



Diverse Cymru Privacy Notice to Website Visitors

This privacy policy explains how personal data is collected and used when you use our websites. It also explains how we process any data that you supply to us on this website, for instance to request a quote or to use our online services.

Diverse Cymru is the Data Controller for any personal data that you supply to us as part of the services you are contracted to receive from us. As our client, you are our data subject.

Our address is:

307-315 Cowbridge Road East, Cardiff, CF5 1JD

Telephone: 029 20 368888

Email: info@diverse.cymru

The Organisation has a Data Protection Officer, who can be contacted at:

andew.sanders@diverse.cymru

or you can write to:

Andrew Sanders, Software Developer and Sales Manager, Diverse Cymru, 307-315 Cowbridge Road East, Cardiff, CF5 1JD

Please copy all requests to our Compliance Officer, who can be contacted at:

dawn.sanders@diverse.cymru

STATUS	AUTHOR	APPROVED BY	DATE APPROVED	REVIEW DATE
Draft	Jyoti Preet-Ryatt	WJS, COO	04 05 2018	03 05 2021
Revised	Bill Smale		23 08 2018	22 08 2021
Revised	Jyoti Preet-Ryatt	WJS, CEO	12 06 2019	11 06 2022

or you can write to:

Dawn Ashton, Advocacy and Advice Manager, Diverse Cymru, 307-315 Cowbridge Road East, Cardiff, CF5 1JD

What personal data we collect

The personal data collected depends on how you use our website. You can browse the site, you can fill in forms on the website to request information or quotes from us, download documents from us, or you can subscribe to our emails, and other activities. The Organisation's websites collect personal data to provide these services.

We collect information about you when you instruct us to provide advice; visit our website; subscribe to our newsletters or to receive our publications; apply for employment with us; attend one of our seminars; and engage in business dealings with us.

What we do with your personal data

When you visit our website, a record of your visit is made. This data includes your device's IP address. That data is used completely anonymously, in order to determine the number of people who visit our website and the most frequently used sections of the site. This enables us to continually update and refine the site. If you use any forms on the website to send an email to us, a record will also be made of your email address and your telephone number.

The following table sets out how we handle your personal data and our legal basis for doing so under GDPR and the Data Protection Act 2018.

What we do	Our legal basis under GDPR
Use the personal data that you provide on our web forms and questionnaires	Article 6(1)(b) – when you provide us with your personal data, for instance to obtain a quote for our services, this is a necessary step to take at the request of the data subject prior to entering into a contract
Provide our core services of health and safety, employment law advice, employment documentation and legal services	Article 6(1)(b) – this is necessary for the performance of a contract with you, our data subject

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Provide our online services platforms – [My HR Toolkit]	Article 6(1)(b) – this is necessary for the performance of a contract with you, our data subject
Contact you regarding the services we provide	Article 6(1)(f) – we need to contact you for our legitimate interests so that we can gather more information for the provision of our services, or to deliver those services most effectively
Retain your data under our data retention policy after your contract has expired	Article 6(1)(f) – we need to retain your personal data for only as long as necessary under the law to protect our legitimate interests
Where you require us to make Reasonable Adjustments to enable you to attend a meeting or interview, we may require further information from you.	Article 9(2)(a) of GDPR (explicit consent). If this includes information about your physical or mental health, such information (being sensitive personal data, Special Category data), will only be used by us, with your explicit consent, to assess your eligibility for Reasonable Adjustments. We will not share or disclose it to others. You can withdraw your consent as anytime by contacting us. Please note that we may not be able to process your request for Reasonable Adjustments if you do this.

The following table sets out the categories of personal data that we obtain.

