

# Privacy Policy

Policy generated by	Location	Date approved	Last review date	Next review date
PPC	Member > Policies guides and handbook > Policies	18/11/25		18/11/26

## Related policies

Related policy	How is this policy relevant?	Location
Privacy Notice	When we collect personal data, whether directly from the data subject or from a third party, then we are obliged to provide the data subject with certain information about that personal data including what we will do with it, who we will share it with and what our legal basis for processing is. That information is set out in our Privacy Notice.	Member > Policies guides and handbook > Policies
Workers.coop website Privacy Policy	This policy provides additional privacy information, specific to the website.	<a href="https://www.workers.coop/privacy-policy/">https://www.workers.coop/privacy-policy/</a>
Workers.coop forum privacy policy	This policy provides additional privacy information, specific to the forum	<a href="https://forum.workers.coop/privacy-policy/">https://forum.workers.coop/privacy-policy/</a>
Subject Access Request (SAR)	The SAR outlines the process workers.coop should go through should a data subject enact their data protection rights.	Member > Policies guides and handbook > Policies

### If you remember nothing else, remember this:

Anyone who does work for workers.coop, whether as a worker member, enterprise member, volunteer, contractor or employee, must read, understand and comply with this policy when processing personal data. We are all responsible for processing personal data securely and in compliance with GDPR.

# What is this policy?

This policy sets out how worker.coop handles the personal data of members, volunteers, contractors, employees and other third parties.

This policy is intended to ensure that we:

- Comply with data protection law and follow good practice.
- Protect the rights of anyone who becomes a member of workers.coop, volunteers or carries out paid work for workers.coop, or engages with workers.coop through any other means.
- Are transparent about how we store and process individuals' data.
- Are protected from the risks of a data breach.

Protecting the confidentiality and integrity of personal data is a critical responsibility that we take seriously at all times. This policy is therefore intended to apply to the personal data that we process about you. It also applies to you in situations where your role involves you processing data on our behalf.

This policy does not form part of any employee's contract of employment, and we may amend it at any time. It does not override any applicable national data privacy laws and regulations in countries where we operate.

# Who is this policy relevant to?

This policy applies to all personal data that we process regardless of the media on which that data is stored, or whether it relates to past or present employees, contractors, volunteers, worker members, enterprise members, supporters or any other data subject.

Anyone who does work for workers.coop, whether or not they are employees, must read, understand and comply with this document when processing personal data. Any breach of the rules contained within this policy may result in disciplinary action.

# Definitions

**The data controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. In this case, the data controller is workers.coop.

**The data processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller (workers.coop).

**Personal data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location

data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special category data:** GDPR defines special category data as personal data

- revealing racial or ethnic origin;
- revealing political opinions;
- revealing religious or philosophical beliefs;
- revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- concerning health;
- concerning a person's sex life; and
- concerning a person's sexual orientation

**The data subject:** The individual that personal data relates to.

**Data processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Pseudonymisation:** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person

**Registered user:** Someone who have registered for at least one workers.coop online service.

**Member:** Someone who works for a cooperative that is a member of workers.coop.

**Worker member:** Someone who does work for workers.coop on a voluntary or paid basis.

**Website:** any online service hosted on the workers.coop domain or its sub-domains, such as hello.workers.coop, and accessible from browsers over the Internet.

## Underlying principles

This policy has been produced to comply with the [General Data Protection Regulations \(GDPR\)](#). The UK GDPR sets out seven principles:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimization
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

In addition to these 6 core principles there are a number of other obligations on workers.coop (as the controller of personal data) and rights that data subjects have in relation to their data. These include requirements that personal data is:

- Not transferred to another country without appropriate safeguards in place;
- Made available to data subjects, who must be allowed to exercise certain rights in relation to their personal data.

## What does the policy mean for me?

Below we explain what each of the 7 GDPR principles means for you, as a data processor.

### **Fair, lawful and transparent processing**

You can only process personal data fairly and lawfully and for one of the specified purposes (or legal bases) set out in the GDPR. These include the following:

- a) The data subject has given consent to the processing of their personal data for one or more specific purposes. Consent must be freely given, specific, informed and unambiguous.

In order to consent to the processing of their personal data, a data subject should indicate their agreement either by a statement or by positive action. You cannot assume that consent has been given in the absence of any express agreement.

Data subjects must be easily able to withdraw their consent at any time. We will keep records of all consents, so that we can demonstrate our compliance with this data protection requirement.

- b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

When we collect personal data, whether directly from the data subject or from a third party, then we are obliged to provide the data subject with certain information about that personal data including what we will do with it, who we will share it with and what our legal basis for processing is. That information will be set out in a Privacy Notice.

## **Purpose Limitation**

When you collect personal data it must be only for explicit and legitimate purposes that are clear up front. You may not process the data in any manner that is incompatible with these purposes.

If the purposes for data collection and processing change, then you must inform the data subject of these new purposes, and if necessary, you must gain their renewed consent.

