



SWRLS PRIVACY POLICY

This page explains what information we may collect about you, how and why we may keep and process this information, including circumstances in which we may share it with third parties, and how you can ask us to amend or remove from our records any information we hold about you. This page also relates to circumstances in which we may receive personal data about you from third parties.

What This Covers

SWRLS CIO is committed to protecting all personal information you may share with us as:

- a member of our organisation
- a ticket buyer for a SWRLS event
- a training seminar or workshop participant
- registered with us to receive our newsletters
- applying to us to work as a freelance consultant
- working with us as a freelance consultant
- applying to us for a grant
- as a SWRLS Grant Recipient

- applying to us for a SWRLS Award
- as a SWRLS Award recipient
- as a partner or participant in a SWRLS Project, externally funded
- trustee of SWRLS

Who We Are

South Western Regional Library Services (SWRLS) is a membership organisation and a registered charity, number 1176414. Our members are libraries across the sector and across the region of the South West of England and the Channel Islands. Our mission is to support and advocate for libraries and to promote cooperation between libraries across the sector in our region. SWRLS supports our member in five main areas: networking, workforce development and training, grants, strategic partnerships and interlibrary loans.

What is Personal Information?

Personal information is any data which can be used to identify an individual. It may include your name, address, email address, phone numbers (landline and mobile), banking details, purchasing history, correspondence (including records of telephone conversations and text messages), photos, video footage, podcasts, press briefings, CCTV records. It does not include information which has been anonymised.

Why We Hold and Process Personal Information

General Data Protection Regulation (GDPR) sets out six headings under which organisations are entitled to store and process personal information. Processing information means the way we use it. These are:

- **Consent:** when you have given clear consent for us to process your personal data for a specific purpose. Consent will not be assumed from a failure to opt out but only on the basis of positively opting in, for example to receive our newsletters or be included on our mailing list for events.

- **Contract:** the processing is necessary for a contract we have with you, or because we need to take specific steps before entering into a contract with you. This may include an agreement to purchase tickets for an event, or to receive a SWRLS Grant from us for which you have applied according to our criteria for grants and awards.
- **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations). This might include keeping freelance consultant records for the minimum periods of time required by employment or health and safety legislation.
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for the legitimate interests of our business, or the legitimate interests of a third party unless there is a good reason to protect your data which overrides those legitimate interests. This could include statistical reporting to our funders or sharing information with previous employers to obtain references.

Where Do We Collect Personal Information From?

Information you give to us:

- When you apply for tickets or training workshop places
- When you apply for a SWRLS Grant or a SWRLS Award
- When you request to join our mailing lists
- When you email us
- When we speak to you on the phone
- When we meet with you online (via Zoom)

- When you complete feedback surveys and give us your contact details
- When you use our website, we automatically collect information from your browser. This information includes your IP address, your browser type and language, access times, the contents of any undeleted cookies* that your browser previously accepted from us and the referring website.
- When you apply to us for a trustee position or enter into a freelance contract with us

Data we collect from carefully chosen third parties:

- Social media, including Facebook, X(Twitter), Instagram. Please note that information shared on social media is covered by the privacy policies of those platforms and not by ours.
- Zoom – for setting up and establishing online meetings. Zoom’s Privacy Policy can be found [here](#).
- Basecamp – for communicating across the membership and individually in the normal course of business. Basecamp’s Privacy Policy can be found [here](#).
- Crowdcast – when you register for an online tour event, such as Word Live in Libraries, your email address is used to register you for the event. Crowdcast’s Privacy policy is [here](#).
- Eventbrite – when you book tickets with us for training or SWRLS events such as our Members Day and AGM, your email address is used to register you for the event. Eventbrite’s Privacy policy is [here](#).
- Ticketsource – when you book tickets with us for Word Live in Libraries and other literary events, your details are used to create a customer record. Ticketsource’s Privacy Policy is [here](#).
- Our website contains links to various third party websites. If you click on a third party link, please note you are then covered by their privacy notices.
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How Do We Use Your Personal Information?

- To manage your membership and provide you with regular information
- To carry out research and analysis about your use of, or interest in, our products and services
- To communicate with you by email, postal mail, telephone and/or mobile devices
- With your explicit consent, we may send you information about our own products and services, or those of third parties we think may be of interest to you. If you do not consent to such contact, we will not undertake it.
- To develop and display content and advertising tailored to your interests on our site and other sites. Advertising content will only be delivered with your explicit consent.
- To pursue our legitimate business interests
- To carry out a contract we have entered into with you
- To carry out a grant agreement we have entered into with you
- For statutory purposes
- For your vital interests

What Personal Information Do We Share?

We may share any personal data necessary to fulfil our legal and contractual obligations and to protect your health and safety. This may include sharing information with statutory bodies, health services, our funders and other organisations we work with. If the information we hold about you is not required for legal or contractual purposes, or for your health and safety, we will not share it without your explicit consent to do so.

We take all reasonable steps to ensure that any third parties with whom we share your information store and process that data in accordance with the GDPR. However, you should be aware that, when they are processing your data, their own policies and procedures apply rather than ours.

How Long Do We Keep Your Information For?

- We only hold your information for as long as we do the activities we told you about
- We think about what type of information it is, the amount collected, how sensitive it might be and any legal requirements
- We design our services so that we don't hold your information any longer than we have to
- We always think about the potential risk from anyone using or sharing this information without permission

How Do We Protect Your Information?

- Information required for legal or contractual purposes may be kept either as a soft copy on our secure server and/or as a hard copy filed in our office in a key-access cupboard. Soft copy files are password protected and access to the cupboard is only granted to those staff members who have a legitimate reason to process your data.
- Our ticketing and sales are processed by Eventbrite and Ticketsource which are widely used and each has a policy to protect your personal data.
- Financial information you share with us when purchasing our services is not stored by us but is processed by Eventbrite and/or Ticketsource.
- While we cannot guarantee the security of the internet, our website has security measures in place to protect against the loss, misuse or alteration of the information you provide to us through it. However, you should bear in mind that the security of information you share with us via social media is the responsibility of the relevant social media organisations rather than ourselves.

Cookies

The use of cookies on this website

Most websites use cookies to carry out a range of useful activities. Cookies are small files that are installed to your computer. For example, cookies are used when you are shopping on the web so that the website remembers what you are doing e.g. what's in your shopping basket as you move between pages.

This website and its operators are committed to providing the best user experience and to do this, we collect data upon how you use and find the website. Cookies are installed by the website to your computer. These cookies do not collect or hold any personal data and the information gleaned is anonymous.

How do we use cookies?

Data collected is used to gauge how our website users use and find our website. We do not use cookies to collect personal data.

How do I opt out of this?

You can use your browser, usually under the tools menu, to turn off the option to install cookies on your computer. This will turn off the right for a browser to install cookies on your computer from ALL websites and will break the operation of some of these websites. You can change this and allow the use of the cookies after you have set the option to no. Visit [About Cookies](#) for a more detailed explanation.

Your Rights

Under the GDPR, you have the right to:

- Access to your personal information

- Request updates or alterations to information which is incorrect
- Request the partial or complete removal of the information we hold on you, though you should be aware that this may not always be possible in the case of data we hold for contractual or statutory purposes, or in the legitimate interests of our business

If you wish to make an access request, or request that your personal information be updated or removed from our records, or if you have any queries about the way we process your data, please contact us at Coordinator1@swrls.org.uk

Changes to This Notice

SWRLS CIO may update this Privacy Notice at any time, without prior notice. The latest version will always be available on our website.

LAST UPDATED: October 2023