



## Privacy & Cookies Policy of Kinetika Bloco

This Privacy and Cookies Policy sets out how we will look after your personal information. We are committed to protecting your personal information and being transparent about what information we hold about you.

The policy covers personal information of our staff, freelance workers [or practitioners], board members, Bloco members [or other recipient of our services], parents, friends or supporters, alumni and website visitors.

We may provide additional privacy notices on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. The policy supplements the other notices and is not intended to override them.

This policy may change from time to time so please check it periodically. It was last updated on 24 May 2018.

### **This policy covers:**

- 1) Who we are and how to contact us
- 2) Personal information we collect about you
- 3) How we use your personal information
- 4) Marketing and Information you provide to others
- 5) How long we keep your personal information
- 6) How we protect your personal information
- 7) Disclosing your personal information to others
- 8) International data transfer
- 9) Your legal rights
- 10) Questions and complaints
- 11) Website
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### **1) Who we are and contacting us**

Kinetika Bloco Ltd is responsible for holding your personal information. We are a registered charity:1139623 and a registered company in England and Wales under company number 07286111. We are the data controller of the personal information which we hold about you for the purposes of the General Data Protection Regulation.

If you want to know what personal information we hold about you or if you have any questions about this policy, please contact our data privacy manager, Tamzyn French, using the following contact details:

e mail: [tamzyn@kinetikabloco.co.uk](mailto:tamzyn@kinetikabloco.co.uk);

Tel: 0207 9604232 (Tuesday, Wednesday and Friday); or

In writing to our registered office  
Spirit Level Office  
Royal Festival Hall  
Belvedere Road, London, SE1 8XX.

## **2) Personal Information we collect about you**

Personal information (or personal data), means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous data).

The type of personal information we will collect, will depend on your relationship with us. For instance, if you are simply on our mailing list to learn about our events we will keep your contact details needed for that purpose but if you are a member of staff or recipient of our services we may need more information. The tables at the end of this policy provide more detail of the types of personal information held by us according to the main types of relationship we have.

Certain kinds of personal information, including information about racial or ethnic origin and physical or mental health, are special categories of personal information which are subject to additional protections by law. We limit the circumstances in which we collect and use special category information of this kind as required by law or with your explicit consent. For instance, we may need to know about a disability in order to fulfil our safeguarding responsibilities and it may be helpful for us to have information on ethnic origin to assess our impact as a charity or meet expectations of our funders. We identify in the tables at the end where this might be relevant to you.

Special legal safeguards also apply to collection and use of criminal record information. We are required to collect and use criminal record information in certain circumstances, for instance to carry out Disclosure and Barring Checks on staff or volunteers who will be working with children or vulnerable adults. We identify in the tables at the end where this may be relevant to you.

## **3) How we use your personal information:**

We can only use your personal information when the law allows us to. Most commonly we will use your personal information in the following circumstances:

- To enter into or to perform a contract with you, or
- To comply with a legal or regulatory 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.
- When you consent to it.

Other lawful purposes include where it is necessary to protect the vital interest of you or another person or for the performance of a task carried out in the public interest.

In the tables at the end we identify the legal basis for using the various types of personal information we hold. If we rely on our legitimate interests for using your personal information, we identify what the legitimate interest is where appropriate.

## **4) Marketing and information you provide to others**

We may receive some information that you submit to a third party website to be shared with us. Both we and the owner or operator of that third party site will be data controllers in respect of that information and you should check that privacy policy of that website to find out how they will use your data. We will only use any information that we receive from that route in accordance with this policy.

In particular, we send our marketing communications via MailChimp. MailChimp acts as the data controller and collects information via sign up forms on our website and facebook page. The information is stored in our MailChimp account in order to allow us to create and use distribution lists for use in our marketing campaigns. We may send you marketing communications via MailChimp if you have indicated that you are happy to receive such emails or if you signed up yourself on the newsletter link on our website or facebook page. Our marketing

communications include information about our new projects or workshops which you might want to be a part of, performances which you might want to come and see and ways that you might like to support or engage with us.

