

# Digital Commons Privacy Policy

This privacy policy tells you what to expect us to do with your personal information when you make contact with us or use one of our services.

## 1) General Information

We'll tell you:

- how we collect your information
- what purpose we are processing it for
- whether there are other recipients of your personal information
- whether we intend to transfer it to another country, and
- whether we do automated decision-making or profiling.

## 2) Contact information

Digital Commons Ltd is the controller for the personal information we process, unless otherwise stated.

You can contact us by email and post.

Our postal address: Makespace Oxford, 1 Aristotle Lane, Oxford, Oxfordshire, OX2 6TP

Email: [hello@digitalcommons.coop](mailto:hello@digitalcommons.coop)

Our Data Protection Officer is Kate Swade. You can contact her at [hello@digitalcommons.coop](mailto:hello@digitalcommons.coop) or via our postal address. Please mark the envelope 'Data Protection Officer'.

## 3) How do we get information?

Most of the personal information we process is provided to us directly by you for one of the following reasons (please note this list is not exhaustive):

- You have registered to use one of our software services (including but not limited to Land Explorer, Cooperatives Connect)
- You subscribe to our e-newsletter
- You wish to attend, or have attended, an event
- You are representing your organisation
- You contacted with us a query you thought we could help with
- You have applied for a job, freelance position or secondment with us

We also receive personal information indirectly, in the following scenarios:

- In the metadata of our Cooperatives Connect service.
- An employee or coop member of ours gives your contact details as an emergency contact or a referee

- We may find, through online research, and store, publicly available information about you where we have a legitimate interest (e.g. in relation to ongoing or potential business)

#### **4) What purpose are we processing it for?**

The legal basis we rely on to process your personal data is usually Article 6(f) of the UK GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests. In some circumstances, we rely on Article 6(a), where you have given clear consent for us to process your personal data for a specific purpose, such as our newsletter.

Specifically, we will often process your data for the purpose of:

- Asking for feedback on our software services.
- Keeping in touch with relevant news, offers, research or related correspondence
- Promoting, booking or managing events
- Communicating in relation to ongoing or potential business; and associated correspondence or enquiries
- Employment related matters

#### **5) Your Data Protection rights**

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

##### **Your right of access**

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this on the ICO website here.](#)

##### **Your right to rectification**

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this on the ICO website here.](#)

##### **Your right to erasure**

You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this on the ICO website here.](#)

##### **Your right to restriction of processing**

You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this on the ICO website here.](#)

##### **Your right to object to processing**

You have the right to object to us processing your information in certain circumstances. [You can read more about this on the ICO website here.](#)

##### **Your right to data portability**

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this on the ICO website here.](#)

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

Please contact us at [hello@sharedassets.org.uk](mailto:hello@sharedassets.org.uk) if you wish to make a request.

## 6) Sharing your information

We will not share your information with any third parties for the purposes of direct marketing.

We use data processors who are third parties who provide elements of services for us.

The ICO defines a "processor" as: "data processor", in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

"Processing", in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- a) organisation, adaptation or alteration of the information or data,
- b) retrieval, consultation or use of the information or data,
- c) disclosure of the information or data by transmission, dissemination or otherwise making available, or
- d) alignment, combination, blocking, erasure or destruction of the information or data (edited)

**Don't worry, this isn't as onerous as it sounds, but it covers the fact that we store your data in a database (Hubspot CRM, or a password protected Google Drive) and use software like Mailchimp or Buttondown to email you.**

We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Where we contract with third parties for the processing of your data, these may be located outside the EU (in the USA). When this is the case, we ensure the contracts we have in place with those third parties meet the requirements of the GDPR.

In some circumstances we are legally obliged to share information. For example under a court order (where we have considered we have a lawful basis on which to share the information and document our decision making).

## 7) Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## 8) Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at [hello@digitalcommons.coop](mailto:hello@digitalcommons.coop) and we'll respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the ICO as the UK supervisory authority. Please follow [this link](#) to see how to do that.

## 9) Changes to this Privacy Policy

We keep our Privacy Policy under regular review to make sure it is up to date and accurate.

## 10) Visitors to our website

### Analytics

When you visit [www.digitalcommons.coop](http://www.digitalcommons.coop), we may use a third-party service to collect standard internet log information and details of behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow any third party service to make any attempt to find out the identities of those visiting our website.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

### Cookies

We use a cookies tool on our website which relies on implied consent of users. In recognition of the fact that the implementation date for the revised e-Privacy Regulation remains unknown, we are taking reasonable steps now to align our use of cookies to the standard of consent required by GDPR.

We will ensure any necessary cookies for functionality and security are not deleted.

### Search engine

Search queries and results on our website are logged anonymously to help us improve our website and search functionality. No identifiable personal information is collected by us.

### Purpose and legal basis for processing

The purpose for implementing the above is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users.

**11) Automated decision-making or profiling**

We do not use automated decision making. We may occasionally profile your data for the purpose of marketing and finding customers with similar interests.