

Privacy Policy Notice

The policy: This privacy policy notice is for this website; (nwttdt.com & pathwaysassociates.co.uk) and served by Pathways Associates CIC and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

Policy key definitions:

"I", "our", "us", or "we" refer to the business, [NWTDT, Pathways Associates CIC, My Life My Way].

"you", "the user" refer to the person(s) using this website.

GDPR means General Data Protection Act.

PECR means Privacy & Electronic Communications Regulation.

ICO means Information Commissioner's Office.

Cookies mean small files stored on a users computer or device.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

We are exempt from registration in the ICO Data Protection Register because we are a not for profit organisation.

Lawful basis: Consent

The reason we use this basis: For Mailing Lists that you are interested in receiving, and for being a Pathways Member

We process your information in the following ways: Your email and (in the case of Pathways Members only) your postal address is stored in a secure cloud based system, a world class company known as "Mailchimp"

Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.

Sharing your information: We do not share your information with third parties. Ever.

Lawful basis: Contract

The reason we use this basis: If you are employed by us or have a contract of work with us.

We process your information in the following ways: Information about you and the work you do for us is stored electronically on encrypted devices and ensured safe through constant system monitoring and offsite GDPR compliant backup systems

Data retention period: We shall continue to process your information until the contract between us ends or is terminated under any contract terms.

Sharing your information: We do not share your information with third parties.

Lawful basis: Legal obligation

The reason we use this basis: If you are a director or Trustee of our Organisations

We process your information in the following ways: A local register is stored electronically on Encrypted devices

Data retention period: Until you are no longer and director or trustee

Sharing your information: We do not share your information with third parties.

Lawful basis: Legitimate interests

The reason we use this basis: If it is in your interest and, mutually, ours to store data about you. A full list can be requested any time. In all cases the data stored you have given to us in order for the employee to contact you.

We process your information in the following ways: We access your data on encrypted devices, and store the data on encrypted and password, Two Factor Authentication Cloud storage accounts.

Data retention period: #

Sharing your information: We do not share your information with third parties.

Lawful basis: Criminal offence data

The reason we use this basis: If you work for us and you will be meeting some of our end clients and service users.

We process your information in the following ways: We will request and keep on record a DBS check provided by a third party DBS Check solutions provider.

Data retention period: 36 Months (3 Years)

Sharing your information: We do not share your information with third parties.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

Your individual rights

Under the GDPR your rights are as follows. You can read more about your rights in details below, which give you:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR. Please email info@pathwaysassociates.co.uk for any SARs and you will be contacted within 72 hours.

Internet cookies

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Transparent Privacy Explanations

We have provided some further explanations about user privacy and the way we use this website to help promote

a transparent and honest user privacy methodology.

Email marketing messages & subscription

Under the GDPR we use the consent & legitimate interest lawful basis' for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also unsubscribe from all MailChimp lists, by following this link, otherwise contact the EMS provider.

Our EMS provider is; "Mailchimp". We hold the following information about you within our EMS system;

Email address

I.P address

Subscription time & date

Your Name

Resources & further information

Overview of the GDPR - General Data Protection Regulation

Data Protection Act 1998

Privacy and Electronic Communications Regulations 2003

The Guide to the PECR 2003

Twitter Privacy Policy

Facebook Privacy Policy

Google Privacy Policy

Linkedin Privacy Policy

Mailchimp Privacy Policy