



Privacy Policy

04.06.24

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Introduction

The Room (a collective fund held by and operated under the auspices of Prism The Gift Fund (registered charity number 1099682) ("Prism") as established by The Room (Oxford) Community Interest Company (company registration number 15714471)) ("The Room" or "we" or "us") is committed to protecting the privacy of your personal data in accordance with Data Protection legislation. Further details about us can be found under "How to Contact Us" below.

This Privacy Policy ("Policy") sets out the basis on which we will process your personal data when you visit our website at <https://theroomoxford.org> (our "Site"), or have any other dealings with us, whether you are (or are potentially) a member, sponsor, volunteer, or professional or business contact. This privacy notice is not intended to override any other privacy notice we provide you in other specific circumstances.

What personal data do we collect from or about you?

If you make an enquiry

If you contact us with an enquiry about The Room (either through our Site or by phone, email or post), we will ask you to supply essential contact details (such as your name, e-mail address, phone number and, where applicable, the company or other person you represent and your job title) which we need in order to identify you and deal with your enquiry.

Depending on the nature of your enquiry, we may collect from you further details, such as the nature of your enquiry and the circumstances in which you are making it.

If you are or become a member or sponsor

If you (or the organisation you represent) are a member or sponsor a membership, we may collect further personal data from you in the course of carrying out our activities.

If you are a member, we will process the personal data that you give us, or we collect from you or about you, on the basis that it is necessary for our legitimate interests in carrying out our activities and performing our contracts.

When you make a payment to The Room (Oxford) Community Interest Company in respect of our activities, certain details, including the method of payment, your bank details or your credit or debit card number will be processed. Similarly, when you make a payment via Just Giving in respect of our activities, personal data will be processed by Just Giving and by Prism. Their privacy policies are available on their websites.

If you are a professional or business contact

If you provide us with your professional or business contact details or other relevant personal data, we will use this in order to keep in touch with you and exchange information that we believe is, or may become, relevant to our and your business or profession.

If you enquire about becoming a volunteer

If you enquire with a view to becoming a volunteer, we will ask you to provide relevant personal information about you. Further details of the personal data that we collect, and of the basis on which we will process your personal data, will be provided at the time.

General

We may collect and process information about the device you use to access our Site or related services, including: IP addresses; preferences; web pages you visited prior to coming to our Site; and information about your browser such as browser type and version, operating system, internet service provider, preference settings, unique device IDs, and language and other regional settings.

We may collect usage data about you whenever you interact with The Room's newsletters or other communications, such as: the date and time you accessed the communication; what pages are viewed from the communication; and metrics related to the deliverability of the communication and other electronic communications.

From time to time we may obtain information about you from third-party sources, such as social media platforms and third-party data providers. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us.

Why and on what basis do we process your personal data?

Enquiries

When you make an enquiry, we will process the personal data that you give us, or we collect from you or about you, so that we can supply you with the information that you have requested about our activities, on the basis that it is necessary for our legitimate interests in promoting our activities and those of our beneficiaries.

Members and sponsors

If you (or the organisation you represent) either are or become a member or sponsor a membership, we will process the personal data that you give us, or we collect from or about you, in order to carry out our activities in respect of the relevant membership or sponsorship.

We will also process your personal data for internal record keeping, billing and accounting, and to respond to any queries, complaints or requests for further information, and for the purposes of archiving. The basis on which we do so is that it is necessary in order to carry out our activities in respect of the relevant membership or sponsorship, or is necessary for our legitimate interests in managing The Room and improving its performance, and to comply with our legal and regulatory obligations.

Personal data shall only be used for the purpose for which it was collected; if we plan to use it for another purpose, we will notify the data subject and explain the legal basis which allows such usage.

Staying in touch

We provide a wide range of information for our current and potential members, sponsors and our professional or business contacts, such as news updates and events. We would like to use

the details on our database in order to inform you of these on the basis that it is necessary for our legitimate interests in promoting our activities and those of our beneficiaries. Please contact us if you do not wish to receive this information.

General

In general, we may use your personal information, information you provide to use through the our Site, and information about how you interact with it and our newsletters and other communications in the following ways: to deliver the services and information offered through our Site and communications; to audit data showing the number of users that have accessed the website and how they are using it; to audit data showing the number of users that have accessed the newsletter and how they are using it; to further our legitimate interest in improving our services and our Site; to meet legal requirements including complying with court orders, valid discovery requests, and other appropriate legal mechanisms; necessary to comply with a legal obligation; to provide information to representatives and advisors, including lawyers and accountants, to help us comply with legal, accounting or security requirements; to provide any information or services requested by you, including our newsletter and event information.

Photographs at events

Photographs of you may be taken at our events and posted on our Site or other communications media. Please let us know if you are not happy for your images to be used in this way.

Membership lists

We may circulate a list of members' names to current members of The Room or may include this list on a members-only area of the Site. Please let us know if you are not happy for your name to be included on this list.

Cookies and other tracking technology

Cookies are text files which are stored on your computer or other device when you visit our Site and any websites it links to. They allow us to distinguish you from other users, which helps us to provide you with a positive experience when you browse our website. Cookies also provide us with information which helps us improve our Site. It is possible to switch off cookies by setting your browser preferences. Please note that turning off cookies may result in a loss of functionality when using our website.

