

Be Confident Group Information and Data Protection Policy

The Data Protection Act 2003 requires every data controller who is processing personal data to notify unless they are exempt. Failure to notify is a criminal offence.

Cycle Confident re registered with the Information Commissioners Office.
<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>
The person responsible for ensuring information security is David Showell, Managing Director of Cycle Confident Ltd.

Any information requests or queries relating to information stored or data collected can be made to Cycle Confident via email: data@cycleconfident.com or via post to:
Data Controller, LG04, Lincoln House, 1 -3 Brixton Road, London, SW9 6DE.

Be Confident Group Adhere to the Eight Data Protection Principles

Whenever collecting information about people Be Confident Group Ltd agrees to apply the Eight Data Protection Principles:

1. Personal data shall be processed fairly and lawfully and in line with the conditions set out in Schedules 2 and 3 to the Data Protection Act.

In practice this means Be Confident Group have procedures in place and the appropriate functionality through CCOMS (Cycle Confident Online Management System) that ensures we:

- Have legitimate grounds for collecting and using the personal data we collect;
- Do not use the data in ways that have unjustified adverse effects on the individuals concerned;
- Are transparent about how we intend to use the data collected, and give individuals appropriate privacy notices when collecting their personal data;
- Handle people's personal data only in ways they would reasonably expect;

and

- Make sure we do not do anything unlawful with the data.

2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

In practice this means Be Confident Group have procedures in place and the appropriate functionality through CCOMS that ensures we

- Are clear from the outset about why we are collecting personal data and what we intend to do with it;
- Comply with the Act's fair processing requirements – including the duty to give privacy notices to individuals when collecting their personal data;
- Comply with what the Act says about notifying the Information Commissioner; and
- Ensure that if we wish to use or disclose the personal data for any purpose that is additional to or different from the originally specified purpose, the new use or disclosure is fair.

3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

In practice this means Be Confident Group have procedures in place and the appropriate functionality through CCOMS that ensures we

- Only hold personal data about an individual that is sufficient for the purpose we are holding it for in relation to that individual; and
- We do not hold more information than we need for that purpose.

4. Personal data shall be accurate and, where necessary, kept up to date.

Although this principle sounds straightforward, the law recognises that it may not be practical to double-check the accuracy of every item of personal data we receive. So the Act makes special provision about the accuracy of information that individuals provide about themselves, or that is obtained from third parties.

To comply with these provisions Be Confident Group:

- Take reasonable steps at the source of data collection to ensure the accuracy of any personal data we obtain;
- Ensure that the source of any personal data is clear;
- Carefully consider any challenges to the accuracy of information; and consider whether it is necessary to update the information.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

In practice this means Be Confident Group:

- Continually review the length of time we keep personal data and ensure it is in sync with both the Act and our contractual requirements.
- Consider the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it;
- Securely delete information that is no longer needed for this purpose or these purposes; and
- Update, archive or securely delete information if it goes out of date.

6. Personal data shall be processed in accordance with the rights of data subjects under this Act.

There are sixth data protection principles which Be Confident Group adhere to through our processes and procedures that ensure the rights of individuals from whom we collect our data are met. The rights of each individual are:

- a right of access to a copy of the information comprised in their personal data;
- a right to object to processing that is likely to cause or is causing damage or distress;
- a right to prevent processing for direct marketing;
- a right to object to decisions being taken by automated means;
- a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to claim compensation for damages caused by a breach of the Act.

7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Be Confident Group have invested in the appropriate security to prevent the personal data we hold being accidentally or deliberately compromised. In particular, we:

- have designed and organised our security to fit the nature of the personal data we hold and the harm that may result from a security breach;
- are clear about who in our organisation is responsible for ensuring information security; David Showell – Managing Director.
- are sure we have the right physical and technical security, backed up by robust policies and procedures and reliable, well-trained staff; and
- are ready to respond to any breach of security swiftly and effectively.

