

Data Protection Policy

1) Introduction to the UK-GDPR

Under the United Kingdom General Data Protection Regulations (UKGDPR) Orinoco is required to comply with the UK-GDPR and undertakes to do so.

2) Definitions

Data Subject: A data subject is an identifiable individual person about whom Orinoco holds personal data.

Contact Information: For the purposes of this Policy, “Contact Information” means any or all of the person’s:

- full name (including any preferences about how they like to be called)
- full postal address
- telephone and/or mobile number(s)
- e-mail address(es)
- social media IDs/UserNames (eg Facebook, WhatsApp).

3) Principles of the UK-GDPR

Orinoco will ensure that all the personal data it holds will be:

- processed lawfully, fairly and in a transparent manner
- collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up-to-date; every reasonable step will be taken to ensure that inaccurate personal data is erased or rectified without delay
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4) Lawful Processing

Orinoco will obtain, hold and process all personal data in accordance with the UK-GDPR for the following lawful purposes. In all cases the information collected, held and processed will include Contact Information (as defined in 2) above).

4.1 By Consent

People who are interested in and wish to be kept informed of Orinoco’s activities.

- a) Subject to the person's consent, this may include information selected and forwarded by Orinoco on relevant activities by other organisations. **Note:** this will **not** involve providing the person's personal data to another organisation
- b) The information collected may additionally contain details of any particular areas of interest about which the person wishes to be kept informed
- c) The information provided will be held and processed solely for the purpose of providing the information requested by the person.

4.2 By Contract

People who sell goods and/or services to, and/or purchase goods and/or services from Orinoco. The information collected will additionally contain details of:

- a) The goods/services being sold to, or purchased from Orinoco
- b) Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from Orinoco.

The information provided will be held and processed solely for the purpose of managing the contract between Orinoco and the person for the supply or purchase of goods/services.

4.3 By Legal Obligation

People where Orinoco has a legal obligation to collect, process and share information with a third party – eg the legal obligations to collect, process and share with HM Revenue & Customs payroll information on Orinoco employees.

The information provided will be held, processed and shared with others solely for the purpose meeting Orinoco's legal obligations.

4.4 By Vital Interest

Orinoco undertakes no activities which require the collection, holding and/or processing of personal information for reasons of vital interest.

4.5 By Public Task

Orinoco undertakes no public tasks which require the collection, holding and/or processing of personal information.

4.6 Legitimate Interest: Volunteers, Trustees & Members

In order to be able to operate efficiently, effectively and economically, it is in Orinoco's legitimate interests to hold such personal information on its volunteers, trustees and members as will enable Orinoco to communicate with people on relevant matters eg:

- providing information about Orinoco's activities – particularly activities which, by their nature, are likely to be of particular interest to individual volunteers, trustees or members
- holding meetings
- seeking help, support and advice from volunteers, trustees or members, particularly where they have specific knowledge and experience
- ensuring that any particular needs are appropriately and sensitively accommodated when organising activities or meetings.

Legitimate Interest: Closed Circuit TV (CCTV) Recording

Orinoco collects video CCTV images of people entering and moving around its premises to protect its property and to provide a safe and secure environment for its staff, volunteers and visitors. The information collected is only processed and, where appropriate, shared with other authorities (eg the Police) where it is necessary to investigate a potential crime.

5) Individual Rights

5.1 The right to be informed

When collecting personal information Orinoco will provide to the data subject free of charge, a Privacy Policy written in clear and plain language which is concise, transparent, intelligible and easily accessible containing the following information:

- Identity and contact details of the Data Controller
- Purpose of the processing and the lawful basis for the processing
- The legitimate interests of the Data Controller or third party, where applicable
- Any recipient or categories of recipients of the personal data
- Details of any transfers to third country and safeguards
- Retention period or criteria used to determine the retention period
- The existence of each data subject's rights
- The right to withdraw consent at any time, where relevant
- The right to lodge a complaint with a supervisory authority

In the case of data obtained directly from the data subject, the information will be provided at the time the data is obtained.

In the case that the data is not obtained directly from the data subject, the information will be provided within a reasonable period of Orinoco having obtained the data (within one month), **or**,

if the data is used to communicate with the data subject, at the latest, when the first communication takes place; **or**

if disclosure to another recipient is envisaged, at the latest, before the data is disclosed.

5.2 The right of access

The data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him/her is being processed, and, where that is the case, access to his/her personal data and the information can be found in Orinoco's Privacy Policy.

5.3 The right to rectification

The data subject shall have the right to require the Data Controller without undue delay to rectify any inaccurate or incomplete personal data concerning him/her.

5.4 The right to erase (right to be forgotten)

Except where the data is held for purposes of legal obligation or public task (0 or 0) the data subject shall have the right to require the Data Controller without undue delay to erase any personal data concerning him/her.

5.5 The right to restrict processing

Where there is a dispute between the data subject and the Data Controller about the accuracy, validity or legality of data held by Orinoco the data subject shall have the right to require the Data Controller to cease processing the data for a reasonable period of time to allow the dispute to be resolved.

5.6 The right to data portability

Where data is held for purposes of consent or contract (0 or 0) the data subject shall have the right to require the Data Controller to provide him/her with a copy in a structured, commonly used and machine-readable format of the data which he/she has provided to the Data Controller, and have the right to transmit those data to another Data Controller without hindrance.

5.7 The right to object

- a) The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him/her which is based on Public Task or Legitimate Interest (0 or 0). The Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims
- b) Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing
- c) Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes
- d) At the latest at the time of the first communication with the data subject, the right referred to in paragraphs a) and c) shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

6) Complaints

6.1 In line with the ICO's guidance and the Data (Use and Access) Act 2025, we have a [dedicated process for handling complaints](#) relating to personal data. Anyone who believes we have not handled their personal information appropriately may raise a data protection complaint with us.

6.2 We will:

- Provide a clear and accessible way for individuals to submit data protection complaints.
- Acknowledge receipt of such complaints within 30 calendar days.
- Take appropriate steps to investigate the complaint without undue delay, including making necessary enquiries and keeping the complainant informed throughout.
- Communicate the outcome of the complaint promptly and clearly, explaining any actions taken or decisions made.

- 6.3** All complaints will be handled fairly, transparently, and in accordance with our obligations under the Data Protection Act. If the complainant remains dissatisfied, they may escalate the matter to the Information Commissioner's Office (ICO).

Agreed by the Trustees: 17/07/2026

Date of next review: July 2027