A full list of the types of cookies and other tracking technology we use is available on request.

Third party cookies

Because we utilise certain external applications, for example on certain pages of our Site, third parties may use their own cookies, for the purposes of tracking their application or customising how their application works for you.

Social media platforms

Communication, engagement and actions taken through external social media platforms that our Site and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Who do we share your personal data with?

As a general rule, we do not share your personal information with third parties other than to the extent it is necessary for The Room's operations, in accordance with the purposes for which we use your personal data and the lawful basis for doing so. Accordingly, your personal information may be shared with the following third parties:

IT service providers

To provide the Site, it is necessary for us to engage external IT service providers to help administer the website and host our servers. Your information will be transferred to the external IT service providers who will handle the information as necessary to perform technical services.

Other professionals

In order to provide some of our services, we may require the input of third parties such as lawyers, accountants and financial advisers. This may require the disclosure to such third parties of your contact details and other personal data about you which is relevant to the services they provide. Your information will be transferred to such professionals only as is necessary for the performance of their services.

Law enforcement agencies

We may disclose your personal information to third parties such as law enforcement agencies if we believe disclosure is necessary or appropriate in our legitimate interests to prevent harm or loss, or in connection with an investigation of suspected or actual illegal activity, or when we are required to do so by applicable law.

Professional or business contacts

If you are not a member or sponsor (or a representative of the same) but have provided us with your professional or business contact details or other relevant personal data, we may share your personal data with our other professional or business contacts on the basis that it is necessary for our legitimate interests in promoting and improving our activities, unless you indicate otherwise.

Prism

The Room is a restricted fund held and operated under the auspices of Prism The Gift Fund, registered charity number 1099682 ("Prism"). In order for Prism to administer the collective fund and for us to comply with our service agreement with them, we may need to provide your data to Prism. This may require the disclosure to Prism of your contact details, as well as further personal data about you which is relevant to the services they provide.

General

We may also be required to disclose your personal data to regulators, or where required to do so by order of the court, or to Government departments and local authorities and similar bodies in order to comply with legal obligations or to carry out our activities in respect of the relevant membership of sponsorship.

We may disclose your personal data if we are required to do so in order to comply with any legal or regulatory obligation or request, or where we have a legitimate interest in doing so.

Transfer of Personal Information Outside the EEA

Some of the third parties listed above may be located in jurisdictions outside of the EEA, and we may transfer your personal information to them. In such cases, these jurisdictions or recipients may be less protective of your personal information than the applicable laws in the EEA require.

How long do we keep personal data for?

We keep your personal information only for so long as is necessary for the purposes for which we collected it. When assessing what retention period is appropriate for your personal data, we take into consideration: the requirements of our business and the services provided; any

statutory or legal obligations; the purposes for which we originally collected the personal data; the lawful grounds on which we based our processing; the types of personal data we have collected; the amount and categories of your personal data; and whether the purpose of the processing could reasonably be fulfilled by other means.

If you contact us with an enquiry about our activities but you (or the organisation you represent) do not subsequently become a member or sponsor, it is our policy to delete your personal data after twelve months.

If you (or the organisation you represent) are or become a member or sponsor, we normally retain information (including personal data) for a maximum of 6 years after the end of the relevant relationship.

Personal data relating to our professional and business contacts will be retained for so long as is necessary, or until you indicate otherwise to us, but we will aim to update our contacts' preferences on a periodic basis.

Your rights as a data subject

As a data subject, you have certain legal rights (subject to certain exceptions under the Data Protection legislation) including the right:

- to access the personal data held about you and request a copy of it;
- to ask us not to process your personal data for marketing purposes;
- to withdraw at any time any consent you have given to receive marketing material from us, or in any other case where we process your personal data on the basis of a consent that you have given (and not on some other legal basis);
- to opt out of receiving marketing messages by independently contacting us;
- to ask us to rectify inaccurate personal data about you;
- to ask for the restriction of personal data about you that is inaccurate, unlawfully processed, or no longer required;
- to ask for the transfer of your personal data in a structured, commonly used and machine-readable format where appropriate;
- to ask for the erasure of personal data about you where processing is no longer necessary, or the legitimate interests we have in processing your personal data are overridden by your interests, rights and freedoms as the data subject; and
- to make a complaint to us using the contact details at the top of this privacy notice or, if you are unhappy with how we've used your data after raising a complaint with us, to the Information Commissioner's Office, which can be contacted by here: <https://ico.org.uk/global/contact-us/>.

Changes to this Policy

We may change this Privacy Policy from time to time by making an updated version available on the Site or by contacting you directly.

How to Contact Us

If you have any questions, comments or requests about this Privacy Policy, or would like to exercise any of the rights you have, as set out above, please contact us by email at contact@theroomoxford.org.

The Room is a restricted fund held by and operated under the auspices of Prism The Gift Fund (registered charity number 1099682) and The Room (Oxford) Community Interest Company Limited is a company registered in England and Wales under company registration number 15714471 and whose registered office is at 75d Banbury Road, Park town, Oxford, United Kingdom OX2 6PE.