# **Privacy Policy**

# **Introduction**

The Community Transport Association UK (CTA UK) is committed to maintaining high standards of privacy and data protection for our stakeholders and those we work with. This privacy policy lets you know what happens to any personal data that you share with us, or any that we may collect from or about you. We have aimed to provide this information concisely and in clear language. This privacy policy aims to cover each of our fair processing activities but if you need further information, please feel free to contact us. We may update this policy periodically. Please review this page regularly to stay informed of any changes.

**Who We Are**

For the purpose of the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018, the data controller is Community Transport Association UK, 91 Princess Street, Manchester M1 4HT. We handle your information in accordance with the GDPR, the UK Data Protection Act 2018, and other applicable data protection laws.

**The Type of Personal Information We Collect**

We collect and process various types of personal information, including but not limited to:

1. Business contact information, such as your full name, email address, social media handles, job title, mobile phone number, and the organisations that you are associated with.
2. Records of your registration and attendance at events, such as conferences, seminars, training sessions, and formal meetings that we organise or host.
3. Training contact information, such as your full name, email address, telephone number, and the organisation you are associated with.
4. Records of your contact and activities with us, including emails, notes from phone calls, and face-to-face meetings.
5. Records where we have provided advice and support on matters regarding community transport services, or consultancy work.
6. Records of your subscriptions to email bulletin products such as News Brief, including a log of whether you open the emails and click on links.
7. Photographs, video, and/or sound recordings of events and training sessions for use in printed and electronic media, for promotional and archival purposes.
8. User account records for the CTA website and login portal.
9. Recruitment-related information, such as your resume/CV, cover letter, employment history, qualifications, interview notes, and any other personal details submitted during the job application process.

**Information We Collect About You From Other Sources**

We collect standard internet log information such as your IP address and visitor behaviour patterns. We use Google Analytics to analyse website traffic. For more information about Google’s security and privacy principles, visit this [link](https://policies.google.com/privacy?hl=en). You can control how Google uses your information for ad personalisation [here](https://adssettings.google.com/authenticated).

We also collect survey responses for our State of the Sector and other surveys. We use Microsoft Forms, and/or Civi Mail for our sector research surveys and event and training feedback. You can read the Microsoft privacy notice [here](https://privacy.microsoft.com/en-us/privacystatement).

**What Are the Lawful Bases for Our Processing of Your Personal Data?**

We use the following lawful bases to process personal data:

* Where it is in our legitimate interest to provide confirmations or updates about products or services we provide you with, such as fulfilling your request to attend events, participate in training courses, or help you with advice and support.
* Where it is in our legitimate interest to provide our organisational membership service by keeping business contacts informed about membership services and sector updates, including News Briefs.
* By subscribing to our email bulletin such as News Brief, you consent to us storing your contact information and contacting you. You can unsubscribe at any time via the email or by contacting us at comms@ctauk.org.
* Where we have legal obligations under UK and other applicable law, including the UK Data Protection Act 2018, such as fraud prevention, the exercise of consumer rights, and under equal opportunity responsibilities.
* Where we have legal obligations to register your participation in training courses.

MiDAS Privacy policy. Our policy can be found here - [MiDAS Privacy Policy](https://member.ctauk.org/midas/privacy-policy).

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

* To meet our compliance and regulatory obligations, such as compliance with the Companies Act, anti-money laundering laws and tax reporting requirements
* for the prevention and detection of crime
* In order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities

We may also process your personal data where:

* It is necessary for the establishment, exercise or defense of legal claims (for example, to protect and defend our rights or property, and/or the rights or property of our members)
* We have your specific or, where necessary, explicit consent to do so

**Your Rights Under Data Protection Laws**

The General Data Protection Regulation (GDPR), the UK Data Protection Act 2018, and other applicable data protection laws provide the following rights to you:

* The right to be informed about the processing of your personal information.
* The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
* The right to object to the processing of your personal information.
* The right to restrict the processing of your personal information.
* The right to have your personal information erased (the “right to be forgotten”).
* The right to request access to your personal information and to obtain information about how we process it.
* The right to move, copy, or transfer your personal information (“data portability”).
* Rights in relation to automated decision-making which has a legal effect or otherwise significantly affects you.

We are committed to upholding your rights. You can contact us for further clarification or any concerns you have regarding your personal data that we hold, by contacting the Data Protection Lead using the details below. Please note that the exercise of your rights is dependent on the lawful basis that has been used for each processing activity.