If you have previously opted-in to receiving Marketing emails from us through MailChimp you can easily opt out of them by clicking on the unsubscribe link which we include at the bottom of the marketing emails.

Please note that if you tell us that you do not wish to receive marketing emails, you will still receive Information emails if you are a member of Kinetika Bloco and have previously signed up to attend activities. If you would like to be removed from the membership list of Kinetika Bloco and not receive information about Summer School, Projects and Performances please email [tamzyn@kinetikabloco.co.uk](mailto:tamzyn@kinetikabloco.co.uk)

## **5) How long we keep your information**

We keep your personal information only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we use the information and whether we can achieve those purposes through other means, and applicable legal requirements.

We may need to keep information in case it could be needed to bring or defend legal claims (which can be brought up to six years after the claim arose) or to meet tax record keeping or other legal or regulatory requirements. This would particularly apply to personal information relating to our employees or freelancers and, in some cases, beneficiaries of our services.

We will actively review the information we hold and when there is no longer a legal basis for us to retain it, we will either delete it securely or in some cases anonymise it (in which case we may use this information indefinitely without further notice to you).

## **6) How we protect your information**

We protect your personal information against unauthorised access, unlawful use, accidental loss, corruption or destruction.

We use technical measures such as 2 step password protection to protect your information and collected by us the systems they are held in. We also use operational measures to protect the information, for example by limiting the number of people who have access to our database and by using cloud storage from reputable providers to minimise risks of keeping hard copy records. We ensure that our employees, agents and contractors are aware of their privacy and data security obligations]

We keep these security measures under review and refer to industry security standards to keep up to date with current best practice.

Our member emails including information for attending workshops and events are sent from our Kinetika Bloco email account. Data transmission over the internet is inherently insecure, and we cannot guarantee the security of information sent over the internet, including by e mail. Group emails will be sent BCC where appropriate.

We send our newsletters through MailChimp, we do not download or transfer information from their website to our own. For information on how MailChimp protect your information please visit:

<https://mailchimp.com/legal/privacy/>

## 7) Disclosing your information

We will never sell your personal information and will not share or distribute it to others except as expressly set out in this policy or as otherwise required or permitted by law.

We have identified in the tables at the end when we share personal information we hold for purposes of contractual obligations and legitimate interest. In those cases, we require the third parties to respect the security of your personal information and treat it in accordance with the law. We do not allow our third-party providers to use your personal information for their own purposes and only permit them to use your personal information for specified purposes and in accordance with our instructions.

We may have to provide your personal information to government authorities in order to comply with laws and regulations that apply to us. For instance, we have reporting obligations to the Charity Commission of England and Wales. If we are requested to disclose information by the police or a regulatory or government authority investigating potentially illegal activities concerning your activities in connection with our services or website we may do so.

- **Your credit and debit card information:** We process payments on our website using PayPal. PayPal monitor every transaction with a view to preventing fraud, email phishing and identity theft and every transaction is encrypted using their advanced encryption technology. For more information on their privacy and protection process please visit <https://www.paypal.com/uk/webapps/mpp/paypal-safety-and-security>.

## 8) International data transfer

We will only send your personal information outside of the European Economic Area (EEA) to: follow your instructions or to comply with a legal duty.

## 9) Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information, in particular:

- Request access to your personal information
- Request correction of your personal information
- Request erasure of your personal information
- Object to processing of your personal information
- Request restriction of processing of your personal information
- Request transfer of your personal data
- Right to withdraw consent.

Further information on these rights is available from the ICO website. <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please contact us using the contact details set out paragraph 1 above.

