



## **NVR-UK Privacy Policy**

NVR-UK is committed to protecting the privacy of all people whom we hold information on (referred to as data subjects). The following policy outlines how we use and protect your information and who to contact if you have any issues or queries regarding our Privacy Policy. This policy is fully compliant with GDPR regulations.

NVR-UK is registered with the Information Commission Office (ICO) under the data protection act 1998. Our reference number is:

### **1. Contact NVR-UK**

If you have any queries or requests concerning this Privacy Policy or how we handle your data more generally, please get in touch with us by email. [UKNonViolentResistance@gmail.com](mailto:UKNonViolentResistance@gmail.com)

### **2. How we collect your information**

We collect your personal information when you interact with us or use our services. We also look at how visitors use our website. We use this information to help us improve our services and optimise customer experience.

We collect information:

- when you contact us directly via email, post or via social media
- when you complete a booking, application, evaluation forms (online and hard copy) for NVR-UK services;
- when you browse and use our website (see cookie policy which is displayed when you visit our website);
- when your personal information is passed on to us (with your consent) from authorised third-parties.

### **3. Information that we collect from you**

As part of our commitment to the privacy of our data subjects and visitors to our website, we want to be clear about the sorts of information we will collect from you.

When you contact us (or your personal information is passed on to us from authorised third parties) and you provide information about yourself which includes your name, contact details, address and details of your enquiry.

We also collect information about your usage of our website (and/or social media platforms) and information about you from any messages you post to our website (and/or social media platforms) or when you contact us or provide us with feedback , including via e-mail, letter, phone or chat function.

We process health information about you only where you volunteer and consent to this, for example if you specify any food allergies on Training

#### **4. Use of your information**

We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law. We will have a lawful basis for processing your information: if we need to process your information in order to provide you with the service you have requested or to enter into a contract; if we have your consent; if we have a justifiable reason for processing your data; or if we are under a legal obligation to do so.

Where we need to, in order to provide you with the service you have requested or to enter into a contract, we use your information:

- to enable us to provide you with access to relevant information;
- to supply the services you have requested;
- to enable us to collect payment from you; and
- to contact you where necessary concerning our services, such as to resolve issues you may have with the service you have received from NVR-UK.

We also process your data where we have a justifiable reason for doing so – for the following reasons:

- to improve the effectiveness and quality of service that you and others our service can expect from us in the future;
- to enable us to help you with any enquiries or complaints in the most efficient way possible;
- to contact you for your views and feedback on our services and to notify you if there are any important changes or developments to our website or our services.
- to analyse your activity on our website so that we can administer, support, improve and develop our organisation and for statistical and analytical purposes;
- to enforce our contractual terms with you and any other agreement, and for the exercise or defence of legal claims and to protect the rights of NVR-UK, and our employees; and
- if you submit comments and feedback regarding our services, we may use such comments and feedback on our website, social media and any marketing or advertising materials with your consent. We will identify you for this purpose with your first name and the city/area in which you live.

Where we are under a legal obligation to do so we may use your information to:

- create a record of your interactions with NVR-UK;
- comply with any legal obligation or regulatory requirement to which we are subject.

## 5. Direct marketing

Where you have given your consent or where we have a justifiable reason for doing so (and are permitted to do so by law) we will use your information to let you know about our other products and services that may be of interest to you and we may contact you to do so by email or phone. You can control your email marketing preferences by:

*Clicking on the unsubscribe button to be found on the footer of every NVR-UK mail out.*

## 6. Retention of your information

We will not retain your information for any longer than we think is necessary.

Information that we collect will be retained for as long as needed to fulfil the purposes outlined in the 'Use of my information' section above, in line with our legitimate interest or for a period specifically required by applicable regulations or laws, such as retaining the information for regulatory reporting purposes.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- our legitimate interests (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

## 7. Disclosure of your information

The information we collect about you will be transferred to and stored on our servers located within the EU (Go Daddy Operating company) We are very careful and transparent about who else your information is shared with.

### Sharing your information internally

We share your information internally only where necessary for the purposes set out in section 4.

### Sharing your information with third parties

We share your information with third party service providers only where necessary for the purposes set out in section 4. The types of third party service providers whom we share your information with includes:

**Payment providers** (including online payment providers and fraud detection providers): for the purposes of providing services to us, for example when they process information such as credit card payments for us, provide support services to you or carry out fraud checks for us;

**IT service providers** (including cloud providers): for the purposes of data storage, management and analysis;

NVR-UK will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We may also share your information:

- if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation or regulatory requirement. This includes exchanging information with other companies and other organisations for the purposes of fraud protection and prevention;
- in order to enforce our contractual terms with you and any other agreement;
- to protect the rights of NVR-UK, or others to prevent fraud; and
- with such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police.

## 8. Security

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected.

We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the NVR-UK website and social media streams: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 9. Your rights

Under data protection law, you may have a number of rights concerning the data we hold about you. **If you wish to exercise any of these rights, please e-mail: [UKNonViolentResistance@gmail.com](mailto:UKNonViolentResistance@gmail.com).** For additional information on your rights please contact your data protection authority and see below.

**The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this policy.

**The right of access.** You have the right to obtain access to your information (if we're processing it). This will enable you, for example, to check that we're using your information in accordance with data protection law.

**The right to rectification.** You are entitled to have your information corrected if it is inaccurate or incomplete.

**The right to erasure.** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you.

**The right to restrict processing.** You have rights to 'block' or 'suppress' further use of your information. When processing is restricted, we can still store your information, but will not use it further.

**The right to data portability.** You have the right to obtain your personal information in an accessible and transferrable format so that you can re-use it for your own purposes across different service providers.

**The right to lodge a complaint.** You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority, for the UK this is the Information Commissioners Office (ICO).

**The right to withdraw consent.** If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. Withdrawing consent will not however make unlawful our use of your information while consent had been apparent.

**The right to object to processing.** You have the right to object to certain types of processing, including processing for direct marketing and profiling. You can object by changing your marketing preferences or disabling cookies as set out in sections 5 and 6 above.

## **10. Changes to NVR-UK's Privacy Policy**

Any changes to our privacy policy will be posted on the NVR-UK website and, where appropriate, we will notify you of the changes by email.

This privacy policy was last updated: 09/03/2019

## **11. Complaints**

If you're not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) using the following details:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)