

Haki Collective CIC Privacy Notice

Updated: 01.08.26



Introduction

Haki Collective CIC is committed to protecting the privacy and data security of all individuals and organisations with whom we work. This Notice outlines how Haki Collective CIC processes personal data in compliance with the UK General Data Protection Regulation (GDPR). As an organisation that provides training on disability justice, the social model of disability, and racial justice, we understand the importance of privacy, particularly in the context of sensitive personal data.

1. Purpose

The purpose of this notice is to ensure that Haki Collective CIC complies with GDPR in processing personal data fairly, lawfully, and transparently. It explains what data we collect, how we use it, and the rights of data subjects under GDPR.

2. Scope

This notice applies to all directors, employees, contractors, and volunteers who handle personal data on behalf of Haki Collective CIC. It also applies to any personal data collected from individuals and organisations participating in Haki Collective CIC's training and consultancy services.

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3. Key definitions

- Personal data: any information that can identify an individual directly or indirectly (e.g., Names, email addresses, IP addresses).
- Sensitive personal data: special categories of personal data such as race, disability status, health information, and ethnic origin, which require additional protection under GDPR.
- Processing: any operation performed on personal data, such as collection, storage, use, or sharing.
- Data subject: the individual whose personal data is being processed.
- Data controller: Haki Collective CIC, which determines how personal data is processed and for what purposes.
- Data processor: any **third party that processes data on behalf of Haki Collective CIC.**

4. Principles of data protection

Haki Collective CIC adheres to the GDPR principles for processing personal data:

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- Lawfulness, fairness, and transparency: personal data will be processed lawfully, fairly, and transparently.
 - Purpose limitation: data will be collected for specific, legitimate purposes and not processed in a manner that is incompatible with those purposes.
 - Data minimisation: only the personal data necessary for the specified purposes will be collected.
 - Accuracy: personal data will be accurate and, where necessary, kept up to date.
 - Storage limitation: personal data will not be kept for longer than is necessary for the purposes for which it is processed.
 - Integrity and confidentiality: personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and accidental loss or damage.

5. What personal data we collect

Haki Collective CIC may collect the following types of personal data:

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- General information: names, job titles, contact details (e.g., Email addresses and phone numbers) of individuals working within organisations we train.
 - Sensitive personal data: information related to race, disability, and other characteristics relevant to training needs.
 - Website data: IP addresses, browser types, and cookies when individuals visit our website.

6. How we use personal data

We use personal data for the following purposes:

- Training and consultancy: to provide tailored disability and racial justice training to partner organisations.
- Communication: to correspond with individuals about training events, resources, and consultancy services.
- Administration: for record-keeping and to fulfil legal obligations (e.g., Contracts and invoicing).
- Website analytics: to improve user experience on our website through the use of cookies and analytics tools.

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7. Legal bases for processing

Haki Collective CIC relies on the following legal bases for processing personal data under GDPR:

- Consent: where explicit consent is given by the data subject (e.g., Subscribing to newsletters or sharing sensitive data).
- Contractual obligation: where processing is necessary for the performance of a contract (e.g., Delivering training services).
- Legal obligation: to comply with legal requirements (e.g., Financial record-keeping).
- Legitimate interest: for the purposes of our legitimate interests, provided they do not override the data subject's rights (e.g., Improving services).

8. Data sharing

Haki Collective CIC may share personal data with the following parties:

- Third-party service providers: such as IT support, cloud storage services, or trainers engaged on a freelance basis. All third-party processors are required to comply with gdpr and ensure data security.

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- Legal authorities: when required by law, we may share data with regulators or law enforcement agencies. Haki Collective CIC does not sell or rent personal data to third parties.

9. Data security

We implement appropriate technical and organisational measures to protect personal data from unauthorised access, alteration, or destruction. These measures include:

- Encryption of sensitive data.
- Restricted access to personal data only for authorised personnel.
- Secure storage of physical documents and digital data.

10. Data retention

Personal data will only be retained for as long as necessary to fulfil the purposes for which it was collected, or to meet legal or regulatory requirements. After this period, data will be securely deleted or anonymised.

11. Data subject rights

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Under GDPR, individuals have the following rights regarding their personal data:

- Right to access: the right to request a copy of the personal data we hold.
- Right to rectification: the right to have inaccurate or incomplete data corrected.
- Right to erasure: the right to request deletion of personal data, subject to certain legal exceptions.
- Right to restrict processing: the right to request the restriction of data processing in certain circumstances.
- Right to data portability: the right to receive personal data in a structured, commonly used format.
- Right to object: the right to object to data processing based on legitimate interests or direct marketing.
- Right to withdraw consent: the right to withdraw consent at any time where data processing is based on consent.

12. How to exercise data rights

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Data subjects can exercise their rights by contacting Haki Collective CIC at: info@hakicollective.org

Address: Impact Brixton, Electric Lane, SW9 8LA, Brixton, London, UK.

We will respond to all requests within one month of receipt and may request additional information to verify the identity of the requestor.

13. Data breaches

In the event of a data breach, Haki Collective CIC will:

- Take immediate steps to contain and mitigate the breach.
- Notify the Information Commissioner's Office (ICO) within 72 hours if the breach poses a risk to individuals.
- Inform affected individuals if the breach is likely to result in a high risk to their rights and freedoms.

14. Cookies and Website Data

Haki Collective CIC uses cookies on its website to improve functionality and gather analytics. Users are notified of cookie use upon visiting the website and can manage their preferences via the cookie settings.

15. Changes to This Notice

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Haki Collective CIC reserves the right to update this notice to reflect changes in GDPR or data processing practices. Any updates will be posted on our website and, where appropriate, notified directly to individuals.

16. Contact Information

For any queries about this privacy notice or data protection practices, please contact us at:

- Email: info@hakicollective.org
- Address: Impact Brixton, Electric Lane, SW9 8LA, Brixton, London, UK.

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