Please note that even if you withdraw your consent, we can still rely on the consent you gave as the lawful basis for processing your information before you withdrew your consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or exercise your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

When you get in touch, we will come back to you as soon as possible and where possible within one month. If your request is more complicated, it may take a little longer to come back to you but we will come back to you within two months of your request. We may also ask you to verify your identity before we provide any information to you.

If Kinetika Bloco decides to change this privacy policy, the changes will be posted on this page.

## 10) Questions and complaints

If you have any questions about this policy or how we handle your personal information, please contact us (see paragraph 1 above).

You have the right to make a complaint at any time to the supervisory authority which is responsible for the protection of personal information in the UK if you think a breach of information protection laws might have taken place. In the UK, the relevant authority is the Information Commissioner's Office which can be contacted by telephone on 0303 123 1113, or by using the live chat service which is available through the Information Commissioner's website [www.ico.org.uk](http://www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO.

## 11) Website Information

Our website may include links to third-party website, plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share personal information about you. We do not control these third-part websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Information collection is changing. Traditionally, information was collected directly from individuals, for example when they filled in a form. Increasingly, organisations use information that has not been consciously provided by individuals in this way. It may be:

- **observed**, by tracking people online or by smart devices;
- **derived** from combining other information sets; or
- **inferred** by using algorithms to analyse a variety of information, such as social media, location information and records of purchases in order to profile people for example in terms of their state of health or suitability for a job.

Kinetika Bloco does not currently collect information in any of these ways, nor does it see itself doing so in the near future. We have a very small staff team and no individual marketing role so we spend our time delivering projects rather than following people's web presence!

Whilst you use our website we will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure (password- and firewall-protected) servers. All electronic financial transactions entered into through our website will be protected by encryption technology.

## 12) Cookies

Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Most browsers allow you to refuse to accept cookies and to delete cookies already stored on your computer, please refer to your particular browser for guidance on how to refuse or delete them. Blocking or deleting all cookies will have a negative impact upon the usability of many websites, you may not be able to use all the features on our website.

### 13) Tables

These tables indicate the different information we collect for you, how, why and the basis for which we collect it.

#### Employees (full time or part time)

Type of personal information	How information is obtained	Purpose for which information used	Disclosure outside Kinetika Bloco [Note 1]	Legal basis for use
Contact details Gender Bank details NI number Medical info* Ethnicity*	From you via payroll form or otherwise CV or application form	HR admin Pay Pension Funding reports (aggregated)	Payroll and pension providers  [Funders, if required]	<b>Performance of a contract with you</b>  <b>Legal Obligation</b>  <b>Legitimate interest</b> (eg to provide our services in the best way possible and to meet expectations of funders or regulators)
Criminal* [Note 2]	DBS Service		Reporting to funders, clients and strategic bodies who finance, support or oversee the charity]	

#### Freelance worker or practitioners (paid or unpaid)

Type of personal information	How information is obtained	Purpose for which information used	Disclosure outside Kinetika Bloco	Legal basis for use
Contact details Gender Bank details NI number Medical info* Ethnicity* Criminal [Note 2]	From you via invoice form or otherwise CV or application form DBS Service	HR admin Pay Scheduling Funding reports	Reporting to funders, clients and strategic bodies who finance, support or oversee the charity	<b>Contract</b>  <b>Legal Obligation</b>  <b>Legitimate interest</b> (eg to meet expectations of funders or regulators)  Ensuring we have the correct ratio of staff to children on events - Male/Female, Age range,

				<p>SEN/Disability support. On trips or residential events managing travel requirements, room sharing, dietary provision.</p> <p>Monitoring and evaluating our delivery of projects to help us improve our service for the beneficiaries</p> <p><b>Consent</b>, when no other basis applies</p>
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### Board members/trustees

Type of personal information	How information is obtained	Purpose for which information used	Disclosure outside Kinetika Bloco	Legal basis for use
Contact details Date of birth Gender	Board application form.	Charity administration and management	Legal disclosures, including to Companies House (note some information is made public). To funders and others where necessary.	<b>Legal obligation</b>  <b>Legitimate interest</b> (proper governance and administration)

