



Privacy Policy

1. About this privacy policy

WSA Community Consultants Limited (WSA) respects your privacy. This policy explains what personal information we collect, why we use it, who we may share it with, how long we keep it, and your rights.

It applies to our research, evaluation and community development work, project administration, relationships with clients, associates and suppliers, accounts and records, and our mailing list.

We process personal information in line with UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended.

2. Who we are and how to contact us

WSA Community Consultants Limited will usually be the data controller where we decide why and how personal information is used. In some projects, we act as a data processor on behalf of a client and process personal information in accordance with their instructions and the requirements of our contract.

For privacy enquiries, requests about your personal information or complaints, please contact:

- Director: Wendy Sugarman
- Email: wendy@wsacommunity.co.uk

3. What personal information we collect

3.1 Research, evaluation and community programmes

We may collect contact details, such as address, email address or telephone number, where these are needed to arrange participation or manage a project.

We may also collect demographic and other sensitive information for research and monitoring purposes. Some of this may be special category personal data, which has additional protection under data protection law.

Where monitoring information is collected, WSA removes identifying details and securely destroys the original information. The remaining information is anonymous and cannot be linked back to an individual.

3.2 Clients, project contacts and suppliers

We may hold names, organisation and role details, business contact details, correspondence, project information and relevant account or payment records where needed to manage our work and professional relationships.

3.3 Associates

We may hold CVs, personal contact details, records of assignments and work delivered, and information needed for contracts, payments, accounts and legal requirements.

3.4 Mailing list

We keep contact details for our mailing list only where you have agreed to receive our communications. You can unsubscribe or withdraw your consent at any time using the function on mailchimp or by emailing info@wsacommunity.co.uk.

4. Where we get personal information

We usually collect personal information directly from you. Sometimes, where WSA is the data controller, we receive personal information from a client or partner organisation. Where required, we will tell you what information we have received, where it came from and how we use it.

5. Why we use personal information

Where WSA is the data controller, we only use personal information where data protection law allows us to do so. Depending on the activity, we may rely on:

- **legitimate interests**, our interests in carrying out and managing research, evaluation and community development work, and in running our business;
- **contract**, where information is needed to manage commissioned work or our arrangements with associates;
- **legal obligations**, for example for tax, accounting or other records we are required to keep; or
- **consent**, for example for our mailing list.

For some commissioned projects, the lawful basis will depend on the nature of the project and WSA's role. Where WSA acts as a data processor, the client is responsible for determining the lawful basis and WSA processes personal information on the client's instructions.

6. Sensitive and special category information

Some projects involve sensitive monitoring or demographic information. Where identifiable information is classed as special category data, an appropriate lawful basis and an additional legal condition must apply before it is used.

We collect only what is needed for the project, anonymise monitoring information as described above, and restrict access to any sensitive information that remains identifiable.

7. Sharing personal information

WSA does not routinely share identifiable research or evaluation information with third parties. Sometimes a project requires us to share personal information with a project partner. Where WSA is the data controller, we will let you know about this and, where necessary, ask for your consent. Where WSA acts as a data processor, any sharing will be in accordance with the client's instructions and our contract. We may also disclose personal information where required by law.

8. How we protect personal information

We use appropriate security measures to protect personal information from unauthorised access, loss, misuse or disclosure. Access to personal information is limited to those who need it for their work.

9. How long we keep personal information

We keep personal information only for as long as it is needed, including for any legal or client contractual requirements. Where WSA acts as a data processor, retention and deletion may also be determined by the client's instructions and our contract. When information is no longer required, it is securely deleted or destroyed.

Information that has been genuinely anonymised is no longer personal data and may be retained for research, evaluation or statistical purposes.

10. Your data protection rights

You have a number of rights under data protection law. These include the right to:

- ask for a copy of the personal information we hold about you;
- ask us to correct information that is inaccurate or incomplete;
- ask us to delete your personal information in certain circumstances;
- ask us to restrict how we use your personal information in certain circumstances;
- receive or transfer your personal information in certain circumstances; and
- withdraw your consent at any time where we rely on consent.

You also have the right to object to certain ways in which we use your personal information.

Some of these rights have specific legal conditions or exceptions. If you make a request, we will let you know if these affect your request.

If WSA is processing your information only on behalf of a client, we may need to refer your request to that client as the data controller.

11. Complaints

If you have concerns about how we use your personal information, or wish to make a data protection complaint, please contact the Director using the details in section 2. We will acknowledge a data protection complaint within 30 days and investigate and respond without undue delay. Where WSA is processing information on behalf of a client, we may need to refer the complaint to that client as the data controller.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection: <https://ico.org.uk/make-a-complaint/>

12. Changes to this privacy policy

We will review this policy regularly and update it when our use of personal information or legal requirements change.