## **Data Minimisation**

The data that you collect and process must be limited to what is strictly necessary and relevant for the intended purposes. When any data is no longer needed for these purposes, you must then either delete or anonymise it.

## **Accuracy**

You must check the accuracy of any personal data at the point of collection, and at regular intervals afterwards, and either delete or correct inaccurate or out-of-date personal data.

## **Storage Limitation**

Personal data must not be kept in an identifiable form for any longer than is necessary for the stated purposes for which the data is processed. Therefore, you must ensure that when personal data is no longer needed, it is deleted or anonymised. We will require third parties to also delete or anonymise data where and when applicable.

## **Integrity and Confidentiality (the security principle)**

Workers.coop must secure personal data by taking technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage. Such safeguards may include the use of encryption and pseudonymisation. We will exercise particular care in protecting special categories of personal data and criminal convictions data. As a data processor, you must comply with any measures taken by workers.coop to secure personal data. These include:

1. Using only workers.coop approved software to collect, process and store personal data. Where existing software does not provide the required functionality, please contact [board@workers.coop](mailto:board@workers.coop) for guidance.
2. Ensuring that passwords used to secure personal data are: (a) strong (at least 12-16 characters with a mix of uppercase and lowercase letters, numbers, and symbols; and avoiding personal information or common words), (b) changed at least once every 12-months, (c) known only by individuals authorised to access the personal data, and (d) stored securely, ideally in a password manager.

3. Ensuring that personal data can only be accessed, altered, disclosed or deleted by those with authority to do so, noting that this may require you to limit access to folder and/or files.
4. Ensuring that personal data can be recovered should it be accidentally lost, altered or destroyed.
5. Ensure that data is encrypted or pseudonymised where a risk assessment deems this to be appropriate, for example, in the case of special category data.
6. Limiting access to, and appropriately destroying any physical copies of personal data.
7. Using only password protected or encrypted devices to store, process and transmit personal data.
8. Maintaining a well organised filing system that is understood by anyone authorised to access the data.

## **Accountability**

As the Data Controller workers.coop are responsible for implementing appropriate technical and organisational measures to ensure compliance with the data protection principles detailed above.

As part of that responsibility we will appoint a person(s) to be responsible for data protection and we may appoint a suitably qualified Data Protection Officer. We will also take a number of other steps, including to:

- Ensure and document GDPR compliance. This will be carried out by the appointed person(s) responsible for data protection.
- Provide training and/or guidance on the GDPR to anyone who is, or may in the future, act as a data processor. It is your responsibility to read, understand and implement any guidance provided (including but not limited to this policy); and to participate in training as and when required.

## **What data protection rights do data subjects have?**

People have the right to access their own personal data. This right does not allow other people to request an individual's data, even if they are related to the individual, unless they are a legal guardian, have lasting power of attorney or some other written authority to make the request i.e. they are a lawyer acting on their behalf.

Data subjects have the following rights:

- The right to access: They have the right to ask workers.coop for copies of their personal information. We may charge a small fee for this service.
- The right to rectification: They have the right to ask workers.coop to correct any information that they believe to be inaccurate. They also have the right to ask workers.coop to complete information that they believe is incomplete.
- The right to erasure: They have the right to ask workers.coop to erase their personal data, subject to certain conditions.
- The right to restrict processing: They have the right to request that workers.coop restrict the processing of their personal data, subject to certain conditions.

- The right to object to processing: They have the right to object to the processing of their personal data by workers.coop, subject to certain conditions.
- The right to data portability: They have the right to request that workers.coop transfers the data we have collected to another organisation or directly to the data subject, subject to certain conditions.

A Data request should not be:

### **Manifestly Unfounded**

if an individual has no clear intention of exercising the right of access or is malicious in intent to harass the organisation

**Excessive** if it repeats the substance of previous requests without a reasonable interval having passed, or if it overlaps with other requests

If a data subject makes a request, we have one month to respond and should respond as outlined in the Subject Access Request (SAR).

## Record keeping

Worker.coop are required by law to keep full and accurate records of all our data processing activities. These records include:

- Data subjects' consents to the processing of their personal data;
- The name and contact details of our Data Protection Officer, if applicable;
- Clear descriptions of the types of data that we hold, and of the types of data subjects whose data we hold;
- The purposes of our data processing;
- The categories of recipients to whom the personal data has or will be disclosed;
- Details of any third-party recipients of personal data;
- Where possible the envisaged time limits for erasure of the different categories of data;
- Where possible, a description of the security measures in place.

## Personal Data Breaches

Should you become aware of a breach of personal data, you must report this immediately to [board@workers.coop](mailto:board@workers.coop) who will usually notify the appropriate regulator (unless it is assessed

that the breach is unlikely to result in a risk to the rights and freedoms of individuals) and, in certain instances, the data subject.

The appointed person(s) responsible for data protection will keep a record of all personal data breaches.