



## **Customer Feedback Privacy Notice**

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1. This privacy notice relates to Hull Culture and Leisure Limited's (HCL) Customer Feedback Scheme which covers concerns, comments and compliments. The information that you provide is processed in accordance with the General Data Protection Regulation and the Data Protection Act 2018.

2. Data Controller

Hull Culture and Leisure Limited is the controller for the personal information we process unless otherwise stated. You can contact us by phone, email and post, more details are provided below:

Our postal address is:

Hull Culture and Leisure Limited  
Pacific Exchange  
40 High Street  
Hull  
HU1 1PS

Email address: [info@hcandl.co.uk](mailto:info@hcandl.co.uk)

3. Data Protection Officer

Contact details of the Data Protection Officer:

Library Services Director  
Hull Culture and Leisure Limited  
Pacific Exchange  
40 High Street  
Hull  
HU1 1PS  
Tel: 01482 300300

4. Why are we collecting your data

Hull Culture and Leisure Limited provide many services. In this instance your personal data is being collected in relation to our Customer Feedback Scheme which covers concerns, comments and compliments. We will use the information you provide to respond to your feedback and where necessary investigate your concerns.

## 5. Legal Basis

The legal basis we use to process your data is 'consent' because you have submitted Customer Feedback to us and provided your personal contact details and other information in order that we can investigate and respond to your request.

## 6. Personal Data We Collect and Process

In order to investigate and respond to your feedback we will collect and process the following data:

- Name
- Address
- Phone number
- Email address

Without the above information we may not be able to fully investigate or respond to your feedback.

## 7. How we will use your personal data

The personal data we collect from you will be used to:

- Investigate your customer feedback
- Pass compliments to staff and/or staff teams
- Take action to rectify concerns or complaints
- Respond to you with details of the investigation and the action taken

## 8. Who will have access to your personal data

Your personal data will only be processed to deal with your customer feedback. The people who access your data will only be able to do so if they have a business need to process it in order to investigate your feedback or provide you a response. The people who process your data will be:

- Employees and casual workers of Hull Culture and Leisure Limited
- Volunteers for Hull Culture and Leisure Limited
- Third party providers who have a contract or Service Level Agreement to provide services on behalf of Hull Culture and Leisure Limited. These organisations will only process your data if it is necessary for them to deliver the requested service and will do so within the requirements GDPR
- HCL Board members if they have a business reason to do so
- Partner organisations with which we share systems, for example some school libraries share our library management system. We have agreements in place with these organisations and they cannot do anything with your data unless we have instructed them to do so. They will maintain the security and privacy of your data.

## 9. Keeping your data safe

We will hold your data securely. Details of concerns, comments and compliments are retained for 6 years and in any case where negligence may be involved for 15 years. Local Government Ombudsman complaints are retained for 10 years after the case is closed.

## 10. Sharing your data

We will not routinely share your personal information with third parties. Where necessary we may share information with Hull Culture and Leisure's partner organisations, agents and contracted providers if it is necessary for us to do so to respond to your feedback, a notable example is Hull City Council.

We may also share your information with other parties where we deliver shared functions. We may also disclose information to regulatory bodies; primarily this would be the Local Government Ombudsman. We may also share your information with health, social care, police or other professionals where it is found to be necessary to protect you or another person's vital interests or there is another overriding legal requirement. Where it is reasonably suspected that you have or may make a legal claim against the Company details may be shared with our legal service, our insurers and any third party legal advisors we engage.

In some circumstances we are legally obliged to share information. In any scenario we will satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

## 11. Deleting your data

If you make a request for your personal data to be removed from our systems we will do so within one calendar month of receiving your request unless we have a lawful reason to continue processing your data as specified at point 9 above. If we delete your data we will do so securely.

## 12. Your rights in relation to your data

You have the right to:

- Be informed- we must use plain language and communicate with you clearly
- Access - we must have processes in place to respond to requests from you to see the data we hold
- Rectification - we must correct inaccurate data we hold without delay
- Right to erasure (sometimes referred to as 'the right to be forgotten') - if you ask us to stop processing your data and delete it we must do so unless we have a lawful basis to retain it
- Right to restrict processing - where the accuracy or lawful processing is challenged temporary limits on the processing are required
- Right to data portability - you can ask us to provide the personal data we hold securely and in a machine readable format so you can be move, copy or transfer it to be used across different services

- Right to object - you can object to your data being processed
- Rights related to automated decision making - if there is additional profiling based on the data we hold then you can object and ask to be excluded from this

Further information can be found in our [Privacy Statement](#).

### 13. Making a complaint

If you think Hull Culture and Leisure Limited has not processed your personal data in accordance with GDPR you can make a complaint to our Data Protection Officer:

Library Services Director  
Hull Culture and Leisure Ltd  
Pacific Exchange  
40 High Street  
Hull  
HU1 1PS  
Tel: 01482 300300

Alternatively the Information Commissioners website will guide you on how to make a complaint to the Information Commissioners Office as the supervising authority. The link to the information is: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

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