Personal Data	Explanation
Name, postal address, email address, website, identification number, location data, online identifier – these are classed as personal data	This data is provided by you on our web forms and questionnaires, either to obtain a quote from us, subscribe to one of our newsletters, request a service from us or as part of the provision of your existing contractual services. This data may be provided if you apply for a job opportunity in the Organisation.
Special categories of personal data are racial or ethnic origin, political opinions, sex life, sexual orientation, religious or	This data is provided by you on our web forms and questionnaires, most regularly in relation to the utilisation of our Health

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philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying a natural person, or data concerning health	Assured service, EAP service, or is provided when seeking advice and support from our employment advice, employment consultancy, Diverse Cymru Face2Face and legal services.
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We may collect, hold, use and disclose the information collected to compile statistical data and to; maintain our database; develop/improve our website; respond to any email enquiries; notify you of any upcoming marketing, training or other events that you have opted in to; provide you with publications; manage quality control; manage systems administration; attend to compliance issues; provide you or your organisation with advice and determine suitability for employment.

We will not use or disclose your personal information for any other purpose which is not related (or in the case of sensitive information, directly related) to the above purposes without your consent unless otherwise authorised, required or permitted under the laws of England and Wales. The Organisation does not sell your data to third parties.

If you no longer wish to receive information about our services, please send an email to our Organisation Data Protection and Compliance Officer (gdpr@Diverse Cymru-uk.com) advising that you do not wish to receive further information.

Will we disclose your data?

Personal data will only be disclosed on a confidential basis to external service providers so that they can provide services such as financial or administrative services in connection with the operation of our business; and to any person (where necessary) in connection with their services, such as law enforcement, regulatory authorities, partners or advisors; or to companies within the Diverse Cymru Organisation in the UK.

The handling of these operations is governed by a data processing contract between us and our external service provider, ensuring a commitment to the principals of the GDPR and the Data Protection Act 2018. We ensure external service providers are only authorised to use personal data for the limited purposes specified in our agreement with them.

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How long we keep your personal data

Personal data from our data subjects is retained in line with our data retention policy. The Organisation keeps most data for 7 years, which covers the 6 years by law in which we have to keep certain information for a minimum of 6 years plus the current year. Personal data that is no longer necessary to be kept under the Organisation's data retention policy will be deleted. Under the Organisation's data retention policy, there are certain exemptions in relation to financial data and health data. A copy of the Organisation's data retention policy can be made available upon request.

Your Rights

You have the following rights in relation to personal data held on you by the Organisation:

- The right to be informed about how personal data is used – (this notice)
- The right to access a copy of personal data that the Organisation holds about you
- The right to rectification of any errors in personal data held by the Organisation
- The right to erasure of any personal data
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making including profiling

If you wish to learn more about these rights and how they operate, please look at the ICO's website <https://ico.org.uk/for-the-public/>.

The Organisation does not operate any automated decision making systems.

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You have a right to request a copy of the personal data that we hold about you. If you would like a copy of some or all of your personal data please email andrew.sanders@diverse.cymru or write to our Data Compliance Officer at 307-315 Cowbridge Road East, Cardiff, CF5 1JD. Proof of your identity will be required for security purposes.

If you are unhappy with the response that you receive from us when you exercise your GDPR rights or Data Protection Act 2018 rights, you have the right to lodge a complaint to the ICO. More guidance about raising a complaint with us is available on the ICO's website <https://ico.org.uk/for-the-public/raising-concerns/> and for raising a complaint with the ICO, more information is available on <https://ico.org.uk/concerns/>.

Cookies

This website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of this website and compile reports for us on activity on the website. Google stores the information collected by the cookie on servers in the United States and the transfer of the data to servers in the USA is governed by the EU-US Privacy Shield framework. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. More information about Google's compliance with GDPR can be obtained from their website <https://privacy.google.com/businesses/compliance>.

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Other websites

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Our website may contain links to other sites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policy.

How to contact us

Please review the website regularly as this statement may change from time to time. If you have any questions about our privacy policy or information we hold about you please contact:

Organisation Data Protection Officer: Andrew Sanders, Software and Sales Manager

Telephone: 029 2036 8883

Email: andrew.sanders@diverse.cymru

Compliance Officer: Dawn Ashton, Advice & Advocacy Manager

Telephone: 029 20 368886

Email: dawn.ashton@diverse.cymru

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