Privacy Notice for Bright Options Training sessions

This Privacy Notice explains how Bright Options will use your personal information, who it will be shared with, and why. Your personal data is defined as any information that can directly or indirectly identify you. This notice explains how we keep your data safe and secure and includes information you need to know about your rights and how to exercise them.

1. What information do we collect?

- Your name (Personal data)
- Your email address (personal data)
- A visual and audio recording of the event (Personal data)
- Your Job role (Identifiable data)
- Your organisation (Identifiable data)

1.2 Why do we collect information about you?

Bright Options training sessions may be audio and visually recorded and shared externally via the Bright Options website and stored on the Bright Options SharePoint. Bright Options will endeavor to only record the section of the session where speakers are presenting unless it is necessary for the session, for example if it is designed to be more interactive.

Details of whether the session will be recorded can be found on the Eventbrite page on sign up and will be clearly advertised. If you are an attendee at the event, your name and image will show on the recording and anyone else who chooses to speak whilst the recording is taking place will also have their image and name recorded. To avoid this, you should turn off your camera and not speak while recording is in progress.

During the recording, you may choose to disclose your current job role and/or organisation you work for. This is all considered to be personal and identifiable data.

Bright Options also collects your job role, organisation name, full name and email address to populate a register. This register allows us to inform trainers and facilitators about the number of attendees and variety of roles so that they can tailor sessions to participants. It also aids us with reporting and evidencing the need for future sessions.

To collect and process your personal information, Bright Options needs a lawful basis for processing. Under the GDPR, to record the session, we will be relying on legitimate interest as a lawful basis.

Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. Whenever we use Legitimate Interest to process data, we perform a Legitimate Interest Balancing Assessment (LIA) to enable us to consider any potential impact on you (both positive and negative), and your rights under data protection laws. Your information will not be processed if our interests as a charity override your fundamental rights and freedoms according to the law.

Although we do not plan to collect any special category data, this may be disclosed by participants during the course of the session. Therefore, Bright Options will be using the following lawful basis for the processing of special category data:

Consent: clear, informed consent has been freely provided for a specific purpose by statement or by a clear affirmative action which signifies agreement to the processing of data.

Following the session, if recording has taken place, the audio and visual recording will be uploaded to Vimeo. Vimeo has US data-based servers. This is known as an 'International data transfer'. Subsequently, we will be relying on the following exemption as set out in Article 49 of the UK GDPR:

- *Explicit consent of the person the transferring data is about.*

Prior to the session, we will obtain your consent to upload the recording to the website via Eventbrite. We will also remind you at the beginning of the session and anyone who did not sign up through Eventbrite will be asked for their consent during the session. A written record of consent will be stored on SharePoint; however, you can withdraw consent prior to and post event by contacting us at enquires@brightoptions.org.uk

Once the recording has been uploaded to a third-party hosting website such as Vimeo, the recording will also be added to the restricted area of Bright Options website.

Following the session, you will be contacted via email to receive any post session materials such as the PowerPoint slides and further resources.

You will also be invited to participate in a feedback survey via SurveyMonkey/Air table. This survey asks if you would like to be informed of future sessions. If you consent to this, your details will be added to a mailing list, and you will be contacted about opportunities for upcoming training sessions. For a full breakdown of the different types of information we collect and the lawful basis for processing please speak to us by emailing enquires@brightoptions.org.uk

1.3 What do we do with your information

All of the information you provide will be held securely by Bright Options on both SharePoint and on the Bright Options restricted website, accessible only to those who have a password and work for Bright Options or one of our customers who have paid to review the recordings. Further details on the information we share and who we share it with are detailed in section 1.4.

The recording may also be uploaded to Vimeo for sharing purposes (servers based in the US). You can view Vimeo's Privacy Policy here: https://vimeo.com/privacy#with_whom_we_share_your_data

Electronic information is stored on Microsoft SharePoint, Google Drive, and/or local machines.

Bright Options is registered with the Information Commissioners Office and certified under the Cyber Essentials scheme, for more information please visit https://www.cyberessentials.ncsc.gov.uk/ or contact enquires@brightoptions.org.uk for a copy of our certification.

1.4 Who do we share your information with

Your personal data which has been collected via the audio and visual recording of the training session will be shared on our website, and accessible externally for persons/organisations to access the recording post event. Information collected for registration and reporting processes is not shared outside of the organisation.

1.5 How long will we store your information

We will keep any identifiable information about you for a maximum of 6 years. For more information, please contact enquires@brightoptions.org.uk to request a copy of our Confidentiality, Data Protection, and Information Sharing Policy.

We also keep a Record of Processing Activities (RoPA) which maps out where the information is stored, how long it is kept for, and when it is deleted from our systems.

1.6 What are your rights

You have the right to:

- Ask to see the information about you that is held by Bright Options (also known as a Subject Access Request)
- Have information about you changed if it is not correct
- Limit the way we use your data
- Question decisions made about you by a computer
- Submit a complaint
- Ask for us to delete some or all your information we hold about you (subject to our contractual and/or legal obligations)
- Have your information transferred to you or a third party in a structured, commonly used, electronic form so it can be easily transferred.
- Restrict the processing of some or all your information if it is deemed to be inaccurate, or we are not lawfully allowed to use it. To exercise any of these rights please contact the GDPR leads via enquires@brightoptions.org.uk.

1.7 Complaints

If you are unhappy with the way your request is handled or disagree with a decision made by Bright Options regarding your data, you can submit a complaint. In these circumstances, you can contact us at Bright Options and request a review of the decision by emailing enquires@brightoptions.org.uk.

If you are not satisfied with any outcome from the Bright Options team, you may wish to apply to the **Information Commissioners Office** at:

The Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate)