## **Green Impact Privacy Policy**

#### Introduction

Thanks for following our link to find out more about what we are doing to look after your personal information. Green Impact is a project delivered by Students Organising for Sustainability UK (SOS-UK).

We know that when you pass your personal details to us, you are trusting us to keep them safe, and we will do everything within our power to do this. We operate in accordance with the General Data Protection Regulations (GDPR).

We want you to feel confident knowing that when you pass your details on to us they will be safe and protected. If we have not made anything crystal clear, or you would like to know anything else, just get in touch using the details at the end of this document, we will be happy to answer any questions you may have.

This document explains how SOS-UK collects and uses information that we may hold about you as an individual taking part in the Green Impact programme.

## **Privacy principles**

SOS-UK takes privacy seriously. The following principles underpin our approach to respecting your privacy:

- We value the trust that you place in us by giving us your personal information. We will always use your personal information in a way that is fair and worthy of that trust.
- We will provide clear information about how we use your personal information. We shall always be transparent with you about what information we collect, what we do with it, with whom we share it and who you should contact if you have any concerns.
- We will take all reasonable steps to protect your information from misuse and keep it secure.
- We will comply with all applicable data protection laws and regulations and we will
  co-operate with data protection authorities. In the absence of data protection
  legislation, we will act in accordance with generally accepted principles governing
  data protection.

### What is personal information?

Personal information is any information that tells us something about you or could uniquely identify you. This could include information such as your name, contact details or date of birth.

#### What information do we collect?

#### Personal information

We only collect personal information about you **that you give us directly**, e.g. when you sign up to the Green Impact toolkit, use the Green Impact website, provide your details during sign-up to an event, taking part in a survey and when you sign up to receive information (e.g. newsletter). Whenever you give us data, we'll tell you how we'll use your

information - this means they'll be information on sign-up sheets, or in the introduction to online surveys.

The following data is collected through the Green Impact online toolkit at different points during the Green Impact programme. To ensure successful delivery of the programme at your organisation, it is essential to sign up online and provide this information. As Green Impact is a voluntary programme, you can always **choose not to sign up** and get in touch with your local Green Impact delivery team to find out alternative options.

# During registration:

- Required (all users): first name, last name, email address, location/building, password, team name, work telephone number
- Required (if organisation wants to collate more information): location of Green Impact team, number of people on team, number of people working on area covered by team, department covered by team
- Optional (all users): work telephone number, preferred language

## Throughout the programme:

- When uploading evidence or making a comment, we collect information about your team's activities
- For every action, you have the option to upload evidence to show how you've implemented the action. Evidence could include, but is not limited to, photos, minutes of team meetings, posters or comments. You choose yourself what evidence you want to upload. Please do not upload any information which may contain personal data. You can instead choose to show this to your auditor during the audit process.

How do we use your information? We may use your information for the following purposes:

- Send you a Green Impact welcome email to inform you about your successful registration or toolkit submission.
- Send you newsletters or updates about the Green Impact programme either directly or through the Lead Contact for Green Impact at your host organisation.
- Contact you to ask for updates about your progress with the Green Impact programme - either directly or through the Lead Contact for Green Impact at your host organisation.
- To carry out research on the reach and impact of the Green Impact programme so
  we can celebrate this and improve our services your personal data is not used as
  part of this process but we measure how many people are involved, across what
  organisations etc.
- If we want to use any of the evidence you uploaded to the online toolkit, such as photos or documents, for communication purposes and best practice examples, we'll always get in touch with you before using such information to ask for your permission. To get in touch with you, we'll use your contact details provided.

• To update you on any changes to our privacy policy.

You can opt out of receiving communications from us at any time. Any recurring communications (e.g. newsletters) that we send to you will provide the information and means necessary to opt out.

We keep this privacy notice up to date, so if there are any changes to the way in which your personal information is used this privacy notice will be updated and we will notify you of the changes either directly or through your organisation's local delivery Green Impact team.

