



The Cotswold Posy Patch (CPP) Privacy Policy

Whose Data We Hold:

This policy states how CPP will endeavour to treat the personal data of:

- **Clients** – The people who engage CPP to provide a service.
- **Staff (including ex-staff)** – People who help with the operations of CPP and delivery of its services whether in a paid freelance capacity or as an unpaid volunteer. For the purposes of this policy this also includes ex-staff. *Note: ex-staff are still entitled to have their data protected as if they were still engaged in the business.*

What Data We Hold:

- **Clients** – The information necessary to deliver the service in question. This includes items such as; names, email addresses, phone numbers, delivery addresses – this is all provided with consent as part of the service delivery process.
 - *Credit Card Note: For certain services, clients will need to enter credit/debit card details into our website. These details are not handled by CPP directly (i.e. CPP is not able to read/see the credit card details). These card payments are handled by external providers such as Eventbrite, WooCommerce, etc. - who we believe to be GDPR compliant and reasonably secure.*
- **Staff** – The information necessary to undertake day-to-day tasks and organisation. This includes; names, emails, phone numbers, addresses, photos – all provided with consent as part of 'signing up' to work.
- **Visitor Videos/Photos** – contains images/videos of workshop and flower club attendees engaged in flower arranging activities. These will be held in a CPP-only access controlled storage location. Any publication will be after obtaining consent from the participants.

Where Data Is Stored/Transferred:

Data is stored within standard commercial; email systems, social media, mailing list managers, websites/hosting and other such services. All data is transferred within storage areas allocated and private to CPP, and not shared externally to CPP, unless; (1) with the consent of the data subject, (2) necessary in order to deliver the service in question.

In general, no personal data can be shared outside CPP without prior permission from the data subject. Data will be deleted up to 2 years after the last interaction with the subject.

Subject Access Request

If you wish to make a Subject Access Request, to view, modify or remove your data from CPP assets (or have any queries/concerns) please contact us via the following stating the request and any relevant details that may help us in processing it.

Email: liz @ cotswoldposypatch.com

Postal: The Cotswold Posy Patch c/o Primrose Vale Farm Shop, Shurdington Rd, Bentham, Glos. GL51 4UA

Phone: 07841126495

Your Subject Rights – at a glance:

Aspect	Subject Contact List
Collection of Data - The collection and use of your personal data	Basic contact details (name, email, phone) are used to communicate with subjects and inform them about relevant events and services. They are collected via web forms, paper forms and email.
Access – How to access your personal data and supplementary information	Send a request to the SAR contact details
Rectification – How to have inaccurate personal data rectified, or completed if it is incomplete	Send a request to the SAR contact details
Erasure – How to request erasure of your contact details	Send a request to the SAR contact details – or for the MailChimp email list click 'unsubscribe' or 'remove from list' or similar
Processing – How processing is restricted	We only email subjects with relevant CPP information. We do not pass on personal information to any other party unless essential for the delivery of the service the subject has asked for – this will always be done with the subject's prior consent.
Data Portability – How you to obtain and reuse your personal data for your own purposes across different services	Send a request to the SAR contact details for a copy of your data
Object – How to object to processing in certain circumstances	Send a request to the SAR contact details
Automated Decision Making	There is no automated decision making made as part of our business (see MailChimp's privacy policy in case they do any)
Withdraw Consent – How to withdraw consent (at any time)	Send a request to the SAR contact details
Complaints – How to complain	Send any complaints/concerns to the SAR contact details. If this fails see the UK Information Commissioner's complaints escalation process