

General Data Protection Regulation Policy

March 2021

Portland Works Little Sheffield Ltd

0114 275 9354 | info@portlandworks.co.uk
www.portlandworks.co.uk

Portland Works, Randall Street, Sheffield S2 4SJ
Registered in England & Wales. Company No: IP031143



Organisation

This data protection policy (“the policy”) is for Portland Works Little Sheffield Ltd of Randall Street, Sheffield, United Kingdom, S2 4SJ.

Portland Works is a society that operates a collection of workspaces for traditional and modern craftspeople located within one of the UK’s most important historical industrial buildings. Often referred to as the birthplace of stainless steel manufacturing, Portland Works was built in Sheffield in 1879 and is now one of the last remaining working examples of a purpose-built metal trades factory. Following a half-century of neglect, the building was purchased in 2013 by a social enterprise comprising more than 500 community shareholders who, having saved it from residential conversion, are now undertaking an extensive renovation.

The grade 2* listed building has been reborn as a centre for small manufacturing, independent artists and craftspeople, with more than 30 small businesses located within the 2600 square metre floor space. These include knife makers and sharpeners; metal engineering firms; cabinetmakers and joiners; jewellers and silver platers; artists; rug and guitar makers; photographers and even a Yorkshire based gin distillery.

Portland Works is supported by a team of tireless volunteers and by donations from individuals, businesses and institutions such as the Heritage Lottery Fund, the European Regional Development Fund and the J Paul Getty Jr. Charitable Trust.

Scope of the Policy

The policy applies to digital communication from the staff of Portland Works to its tenants, shareholders and supporters. In particular it applies to the distribution of regular email updates via a Portland Works electronic newsletter and sent via online email marketing platforms such as Mailchimp.

Date of Effectiveness

The policy is operational from 25 May 2018 and is to be renewed every three years. It has been prepared and approved by the Portland Works board of directors on 24 May 2018.

Data Protection Principles

Portland Works is committed to processing data in accordance with its responsibilities under the UK GDPR.

The UK GDPR is the UK General Data Protection Regulation. It is a UK law which came into effect on 01 January 2021. It sets out the key principles, rights and obligations for most processing of personal data in the UK, except for law enforcement and intelligence agencies.

It is based on the EU GDPR ([General Data Protection Regulation \(EU\) 2016/679](#)) which applied in the UK before that date, with some changes to make it work more effectively in a UK context.

Purposes of Data Processing

Portland Works maintains a mailing list of names and email addresses to allow consenting subscribers to be regularly updated on the renovation and the development of the building and business.

These updates take the form of an electronic newsletter that is sent via an online email distribution platform between five and ten times per year. Additional *ad-hoc* updates are also sent out for special occasions such as annual general meetings and shareholder notices.

As of 25 May 2018, Portland Works uses Mailchimp as its email distribution platform. Mailchimp's complete data collection and privacy policy is available at: <https://mailchimp.com/legal/privacy/>

Categories of Data

There are three categories of recipient for Portland Works electronic updates:

1. Shareholders – members of the public that purchased shares in Portland Works to support its renovation
2. Tenants – owners and employees of businesses that rent facilities within Portland Works
3. Supporters – members of the public and partner organisations that have asked to be kept updated on the progress of the Portland Works project

The common personal data that is held for these three groups includes first name, family name and email address. This is used for the distribution of the electronic newsletter. In addition, for tenants and shareholders we may also hold additional information that is essential to our ability to perform legally required transactions with them. This includes but is not limited to:

- Telephone number
- Street address
- Tenant rent and payment history
- Purchase dates and quantity of shares held
- Next of kin details for shareholders that have signed codicils

Shareholder Data

Portland Works is obligated to keep its shareholders informed of the date of legally-required upcoming meeting dates (e.g. AGM), of changes to the board or constitution, and of any significant decisions on which shareholders may need to comment.

This duty to keep shareholders informed constitutes a legitimate interest under GDPR. Shareholders were informed of this decision in an electronic newsletter sent out on 19 April 2018 and were provided with an email address to get in touch if they wished to discuss any part of it. Additionally, every communication that they receive contains contact information for Portland Works that they can use at any time.

Shareholders' data is held in a password-protected online distribution platform accessible only to the Portland Works building manager and board of directors. It is also held in a password-protected electronic spreadsheet stored on the building manager's company laptop computer and

in a cloud storage space that is accessible only by the building manager, education and outreach manager, shareholder communication team and board of directors.

