# **Privacy Policy**

Field Level Tech believes that you have the right to control the use of your personal information, and that your privacy must be respected.

We limit the collection and processing of your personal data and we will not use personal data that you provide to us in a manner inconsistent with the purposes for which you provided it to us. We do not, and will not sell, rent or lease personal data, nor send marketing on behalf of third parties.

This data use policy describes how we will process any personal information that we may collect about you as a user of the field level tech verified service. For the policy covering our mailing list please see <a href="https://fieldleveltech.org/privacy-policy.pdf">https://fieldleveltech.org/privacy-policy.pdf</a>

### 1. Who is Field Level Tech?

Field Level Tech is a not-for-profit company, limited by guarantee. Our registered company number is **16126242**. Our registered address is: **20 Wenlock Road, London, England, N1 7GU**. You can contact us by emailing support@fieldleveltech.org

Field Level Tech is the data controller for data processing in accordance with this policy and is <u>registered with the Information Commissioner</u> as a data controller (registration ZB878137). The person responsible for data protection is James Southern.

### 2. The personal information we collect and how we use it

Personal data, or personal information, means any information from which your individual identity could be identified. It does not include data where the identity has been removed (anonymous data). We explain below the personal data we collect and how we use it, and explain the circumstances in which we only collect anonymised data.

If you use our "Verified Human" tool on BlueSky to get a "Verified Human" label

Field Level Tech works with OneID to operate this "Verified Human" service. You can read OneID's privacy policy <u>here</u>.

To obtain a "verified human" label you will be required to provide Field Level Tech with your BlueSky public handle, and to allow OneID to provide us with your OneID subject identifier.

Field Level Tech does not receive any other information from OneID except your OneID subject identifier. We will retain your OneID identifier alongside your bluesky handle for as

long as you keep your label, and for an additional year if you choose to remove your label. You can remove your label at any time.

We will only share your OneID and BlueSky identifiers with your permission, or where we have a public or legal duty to do so, e.g. to assist with detecting or preventing a crime.

### If you contact us by phone, email or in writing:

If you exchange emails, telephone conversations or other electronic communications with Field Level Tech, our team may record details of those conversations, sometimes including their content, for purposes of maintaining our relationship with you. If you contact us by email we use a secure and encrypted email provider to store your email.

### Work-related activities:

In the course of our work, we collect information such as the names, contact details and work-related information about individuals and organisations we work with. We keep this information in order to maintain a relationship with you and to invite you to collaborate on and participate in relevant work-related activities.

## 3. The legal bases for our personal data processing

In summary, where we are processing personal information or data, we rely on the following legal bases:

- Your specific consent to a particular use of your data (such as where you have signed up to receive a service or newsletter from us);
- Where you have entered into a legal agreement with us that necessitates that
  particular use of your data (such as where you make a payment or donation to us or
  enter into a contract to provide a service to us);
- Where we are obliged to process your data in a particular way by law (for example, if we are required by law to share information with an authority or regulator).

### 4. Your data and third parties

There are some third party service providers which Field Level Tech uses to further our stated purposes. We are transparent about those third parties. They are:

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We shall never voluntarily share your information with a third party for their own use.

There are some circumstances where we may have to disclose your information if required by law. We will only comply with requests when we are satisfied that they are lawful.

### 5. Third party links

This website may include links to third party websites, or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about

you. We do not control these third party websites and are not responsible for their privacy policies or statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 6. Retention and deletion of your information

We will delete or permanently anonymise personal data when it is no longer needed for the purposes for which it was collected. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it. Including for the purposes of fulfilling any regulatory, legal, tax, accounting and reporting requirements.

When determining the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and the applicable legal, regulatory, tax, accounting or other requirements.

### 7. The security of your information

We take the security of your information very seriously. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. Your rights

As a data subject you have a number of rights in relation to your personal data. You can exercise any of these rights at any time. If you wish to do so, please contact us at the details set out below, and explain what right you wish to exercise and why. We may need to ask you for more information about who you are (for e.g. we may request ID documents to help us verify your identity) or other information about your request to make sure we understand it properly. For full information about your rights under the current General Data Protection Regulation, please see the Information Commissioner's Office website.

#### Right of access

You have a right to request access to the personal information that we hold about you, and to some related information, under data protection law. You may have heard of this right being described as a "subject access request". We follow the ICO's "Subject Access Code of Practice" when dealing with requests for access to personal data. You can read this code by visiting

https://ico.org.uk/media/for-organisations/documents/2014223/subject-access-code-of-practice.pdf

### Right of rectification and erasure

You can also require any inaccurate personal information to be corrected or deleted. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the "right to be forgotten").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

## Your right to stop receiving communications

As noted above, where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication.

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by writing to us at support@fieldleveltech.org and telling us which communications you would like us to stop sending you.

### Right to restrict processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

#### Right to object

You can object to our use of your personal information at any time and you may have the right to object to our processing of some or all of your personal information in some other circumstances.

## 9. Making a complaint

If you are unhappy with the way that we have processed or handled your data then you have a right to complain to the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom.

The contact details for the Information Commissioner's Office are:
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9
5AF / +44 0303 123 1113 / https://ico.org.uk/concerns/

### 10. Contact us

We want to do everything we can to make sure the information we hold on you is accurate and up to date. If you have a query regarding this statement, if you would like us to amend any information or request access to the information we hold on you, please contact James Southern, support@fieldleveltech.org or call +44 7514 794270.

### 11. Opting-out

Except for information that needs to be kept for legal reasons, you have a right to opt-out of us processing your data or withdraw your consent at any time. Please contact us using the above details if this is the case.

### 12. Changes to this policy or your personal information

We keep this data use policy under regular review and will place any updates on this page. This data use policy was last updated on 19/3/2025