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Often other principles of the Act will also usually be relevant to sending personal data overseas. For example, the first principle (relating to fair and lawful processing) will in most cases require us to inform individuals about disclosures of their personal data to third parties overseas.

There are also situations where the eighth principle does not apply.

Should Be Confident Group Ltd receive a request to transfer data outside of the European Economic Area we would follow the guidelines made available on the Information Commissioners office website.

Be Confident Group Principles and Practices:

- Be Confident Group Ltd ensure individuals are told the reason information is being collected and also provide any further details necessary. We ensure we have an individuals consent before collecting any data.
- We think in advance about what we wish to do with personal data – ie – if we get names and addresses for a specific campaign we only use that information for that campaign.
- Individuals have a right to see what data is being kept on them, and for what purpose, Be Confident Group supply this within 40 days (or sooner) in line with the Act.
- If we buy in a mailing list we cannot use it for any other purpose than the original Data Controller specified.

Working from home

- Be Confident Group Ltd keeps a note of which staff take work home with them.
- If working on something at home and at work both sets of information are kept

up to date using our cloud based file syncing system.

- Home computers should have records removed once project/work records no longer needed at home.
- Staff agree to keep work taken home secure, to return all work related material upon the completion /termination of their contract;
- Be Confident Group are to be informed if information may have got into wrong hands so we can act in accordance with Principle 7 of the Act.

Security Statement

Be Confident Group Ltd has taken measures to guard against unauthorised or unlawful processing of personal data and against accidental loss, destruction or damage.

This includes:

- Adopting an information security policy (this document is our policy)
- Taking steps to control physical security (projects and staff records are all kept in a locked filing cabinet)
- Putting in place controls on access to information (***password protection on files and server access***)
- Establishing a business continuity/disaster recovery plan (Be Confident Group Ltd takes regular back-ups of its computer data files and this is stored away from the office at a safe location)
- Training all staff on security systems and procedures
- Detecting and investigating breaches of security should they occur

Business privacy policy

Privacy policy

Be Confident Group Ltd privacy policy indicates what data we collect from individuals who interact with us, what we do with this information and the security measures that are in place to ensure that personal data is safe.

Be Confident Group Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Be Confident Group Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 9th May 2018.

What we collect We may collect the following information:

We may collect and retain the following information:

- Name
- Contact information including email addresses and phone numbers
- Address
- Preferences and interests such as bike ownership or level of cycling participation
- Age
- Gender
- Employment status
- Employer details
- Ethnicity
- Follow up preferences
- Driving licence details or other proof of identity

We are often required to collect and retain this information by funding bodies.

What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping - If for example someone books on a course we use collected contact details to send reminders via email or SMS
- We may periodically send promotional emails about new services; special offers or other information which we think might be of interest
- From time to time, we may also use this information to contact people for market research purposes. This could be via email, phone or post
- We may use the information to customise our website browsing experience according to declared interests or preferences
- We may pass information on to funding partners for evaluation purposes
- We may pass information on to awarding or qualification bodies

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs.

We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at contact@cycleconfident.com

Individuals have the right to have their personal data erased if:

- the personal data is no longer necessary for the purpose which you originally collected or processed it for;
- we are relying on consent as your lawful basis for holding the data, and the individual withdraws their consent;
- we are relying on legitimate interests as our basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing;
- we are processing the personal data for direct marketing purposes and the individual objects to that processing;
- we have processed the personal data unlawfully (ie in breach of the lawfulness requirement of the 1st principle);
- we have to do it to comply with a legal obligation; or
- we have processed the personal data to offer information society services to a child.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen. You may request details of personal information which we hold about you. If you would like a copy of the information held on you please write to Cycle Confident, Lincoln House, LG.04, 1-3 Brixton Lane, London, SW9 6DE.

Policy Agreed and signed



David Showell Director

Date: Dec 2018

Review Date: Dec 2019