purposes of automated decision-making, including profiling.

The name and contact details of our organisation / representative / data protection officer

For further information, contact the Information Manager at:

- Positive Futures, 2b Park Drive, Bangor, BT20 4JZ
- 028 9147 5720
- <u>dataprotection@positive-futures.net</u>
- <u>https://www.positive-futures.net/contact-us</u>

The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you are concerned about Positive Futures' information rights practices. Visit https://ico.org.uk/concerns/ for further information or call their helpline on 0303 123 1113.