



Facework Group (CIC)
Community Interest Company

FACEWORK GROUP CIC GDPR PRIVACY POLICY

DEFINITIONS

Facework Group CIC means the Facework Community Interest Company registered in the UK under the Companies Act of 2006 with the **Office of the Regulator of Community Interest Companies** and **Company House** registration number Company Number 12598896.

Facework runs various programmes including Hatcham House Community Workspace in London, Facework Employability Training programmes in the UK and elsewhere, Consultancy Services and the creation of education and training resources. See www.facework.online

The registered address for the company is 26, Musgrove Road, London SE14 5PW and the Founding Director of the company is Stephen Carrick-Davies.

Facework is registered with the **Information Commissioner's Office** in the UK – reference number ZA935728. This registration is renewed annually in March of each year.

This Policy "A Privacy Policy is a statement that declares a firm's or website's policy on collecting and releasing information about a visitor. It usually declares what specific information is collected and whether it is kept confidential or shared with or sold to other firms, researchers or sellers."

GDPR: General Data Protection Regulation Act.

Data Controller: Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the way any personal information are, or are to be, processed.

Data Processor: Data Processor means any natural or legal person who processes the data on behalf of the Data Controller. Data Processors may be in third party companies.

Data Subject: Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Data Handler: We list in this policy the 3rd party organisations who may hold data on you as you use their services whilst interacting with Facework Group CIC businesses.

Contact Information: We want all our users to be able to get in touch quickly and easily if they have any questions or concerns about the use of their personal data. This person is the Data Controller who is Stephen Carrick-Davies. You can contact him at Stephen@facework.today or phone 0771 245 1859

1. FACEWORK'S PRINCIPLES FOR PROCESSING PERSONAL DATA

Our principles for processing personal data are:

- **Fairness and lawfulness.** When we process personal data, the individual rights of the Data Subjects must be protected. All personal data must be collected and processed in a legal and fair manner.
- **Restricted to a specific purpose.** The personal data of Data Subject must be processed only for specific purposes.
- **Transparency.** The Data Subject must be informed of how his/her data is being collected, processed, and used.

2. WHAT PERSONAL DATA WE COLLECT AND PROCESS

Facework Group CIC collects several different types of personal data for various purposes and through various projects the Social Enterprise runs. These include Hatcham House Community Workspace, Facework Employability Training Programmes in the UK and abroad.

Personal Data may include, but is not limited to:

- First name and last name,
- Phone number, Email address, Address, City, Postcode,
- Program enrolment or Program registration date
- Reporting classifications (e.g., at which branch location you are employed)
- Eligibility starts and end date data (if relevant)
- Cookies (see separate Cookie's policy)
- Log data including IP address.
- Answers to questionnaires from Facework Surveys or feedback you give.
- Program engagement information
- Reward partner engagement if authorized.
- Details of credits you have been awarded or certification earned.
- Financial information such as transactions and payment details including information provided through authorised third parties (for example payment systems)

3. HOW IS YOUR PERSONAL INFORMATION GIVEN TO US?

- **From you:** As part of your eligibility for Programs or services we run you will have supplied your information. This information is necessary to verify your identity when you register for our programmes or services. If prospective members or users of our services do not want Facework to receive this information this will result in you being ineligible to participate in a Facework program or service.
- **From your device or an authorised third parties on behalf of Facework,** for example if you use the Hatcham House App or make payment via STRIPE or SUM-UP Facework will receive information about your participation with third-party service providers. You can modify these permissions at any time through the settings menu of the applicable application.
- **Additionally,** if you engage with Facework's programme or services through a social media platform, Facework may respond or contact you through the applicable social media platform.

4. HOW WE USE THE PERSONAL DATA

Facework Group CIC uses the collected personal data for various purposes:

- To provide members or participants of our programmes with services
- To notify you about changes to our services and/or products
- To provide customer support
- To gather analysis or valuable information so that we can improve our services.
- To detect, prevent and address technical issues.
- To sell various services or resources to participants.

5 LEGAL BASIS FOR COLLECTING AND PROCESSING PERSONAL DATA

Facework's legal basis for collecting and using the personal data described in this Data Protection Policy depends on the personal data we collect and the specific context in which we collect the information:

Facework needs to perform a contract with you this includes:

- You have given Facework permission to do so and process your personal data is in Facework's legitimate interests. For example, **resolve any complaints or inquiries you may have**, fulfilling purchase orders you make through the Program, Tracking your progress through the Program etc.
- Facework needs to comply with the law.

Facework may also seek to use your Personal Information in a way not described above, such as in using a testimonial you have written on our website or in our marketing materials. Before using your Personal Information in this way, Facework will first seek your voluntary and explicit consent including use of photograph or illustration.

