

# Privacy notice

#### 1. STATEMENT

Our privacy notice relates to the way we manage information relating to individuals shared with Kindred by member and prospective member organisations. Whilst Kindred only has a relationship with member organisations, we want to be open and transparent with anyone who may have had their data shared with Kindred.

# 2. WHAT/ WHO IS KINDRED?

Kindred connects, supports and harnesses local entrepreneurialism for social good. We are a CIC, owned by our members, offering hands-on, peer-to-peer support, learning and money. We are a collaborative network of socially-trading organisations, providing support tailored to grow our individual and collective social impact.

Kindred LCR is a Community Interest Company, registered number **12744343**. Our ICO registration number is **ZB037089**.

In order to provide support and investment to local socially-trading organisations (STOs) we capture personal data about individuals that hold influential positions within the STO.

#### 3. WHAT INFORMATION DO WE HOLD?

We gather a full set of contact details for individuals and information relating to their relationship with the STO.

We also capture a range of documentation and information relating to the STO, which may, depending upon the role of individuals, include additional information about them.



#### 4. HOW WE COLLECT YOUR DATA

We collect data from via the Kindred legal member application form, and via our sign-up, for members of the wider Kindred movement. This may be directly shared with Kindred, via the website – or as part of an event hosted by an organisation delivering services on Kindred's behalf.

Where a partner organisation is involved there will be a formal agreement between Kindred and the partner to guide how we capture and share information, ensuring that only essential information is involved. This agreement is reviewed regularly.

#### 5. HOW WE STORE AND PROTECT YOUR DATA

Data is stored in a restricted secure cloud-based location, accessible only by Kindred staff and their contractors. All contractors follow the Kindred Data Protection Policy and do not access the information outside their normal duties.

#### 6. HOW THE DATA IS USED

The data is used to review and process the STO application, the investment process and the subsequent monitoring activity. We may also use the data to ensure that the member STO has the opportunity to participate fully in the community which involve communication via a variety of means.

As part of our operations, we may need to share information with a small number of our suppliers in order to facilitate events etc. Where this is necessary there will be a data sharing agreement in place to define how this take place.

#### 7. LEGAL BASIS

We are using consent as a legal basis for holding and processing individuals' data and require the relevant STO to confirm that positive consent has been provided prior to personal data being shared with Kindred.



# 8. OPTING OUT OF THE USE OF PERSONAL INFORMATION

Individuals have the right to opt out of Kindred receiving their information – this can be done by contacting Kindred at DataProtection@Kindred-Icr.co.uk.

# 9. ACCESSING INFORMATION OR FURTHER QUERIES

Individuals have the right to see and access the information that is held about them. You can direct a request to Kindred at DataProtection@Kindred-lcr.co.uk.

Further information and independent advice can be found on the Information Commissioner's website.

# 10. DATA RETENTION

Data relating to individuals actively connected with an STO will be retained as long as the relationship with Kindred continues. After the relationship with Kindred ends, the information will be kept for seven years where an investment has been made, or two years otherwise.

# This policy has been approved and authorised by:

Name: Kindred Interim Board

Position: X

Date: 15/06/2021

Policy Name	Version	Developed by	Amended γ/n	Review Date
Data Protection Pollicy	1	DC	n/a	15/06/22