### Bloco members [or other recipients of our services]

Type of personal information	How information is obtained	Purpose for which information used	Disclosure outside Kinetika Bloco	Legal basis for use
Contact details Gender Date of Birth Ethnicity* Medical info* Statement or Disability information* Ethnicity*	<p>From you via website sign up form.</p> <p>If under 18, from parents/carer on website sign up form and on medical parental consent form.</p> <p>From social worker or school worker if referred through personal contact with Bloco Manager</p>	To issue Information on activities Scheduling Insurance Welfare ratios Funding reports	<p>[Insurers]</p> <p>Reporting to funders, clients and strategic bodies who finance, support or oversee the charity</p>	<p><b>[Legitimate interest]</b> (eg to meet expectations of funders or regulators)</p> <p>Fulfilling our charitable objectives to provide advancement in education</p> <p>Monitoring and evaluating our delivery of projects to help us improve our service for the beneficiaries</p>

				<p>Demonstrating impact to funders/ supporters / strategic bodies in order to lever continued support</p> <p>NB all information in funding reports is anonymised or given in %'s</p>
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**Parents, carers, legal guardians**

Type of personal information	How information is obtained	Purpose for which information used	Disclosure outside Kinetika Bloco	Legal basis for use
Contact details Gender Relationship to dependant Medical info occasionally*	From you via website sign up form / email.  [From dependant if special communication required.]	To issue information on activities  Members welfare Volunteering info		<p><b>Legal obligation</b></p> <p><b>Legitimate interest</b></p> <p>Sending out sign up information and forms for Summer School or Bloco workshops</p> <p>Informing members of performances and workshops they can join</p> <p>Sharing information from partner organisations on further creative progression routes, job opportunities or additional projects            Keeping our records up to date</p> <p>Fulfilling our charitable objectives to provide recreational and leisure time activities provided in the interest of social welfare designed to improve young people's conditions of life and providing support activities which develop skills, capacities and capabilities</p>

**Friends/supporters, alumni, website visitor**

Type of personal information	How information is obtained	Purpose for which information used	Disclosure outside Kinetika Bloco	Legal basis for use
<p>Contact details</p> <p>Where applicable only, bank details</p>	<p>From subject via website sign up form or donation form.</p> <p>From subject via mailchimp newsletter sign up form</p> <p>(coming soon: Through website purchasing system)</p> <p>Following up on Donations</p> <p>NB currently all giving is completed through Local giving or a similar website and we would follow their Information policy OR by direct contact with Bloco Manager through email</p> <p>Sending thank you messages for donations</p> <p>Sending information about future campaigns that donors may like to give to</p> <p>Procurring additional or ongoing support for Kinetika Bloco activities</p>	<p>To issue information about activities</p> <p>Volunteering opportunities</p> <p>Donations</p>		<p><b>Legitimate interest</b></p> <p>Keeping our records up to date</p> <p>Harnessing support for the work of the young people and for the charity in order to continue providing activities with charitable objectives</p> <p><b>Consent</b></p>

\*This identifies special category information or other information to which special safeguards apply in law, as explained above.

## General notes

We may use your personal data for more than one lawful ground depending on the specific purpose for which it is being used. Please contact us if you need more details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table.

In some cases, we have indicated that we may use personal information to report to others, such as funders or regulators. However, in most cases the information would be aggregated so that it would not be possible to identify you from the information disclosed.

**Note 1** – Trustees and staff are considered to be internal in this context. Our trustees have the right to access any personal information used by us in performance of their functions. Our staff will have access to all personal information covered by this policy subject to any internal procedures (for instance, in relation to other staff or where necessary to comply with data protection or other laws).

**Note 2** –In carrying out DBS checks, we will adhere to the DBS code of practice and other legal requirements relating to the information.