6 RETENTION OF PERSONAL DATA

- Facework will retain your personal information only for as long as is necessary for the purposes set out in this Data Protection Policy.
- Facework will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.
- We will hold this information safely either in paper form (for example completion of daily Track and Trace information during COVID) or electronically.
- Facework recognises that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee absolute security.
- We follow generally accepted industry standards to protect the Personal Information we receive, both during transmission and upon receipt.

7 OUTSIDE OF FACEWORK WE SHARE PERSONAL INFORMATION WITH:

Facework will never sell, rent, or lease your Personal Information.

However, there are instances when Facework may disclose your personal information to our agents, third-party partners, affiliates, and subsidiaries to enable them to perform functions on our behalf. These service providers are only permitted to share, store and/or use Personal Information for contracted business purposes. We will only deal with third parties who have strict published privacy policies: These companies are Data Processors of Service Providers to Facework **Currently these service providers include:**

Provider	What's Shared	Purpose
andCards	Membership details including usage and interactions with Facework through the app. See their privacy policy at https://www.andcards.com/privacy/	Andcards has developed the APP which we use to register members at Hatcham House.
SUM-UP	Payment information for purchases at Facework operations. See their privacy policy at https://sumup.co.uk/privacy/	We use Sum-Up for users to make payments for services and purchase at Facework places of operation.
Stripe	Workspace Provider address and payment information at: https://stripe.com/gb/privacy	We use Stripe to process payment for services through the APP.
Wix	Customers interact with the WIX website to contact us see privacy policy at https://www.wix.com/about/privacy	We offer a 'Chat and message function through our Facework and HH websites which are run through WIX.

Additionally, Facework may share your Personal Information when we believe that such action is necessary to:

- Fulfil an enforceable government request.
- Conform with the requirements of the law or legal process!
- Protect or defend Our legal rights or property, Our Websites or Applications, or other users; or
- Protect your health and safety or the health and safety of this website's users or the general public.
- Pass on CCTV footage from recording in our premises should Law Enforcement or Licensing need to access it. (Signage that we record through CCTV is made clear at all Facework centres).

8 CHILDREN'S PERSONAL INFORMATION

Facework does not knowingly collect personal information from children under 16 years old (or older, if applicable law provides for different protections). If we become aware that a child has submitted information to the Company, we delete this information immediately. We encourage parents to instruct their children to never give out their real names, addresses, or phone numbers, without permission, when using the Internet.

9 DATA PROTECTION RIGHTS

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what personal data, we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you.
- The right of rectification
- The right to object

- The right of restriction
- The right to data portability
- The right to withdraw consent.
- The right to be informed.
- The right of access
- The right to erasure
- The right to object

If you do not want us to process your data anymore, please contact us at 0771245 1859 or send us mail to: stephen@facework.today

10 COOKIES

A cookie is a file containing an identifier that is automatically sent by Us to your browser or mobile device and is stored by the browser or mobile device. The identifier is then sent back to the server each time the browser or device requests a page from the server. This information might be about you, your preferences or your device and is mostly used to make the Website or Application work as you expect it to. The information does not usually directly identify you, but it can give you a more personalized experience.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Facework uses different categories of cookies for certain purposes:

- *Strictly Necessary:* These cookies are necessary for the Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling out forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not work. These cookies do not store any personally identifiable information.
- *Performance:* These cookies allow Us to count visits and traffic sources so We can measure and improve the performance of Our site. They help us to know which pages are the most and least popular and see how users move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited Our Website and will not be able to monitor its performance.
- *Functional:* These cookies enable the Website to provide enhanced functionality and personalization. If you do not allow these cookies, then some or all these services may not function properly.
- *Cookies used by our third-party service providers:* We use Google Analytics to analyse the use of website and create reports about the use of our website and app. Additionally, We the Wix website (platform which hosts and gives us the tools to create the website assist us in determining from where our website is being accessed from.

You can find more information about cookies in general by visiting www.allaboutcookies.org including how to disable certain cookies. If you use different computers or devices to access the Websites, you will need to ensure that each browser is adjusted to suit your cookie preferences. If you restrict Our Websites and Applications from setting cookies, you may worsen your overall user experience and/or lose the ability to access the Programs. Doing so may also stop you from saving customized settings.

11 HOW WILL I KNOW IF THIS PRIVACY NOTICE CHANGES?

Facework reserves the right to update this Privacy Notice from time to time. If We decide to change this website's privacy policies, we will post those changes to this Privacy Notice, the homepage, and other places that we deem appropriate so that you are aware of what information is being collected, how the information is being used, and under what circumstances, if any, the information may be disclosed.

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