You also have the right to lodge a complaint with the Information Commissioner’s Office which enforces data protection laws: [ICO Concerns](https://ico.org.uk/concerns).

**We Use the Information That You Have Given Us In Order To:**

* Provide confirmations or updates about products or services we/or commercial affiliates provide.
* Help you with advice and support.
* Keep business contacts informed about membership services and sector updates.
* Register your participation in training courses.
* Analyse website traffic and user behaviour for improvement.
* Conduct surveys and gather feedback.

**We May Share This Information With:**

* MRD Technologies (Our IT provider)
* Red Hot Irons Limited (our CRM provider) and Circle (hosts our website and CRM system)
* Stripe (payment processing)
* Aleido (Learning Management System)

**Sharing your information with others**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data to a variety of recipients including:

* our employees, agents and contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process data on our behalf as part of administering our membership system or events
* internal and external auditors
* when legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by the Charity Commission

We do not sell your personal data to other organisations.

**Data Security and Retention**

We minimise the amount of personal data we keep about you and the period of time we hold it for. We implement robust security measures to protect your personal data and regularly review our practices to ensure they meet high standards. In some cases, we retain records for the length of time that we are legally obliged to do so (for example, invoices, payment information, job application and monitoring information, minutes of general meetings, and trustee decisions). In other cases, we apply our retention schedule when we no longer require personal data and ensure its secure deletion or disposal.

We make sure that we don’t collect more personal information than we need in order to carry out our activities and review our practices regularly. When we use third-party services and cloud services to process personal data, we take due diligence to make sure that they are reputable and have appropriate data protection practices. Where these services are outside the UK or European Economic Area (EEA), we ensure appropriate safeguards are in place to protect your data.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

**Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:**

* Your consent. You are able to remove your consent at any time. You can do this by contacting the Director of People & Operations, 91 Princess Street, Manchester, M1 4HT, info@ctauk.org.
* We have a contractual obligation (This mainly applies in the administration of MiDAS).
* We have a legal obligation (in ensuring, for example, your duty of care).
* We have a legitimate interest.

**How We Store Your Personal Information**

Your information is securely stored. We minimise the amount of personal data we keep about you and the period of time we hold it for. In some cases, we retain records for the length of time that we are legally obliged to do so (for example, invoices, payment information). In other cases, we apply our retention schedule when we no longer require personal data and ensure its secure deletion or disposal. We will ensure your personal information is disposed of appropriately and irretrievably when it is no longer necessary for us to store it.

**Cookies and Analytics**

We collect information about your visits to our sites, including where available, your IP address, operating system, and browser type. The data cannot be used to identify any individual. To help us gather this information, we use cookies; small files stored on the hard drive of your computer. Cookies allow us to improve our site and deliver a better service.

This includes:

* If you leave a comment on our site, you may opt-in to saving your name, email address, and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.
* If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.
* When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you log out of your account, the login cookies will be removed.
* Remember me on this computer: If you choose this option when logging on, a cookie will be recorded.
* Session cookie: In order to recognise you as a logged-on visitor, a cookie is written to record an id for the session. This cookie expires when you stop using the site. It does not record any personal information.
* Please note: If you disable cookies on your computer, you will not be able to log on.
* Google Analytics cookies: We use Google Analytics, a popular web analytics service provided by Google Inc. Google uses cookies to collect and analyse information about how the website is used. Google undertakes not to associate your IP address with other data held by Google. Find out more about Google Analytics [here](https://support.google.com/analytics/answer/6004245).

If you do not wish to accept cookies, you can adjust your browser settings; however, this may limit your access to certain parts of our website. For more information about cookies and how to manage them, visit [About Cookies](http://www.aboutcookies.org/).

**Changes to This Privacy Policy**

We may change this privacy policy from time to time by updating this page to reflect changes in the law, the type of work we do, and our privacy practices. We will notify our members and other stakeholders of any significant changes to our privacy practice via our website and other digital channels. Please check this page periodically to ensure you are aware of the latest version of this policy.

If we change providers, use new ones, a provider changes names you will need to update and notify everyone of the change to the policy each time as this could mean a significant change to the policy.

This policy is reviewed annually and was last updated in August 2024.

**Contact Us**

You can contact our Data Protection Lead using one of the following channels:

**Email:**

info@ctauk.org

**Write to us:**

Community Transport Association UK, 91 Princess Street, Manchester, M1 4HT

**Call us**:

0161 351 1475