Tenant Data

Portland Works provides operational workspace on a rental basis for its tenant's businesses. Because of this there is a requirement to regularly conduct business transactions with tenants that necessitates the holding of basic financial records on rent and past payments. In addition, Portland Works is also a historic building that is undergoing extensive renovation. It therefore has a duty of care to manage the health and safety of tenants by keeping them regularly updated of what renovation works are being conducted and where.

The combination of these two essential requirements constitutes a legitimate interest under GDPR. Tenants were informed of this decision in an electronic newsletter sent out on 19 April 2018 and were provided with an email address to get in touch if they wished to discuss any part of it. Additionally, every communication that they receive contains contact information for Portland Works that they can use at any time.

Tenant's data is held in a password-protected online distribution platform accessible only to the Portland Works building manager and board of directors. It is also held in a password-protected electronic spreadsheet stored on the building manager's company laptop computer and in a cloud storage space that is accessible only by the building manager, education and outreach manager, shareholder communication team and board of directors.

Supporter Data

The third category of data is the names and email addresses of people that asked to be kept updated on the Portland Works project due to their interest in local business or industrial heritage.

Prior to the GDPR deadline, this group numbered around 350 people but because the exact details of each person's consent were not perfectly recorded, the Portland Works board took the decision to seek re-consent from every individual on the list. On 8 May 2018, each member was contacted electronically using the online email distribution platform with the following message:

Stay in Touch with Portland Works

You may have heard about the new General Data Protection Regulation (GDPR) that comes into effect on 25 May. To comply with this, we need you to confirm that you're still happy to receive update emails from us.

We use your email address to send you a newsletter every one or two months that shares the latest updates from Portland Works. We will never share your email address and you can unsubscribe at any time simply by clicking the link in the footer of every newsletter that we send to you.

CLICK TO CONFIRM SUBSCRIPTION

The button above will open a small web page that ask you to:

1. Enter your email address and name
2. Tick a box that gives us your consent to contact you
3. Click a button to subscribe to our new mailing list

It should take less than 30 seconds to complete. If you prefer, you may also email us directly to subscribe at manager@portlandworks.co.uk.

The button in the message linked to an online signup form that featured additional explanation and the inclusion of a GDPR compliant tick box (see below).

Would You Like to Stay in Touch?

You may have heard about the new General Data Protection Regulation (GDPR) that comes into effect on 25 May. To comply with this, we need you to confirm that you're still happy to receive update emails from us.

To continue receiving the **Portland Works** newsletter please complete the form and tick the box below:

* indicates required

Email Address

First Name

Last Name

Confirm Your Consent

Please TICK THE BOX below and hit the SUBSCRIBE button at the bottom to confirm your subscription to our newsletter.

YES, I would like to continue receiving Portland Works updates via email

You can change your mind at any time by clicking the unsubscribe link in the footer of any email you receive from us, or by contacting us at manager@portlandworks.co.uk. We will treat your information with respect. For more information about our privacy practices please visit our website. By clicking below, you agree that we may process your information in accordance with these terms.



We use MailChimp as our marketing automation platform. By clicking below to submit this form, you acknowledge that the information you provide will be transferred to MailChimp for processing in accordance with their [Privacy Policy](#) and [Terms](#).

Subscribe to list

Supporters' data – including the exact time that their consent was received – is held in a password-protected online distribution platform accessible only to the Portland Works building manager and board of directors. It is also held in a password-protected electronic spreadsheet stored on the building manager's company laptop computer and in a cloud storage space that is accessible only by the building manager, education and outreach manager, shareholder communication team and board of directors.

Retention Policy

The data held by Portland Works that pertains to transactions with tenants or shareholders is retained in accordance with accounting and legal record keeping requirements.

The information held that pertains to supporters is held until that individual requests it be removed, either via direct email to the Portland Works building manager or via the one-click unsubscribe option that is included in the footer of every electronic newsletter.

Every person on which data is held has the right to have access to their data, to have it corrected or to have it erased at any time (providing it does not conflict with any other legal obligation to maintain contact).

Sharing of Data

The personal data held by Portland Works is accessible only by the building manager, education and outreach manager, shareholder communication team and board of directors. No data will be shared with any third parties unless required by law.

Further Information

Portland Works is not required to appoint a data protection officer due to its size and so any questions either on this policy or on the data held should be directed in the first instance to the building manager.

This can be done by emailing manager@portlandworks.co.uk, by telephoning 0114 275 9354 or by writing to the following address:

Building Manager
Portland Works
Randall Street, Sheffield S2 4SJ
United Kingdom

The building manager, education and outreach manager, shareholder communication team or a member of the Portland Works board will reply via the authors' preferred method within 48 hours.