What is the legal basis that permits us to use this information? Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so as set out in the data protection legislation. The legal basis that permits us to use your information depends on the basis that we are using that information for. We rely on the following legal bases to use your information:

- Where we need information to perform the contract, we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

How do we share your information? We share your personal information in the following ways:

- If your organisation runs the programme through one of our partner organisations (e.g. SOS-International, ACTS), we will make your personal information available to them to ensure the successful delivery of the programme at your organisation. The partner organisation may use the information in the same way as SOS-UK, as laid out in this privacy policy.
- We will share your data with your designated Lead Contact for Green Impact at your host organisation, to enable them to contact you about the programme and support you through it.
- We make your personal contact details available to your local Green Impact delivery team at your organisation, so that they can communicate with you as a programme participant. For example, you may get invites to upcoming Green Impact-related events such as launches, training events, audits and awards ceremony.
- Where we use third party services providers who process personal information on our behalf in order to provide services to us. This includes IT systems providers and IT contractors.

To deliver the Green Impact toolkit we work with:

- Arrk as our software developer (Arrk Limited, 196 Deansgate, Manchester, M3 3WF).
- Handshake Productions as our server manager (Handshake Productions C.I.376 Newport Road, Cardiff CF23 9AE)
- National Union of Students (NUS) retain a copy of the database on the NUS secure server for reporting purposes (Ian King House, Snape Road, Macclesfield, Cheshire, SK10 2NZ)
- We will share your personal information with regulators where we are required to do so to comply with our regulatory obligations.
- We will share your personal information with third parties where we are required to do so by law.
- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy notice.

Where we share your personal information with third parties we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that it is solely used for legitimate purposes in line with this privacy notice.

How do we keep your information secure? Error! Reference source not found. We take all reasonable precautions to keep your personal information secure and require any third parties that handle or process your personal information for us to do the same. Access to your personal information is restricted to prevent unauthorised access, modification or misuse and is only permitted among our employees and agents on a need-to-know basis.

Through the toolkit we will ensure your information is secure and protect access to data and systems.

Security measures of SOS-UK' server which hosts the Green Impact toolkit and its databases:

- Network and client Firewall security, virus checking and Malware updates and storage device control
- File/Folder Access controls to lockdown and secure access to data
- Secure Access controls to servers and databases
- Strong password Policy controls to device and systems
- Regular client, server and application level patching and security updates
- Regular Server, Database, Application and File/Folder Level Back-ups
- Secure removal before disposing of old computers and storage devices
- Systems Auditing and Monitoring and reporting controls
- Annual Systems Security Penetrate testing
- Secure and encrypted client access to SOS-UK systems
- One-way encryption and password protection
- https connection with SSL A report

When do we transfer your information oversees? Green Impact is now delivered in a variety of different international regions. We have protections within the toolkit software that prevent any administrators from licensee partners in other world regions from accessing your data.

Therefore, you can be sure that your data will only be seen by SOS-UK UK, owners of Green Impact, and the managing organisation for your international region:

- To deliver Green Impact in the Netherlands, France and Belgium, we've partnered with SOS-International.
- To deliver Green Impact in Australia, we've partnered with ACTS.

For how long do we keep your information? We keep your personal information only for as long as we need it to ensure the successful delivery of the programme at your organisation.

Your profile data (name, email, telephone number, team, location) will be deleted automatically two years after inactivity (i.e. if you do not login within a period of two years).

You can get in touch with the local Green Impact delivery team at your organisation to request deletion of your account at any time.

Your rights in relation to your information. You have a number of rights in relation to your personal information, these include the right to:

- be informed about how we use your personal information
- obtain access to your personal information that we hold
- request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- request that we erase your personal information in the following circumstances:
  - o if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected
  - o if you no longer want to participate, and want us to remove your data
  - if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing
  - o if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
  - if it is necessary to delete the personal data to comply with a legal obligation
- ask us to restrict our data processing activities where you consider that:
  - o personal information is inaccurate
  - o our processing of your personal information is unlawful
  - where we no longer need the personal information, but you require us to keep it to enable you to establish, exercise or defend a legal claim
  - o where you have raised an objection to our use of your personal information

- request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information;
- object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information;
- not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact <a href="hello@sos-uk.org">hello@sos-uk.org</a>.

### Error! Reference source not found. Contact details

Our contact details are as follows:

Address: C/O NUS, Ian King House, Snape Road, Macclesfield, Cheshire, SK10 2NZ

Telephone: 0300 303 8602

We have appointed a person with responsibility for data protection matters who has responsibility for advising us on our data protection obligations. You can contact this person officer using the following details: hello@sos-uk.org.

If you have any complaints about the way we use your personal information please contact <a href="hello@sos-uk.org">hello@sos-uk.org</a> who will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK).