

# **Legal Observer Bib Order Specialist Data Handling Protocol**

This protocol “the protocol” “the bib policy”, is to be read in conjunction with the Green and Black Cross Privacy Notice ‘the notice’, which can be found at [greenandblackcross.org/privacy-cookies/](https://greenandblackcross.org/privacy-cookies/). This protocol describes the way that Green and Black Cross “we” “us” “GBC” will handle data submitted through the LO bib order form, which can be found at [greenandblackcross.org/order-a-legal-observer-bib/](https://greenandblackcross.org/order-a-legal-observer-bib/). Where there is a direct contradiction between this protocol and the notice, this protocol supersedes that information given in the notice.

## **What data we collect**

We collect data limited to your Name<sup>1</sup>, Address, email address, and the requested size of the bib.

## **Why we collect your data**

We do so for the purpose of posting a Legal Observer bib to your address. This data is collected on the basis of consent, and when you give us this data, you consent to us processing it for this purpose in the way we describe in this protocol.

## **How we process your data**

The data you give us will be initially stored on the servers used by Cognito Forms ([cognitoforms.com](https://cognitoforms.com)) “Cognito” “the form provider”. According to Cognito forms, they do not access this data unless requested to do so through an official support request. If we submit such a request, we will notify you before doing so. Cognito offers encryption at rest for entry data that is specified to be so. The encryption used is 256 bit AES. Cognito ensures that its site is accessed through HTTPS 100% of the time, and uses TLS 1.2/SSL encryption. GBC will always, to the best of its ability, use the highest level of encryption available from Cognito. It is likely that the Microsoft Azure data centres which Cognito uses to store data are located outside the UK. GBC undertakes to continue storing data via Cognito on these servers because of the high level of encryption and security provided by Cognito.

Information in this protocol about third parties including Cognito and the way they collect, store, and handle data is correct to the best of the author’s

1. “Name” here refers to a bipartite string of characters that someone is reasonably known by at their address, or consents to having printed on a letter to their address and need not match legal documents for the purposes of this agreement between the recipient and GBC. Royal Mail requires proof of ID to collect mail from a delivery office if delivery is unsuccessful. GBC accepts no liability for the loss of items due to an inability to produce ID documents matching the name on the parcel.

knowledge at the time of writing (July 2021). It is subject to change and the latest information should always be sought from the third party itself. Information about the way Cognito handles data is available at <https://www.cognitoforms.com/privacy>. Information from Cognito about data security is available at <https://www.cognitoforms.com/support/74/entries/data-security>.

These data will be then briefly stored as a local file on an encrypted hard disk by a member of the GBC Resources collective for the purposes of exporting the data to Royal Mail Click and Drop. These data will be uploaded to Click and Drop for the purpose of generating postage labels. Information about how Royal Mail handles data can be found here <https://www.royalmail.com/gdpr>.

### **How we dispose of your data**

Once you have confirmed receipt of your bib, all data relating to your order will be destroyed. Firstly, your entry data on Cognito will be deleted no later than 14 days after confirmation of receipt. The local file will be destroyed after the items have been despatched. The Royal Mail 'order' data will be deleted upon confirmation of receipt.

### **Exercising rights to your data**

You may exercise many of your data rights at any time after submitting your data, although some only apply to GBC as statutory obligations after the discharge of the purpose for which it was collected. You can read more about your rights and when they apply here: <https://ico.org.uk/your-data-matters/>

Should you wish to exercise these rights, you may do so in accordance with the procedure detailed in the GBC Privacy Notice.