

# **Opus Independents Ltd**

## **Privacy Policy**

### **Introduction**

Welcome to Opus Independents Ltd's privacy policy. Opus Independents respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after the personal data which is collected when you visit our website (regardless of where you visit it from), our application, or when you have otherwise provided personal data to us off-line in the course of our dealings with you. It will also tell you about your privacy rights and how the law protects you.

### **Purpose of this Privacy Notice**

### **Controller**

Opus Independents is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice).

### **Contact Details**

Full name of legal entity: Opus Independents Ltd

The full names of the Directors at Opus Independents & the email addresses for contacting them are:

- James Lock - james@weareopus.org
- Sam Walby - sam@weareopus.org
- Felicity Jackson - flick@weareopus.org
- Joe Kriss - joe@weareopus.org

Postal address:

Opus Independents Ltd  
71 Hill Street,  
Sheffield,  
South Yorkshire,  
S2 4SP

Telephone number: +44 (0)7841 526 822

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would,

however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Data Protection Officer's Contact Details**

Our Data Protection Officer is Felicity Jackson. You can contact her on flick@weareopus.org or via our postal address. Please mark the envelope 'Data Protection Officer'.

### **Changes to the Privacy Notice and Your Duty to Inform Us of Changes**

This is our first Privacy Notice to be issued following the launch of the General Data Protection Regulations. We may update this Privacy Notice from time to time and details of our archived Privacy Notices will be listed here. It is important that the personal data we hold about you is up-to-date and accurate. Please keep us informed if your personal data changes during your relationship with us.

### **Third Party Links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party 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.

### **What Data We Collect & How We Process It**

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

#### **Identity Data**

Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

#### **Contact Data**

Includes billing address, delivery address, email address and telephone numbers.

#### **Financial Data**

Includes bank account and payment card details.

### **Transaction Data**

Includes details about payments to and from you and other details of products and services you have purchased from us.

### **Technical Data**

Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and application.

### **Profile Data**

Includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

### **Usage Data**

Includes information about how you use our website, products and services.

### **Marketing and Communications Data**

Includes your preferences in receiving newsletters from us.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you - this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

### **If You Fail to Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to provide you with goods or services. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at any time.

## **How Is Your Personal Data Collected?**

We use different methods to collect data from and about you including through:

### **Direct Interactions**

You may give us your Identity, Contact, Marketing Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when:

- You wish to attend, or have attended, an event.
- You subscribe to our e-newsletter.
- You sign-up to the Now Then App.
- You apply for a job, work experience or internship with us.
- You are representing your organisation.
- You have made a complaint or enquiry to us.
- You have made an information request to us.

### **Third Parties or Publicly-Available Sources**

We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) Analytics providers such as Google based outside the EU.

## **How We Use Your Personal Data**

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

Where we need to comply with a legal or regulatory obligation:

**Legitimate Interest** means the interest of our business in conduction and managing our business to enable us to give you the best service / product and the best and most secure experience. We make sure we consider and balance any potential impact on you, both positive and negative, and your rights before we process your personal data for our legitimate interest. We do not use your personal data for activities when our interests are overridden the the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a **legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on [flick@weareopus.org](mailto:flick@weareopus.org)

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you wish to change these at any time please email [flick@weareopus.org](mailto:flick@weareopus.org) or use the following personal data control mechanisms:

### **1. Third-Party Marketing**

We will get your express opt-in consent before we share your personal data with any company outside the COMPANY for marketing purposes.

### **2. Opting Out**

You can ask us or third parties to stop sending you marketing messages at any time (by logging into the App and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or) by contacting us at [flick@weareopus.org](mailto:flick@weareopus.org) at any time.

### **3. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly.

### **4. Change of Purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on [flick@weareopus.org](mailto:flick@weareopus.org).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal

data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **International Transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention - How Long Will You Use My Personal Data For?**

We will only retain your personal data 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 data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **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.

#### **Request Access**

You have the right to ask us for copies of your personal information. This right always applies.

#### **Request Correction**

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.

#### **Request Erasure**

You have the right to ask us to erase your personal information in certain circumstances.

### **Object to Processing**

You have the right to ask us to restrict the processing of your information in certain circumstances.

### **Request Restriction of Processing**

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests.

### **Request the Transfer**

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.

### **Withdraw Consent at Any Time**

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **No Fee Usually Required**

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.

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

### **What We May Need From You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access personal data, or to exercise any of 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.

### **Time Limit to Respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **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. 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.

In some circumstances we are legally obliged to share information. For example, under a court order.