



# THINK LIKE A PONY CIC PRIVACY NOTICE

## WEBSITE USERS, SUPPLIERS & CONTRACTORS

How we use your personal information

## Preamble

This notice explains what information we process, when we collect it, and how we use it. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you, and we recognise the need to treat it in an appropriate and lawful manner.

It is important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

## Introduction

The purpose of this privacy notice is to explain to you the reasons why we may hold and use your personal data and explain your rights under the current data protection laws. This privacy notice specifically explains how we collect and use personal information about website users, contractors, and suppliers.

Separate versions of Privacy Notices are issued to our employees, and to the users of our virtual platform.

## Who are we?

Your personal information will be processed by:

**Think Like a Pony CIC** of: Otley Old Rd, Horsforth, Leeds. LS18 5HZ

We are registered as a data controller with the Information Commissioner's Office ('ICO') and our registered number is ZA289383.

Think Like a Pony CIC, hereinafter referred to as 'TLAP', controls and processes a range of personal information about you.

## What information do we collect?

### When you visit our website:

We collect the following information:

- Name;
- Contact Details, including phone numbers, addresses and email addresses; and
- IP addresses.

We collect this information when you:

- Navigate our website; and

- Complete and submit a “contact us” form to us, or use the ‘ask’ button.

Please note that our website uses Cookies. You can change your Cookies setting using the ‘Cookies Setting’ tool and review our cookies usage within our Cookie Notice.

## Suppliers and Contractors

We collect the following information:

- Name;
- Contact details, including phone numbers, addresses and email addresses;
- References;
- Bank Details; and
- CCTV imagery.

## Depending on your relationship with us, we may use this personal information to:

- provide you with the services that you have requested from us;
- communicate with you, including in response to any of your enquiries;
- improve our services and respond to changing needs;
- keep the personal information that we hold about you accurate and up to date (including if you provide any new personal information to us via the website); and
- potentially enter into or enter into a contract with you and for the administration of our organisation.

## If you do not wish to provide your personal data:

Where we have entered into a contract, or are negotiating a potential contract, it is necessary for you to provide us with your personal data. If you do not provide this information, this will hinder the TLAP’s ability to enter into or maintain a contract with you.

## What lawful bases do we have for processing your personal information?

We will only process your personal data on one or more of the following legal bases:

- Where we have entered into a **Contract** with you, including pre-contract negotiations;
- Where we have your **Consent**;
- To protect your **Vital Interests**;
- Where we have a **Legal Obligation** to do so; and

- For our **Legitimate Interests**, including CCTV.

### **Processing Special Category Personal Data**

Special categories of information are typically the more sensitive types of personal information, such as your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

These special categories of data require higher levels of protection. Where and when we process special category data, we will meet the additional legal requirements for collecting, storing, and using this type of personal information.

Our lawful bases for processing your special category data may be one of the following:

- (a) Explicit consent
- (b) Employment, social security, and social protection (if authorised by law)
- (c) Vital interests
- (d) Not-for-profit bodies
- (e) Made public by the data subject
- (f) Legal claims or judicial acts
- (g) Reasons of substantial public interest (with a basis in law)
- (h) Health or social care (with a basis in law)
- (i) Public health (with a basis in law)
- (j) Archiving, research, and statistics (with a basis in law)

We may use your special category personal information, including but not limited to the following ways:

- We will use information about your physical or mental health, or disability status, only when provided to us, to ensure your health and wellbeing during any engagement with us.

### **Who do we share your personal information with?**

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, selected third parties, government agencies and regulators, so far as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- where we have your consent.
- to the extent that we are required to do so by law.

- to protect the rights, property and safety of us, our customers, users of our website and other persons.
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, and any regulatory bodies or government agencies involved in any complaint, whether investigating the complaint or otherwise;
- in connection with any ongoing or prospective proceedings;
- to the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling; and
- to another organisation if we enter into a joint venture or merge with another organisation.

### Where do we keep your data?

Your information will only be processed within the UK, except, where international transfers are authorised by law.

### How do we keep your data safe?

When you give us information, we take steps to make sure that your personal information is kept secure and safe.

All personal data is processed in accordance with TLAP's Data Protection Policy and associated procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

However, while we will use reasonable efforts to safeguard your personal information, the use of the Internet is not entirely secure and, for this reason, we cannot guarantee the security of any personal information that is transferred by or to you via the Internet. If you have any concerns about the security of your personal information, please see the contact details at the bottom for more information.

### How long do we keep your data?

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law and in accordance with our Data Retention Policy and Schedule.

### Your rights

You have the right at any time to exercise your data subjects' rights in relation to the following:

- **the right to be informed:** you have the right to be informed about the collection and use of your personal data.

- **the right to access:** you can request a copy of the information that we hold about you
- **the right to rectification:** you can ask us to correct any personal data which we hold about you if you think that this is inaccurate or incomplete. Please note that you are responsible for letting us know if the personal data which we hold about needs to be corrected or updated
- **the right to object to processing:** you have the right to object to us processing your personal data in certain circumstances
- **the right to be forgotten (erasure):** in certain circumstances you can ask us to delete the personal data which we hold about you
- **the right to data portability:** you can ask us to transfer the personal data that we hold about you to other organisations, in certain circumstances
- **the rights to restrict processing:** in certain circumstances you have a right to restrict us processing your personal data
- **Right to object to us making a decision about you based solely on automated processing,** including profiling in certain circumstances

When you make a request, we are required to verify your identity and may ask you for specific information to fulfil this purpose. Normally, you will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

If you wish to exercise your right to access your information, or any other right, please see the contact details at the bottom for more information.

### **Change to this notice**

From time to time, we will need to make amendments to this privacy notice, which we will do by publishing a new version on our website.

### **Queries and Complaints**

If you wish to exercise any of your rights as a data subject, want clarification on any queries you have, or wish to make a complaint, please contact us at [info@thinklikeapony.co.uk](mailto:info@thinklikeapony.co.uk) or by telephoning 07912 784193 or 07701 290361.

Any concerns will be raised with Jackie Michaels as the person responsible (the 'Responsible Person') for data protection at TLAP.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Telephone: 0303 123 1113

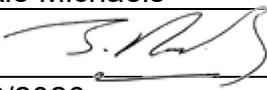
Online: <https://ico.org.uk/make-a-complaint>

We keep this privacy notice under regular review and will place any updates on this website.

This Privacy Notice was last updated on 10/06/2024

The information below this line should not be published on the website.

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