

PRIVACY POLICY

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1. Introduction

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about participants, partner providers, funders, suppliers, sponsors and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is Active Impact CIO, Unit 16, Highnam Business Centre, Newent Road, Highnam GL2 8DN.

2. Data protection principles

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

Information you give to us

We may collect, use, store and transfer different kinds of personal information about you, including:

- Identity Data, such as your name, marital status, title, date of birth, gender, job title and your employer,
- Contact Data, such as your home and work addresses, personal and work email addresses and personal and work telephone numbers,
- Document Data, such as copies of your passport, driving licence, utility bills, etc,
- Third Party Data, namely Identity Data, Contact Data, Document Data and Financial Data, such as bank account, and salary details,
- Transaction Data, including details about payments to and from you, and other details of services you purchase from us,
- Technical Data, including IP addresses, your log-in data, browser type and version, time-zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website,

- Profile Data, such as your username, password, purchases or orders made by you, your interests, preferences, feedback and survey responses,
- Usage Data, including information about how you use our website, social media, products and services, and
- Marketing Data, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

3. 'Special category' data

- Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.
- During the course of providing you with employment, support services including: training, volunteering and support to run short breaks we may collect 'special category' data about you.

4. How we collect your personal information

We may obtain personal information by directly interacting with you, such as:

- meeting with you in your or our offices, at events or elsewhere,
- advising or supporting you or your organisation to provide inclusive services
- providing you or your organisation with training services
- filling in forms on our website,
- participating in discussion boards or other social media functions on our website,
- when you make a grant or donation to our work
- giving us your business card,
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback,
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you, or
- corresponding with us by phone, email, letters or otherwise.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- your family members, your business colleagues and other contacts including, social workers, local authority staff, schools and partner providers,
- professional advisers and networks with which both you and we are connected,
- analytics providers (such as Google),
- advertising networks,
- providers of technical, payment and delivery services, and

- by conducting searches of publicly-available databases or social media sites, such as Companies House, Facebook, Twitter, LinkedIn, the VCS Alliance, Gloucestershire County Council and the Charity Commission

5. How we use your personal information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- process funding and sponsorship
- we need to perform a contract we are about to enter into, or have entered into, with you or where we are managing a contract you have entered on behalf of a third party.
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- provided we have your explicit consent to use it,
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent,
- where it is necessary for reasons of substantial public interest,
- where you have previously made that data public knowledge,
- where there is a legitimate concern for the safety of others or
- where there is some other legal basis that allows us to use that information.

6. Purposes for which we will use your personal information

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us

Legal basis

To register you as a new volunteer or partner and verify your identity

It will be necessary for the performance of the contract between us and Gloucestershire County Council.

To obtain the views of participants who have attended events/ training that we provided or marketed.

It will be necessary for our legitimate business interests to ensure we are fully aware of all issues relating to the matter that is the subject of the specific services we have agreed to provide

To apply for and process any grants, donations and/ or sponsorship

It will be necessary for our legitimate business interests, namely to ensure that you receive information about our organisation how we propose to use grants, donations and/ or

	sponsorship and to agree any appropriate reporting conditions.
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for contracted services we have provided
To notify you about changes to our terms of business or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are-aware of our current terms and conditions
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website.
To enable you to participate in a prize draw, competition or complete a survey	It will be necessary for our legitimate business interests, namely to study how clients, prospective clients, referrers and other third parties use our services, to develop them and help grow our business
To provide you with information about other services we provide that are similar to those that you have already received from us	Where you have previously received marketing communications from us, then it will be necessary for our legitimate business interests, namely to ensure you continue to receive communications that you have previously agreed to receive Where you specifically ask us to provide you with certain marketing communications s, then it will be necessary for our legitimate business interests, namely to ensure we provide you with the communications that you have requested In all other cases, we will only do this if you give us your consent
To invite you to events such as seminars, courses, workshops, family and consultation events, and network meetings	It will be necessary for our legitimate business interests to ensure you are aware of the latest information in relation to the services we offer, particularly in relation to the services we have provided to you, or are providing to you, or otherwise to develop our relationship with you–

Where you would not normally have a reasonable expectation of receiving such invites from us, we will only send you invites if you agree

To register you on a course

It will be necessary for our legitimate business interests to ensure you receive the best experience when you enrol on a course.

We will only use your personal information for the purpose(s) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. What if you cannot or will not provide us with your personal information

It is a statutory requirement for you to provide us with certain information, namely sufficient information to verify your identity. For example, if you do not provide us with that information, you will be unable to volunteer with us on Of Course We Can events or become a Trustee.

8. Cookies

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Except for essential cookies, all cookies will expire after a maximum of two years.

9. Disclosure of your information

We may share your personal information with the parties set out below:

- any other parties in relation to promoting your work where it directly impacts on our contracts and services,
- partner providers, consultants, professional advisers, stet business networks with which we are connected,
- our outsourced IT services provider (details available on request), IT and other online cloud and data-room providers,
- our professional advisers (including solicitors, bankers, auditors and insurers),

- HM Revenue & Customs, the Information Commissioner's Office, and any other regulators and other authorities who require reporting of processing activities in certain circumstances,
- business and other partners, customers, suppliers and sub-contractors to the extent we consider it reasonably necessary for us to perform our contracted and training services,
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this policy.
- We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes.

10. Where we store your personal information

All information you provide to us is stored on secure cloud-based services in a country within the European Economic Area or where they abide by European Economic Area standards. For example, Mailchimp servers in the US comply with GDPR requirements. (more information: <https://mailchimp.com/help/about-the-general-data-protection-regulation/>)

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- Entry controls. Our offices are located on a shared business centre site the entrance gate to which is locked outside office hours (20.00 hrs – 7.00 hrs and weekends). Our office has a single access door which is locked when the office is unstaffed.
- Secure lockable cupboards and filing cabinets. Cupboards holding confidential information are kept locked when not in use.
- Methods of disposal. Paper documents are shredded before they are disposed of.
- Equipment. Our internal policies require that users lock or log-off from their computer when it is unattended.
- Training. We ensure our employees are trained in the importance of data security.
- Electronic access. All sensitive data stored electronically is password-protected. Where we have provided an authorised user with a password, that user is responsible for keeping this password confidential and is not permitted to share the password with anyone.
- Overseas transfers. Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards.
- Some of the data that we collect from you may be transferred to third parties (for example to Dropbox, Mailchimp and other cloud providers), who will store

the data at a destination outside the United Kingdom. If you are concerned about the levels of data security in those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

11. How long we will store your personal information

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

<u>Legal basis</u>	<u>Length of time</u>
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data for as long as it is necessary for our legitimate business interests, or such earlier time as you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data is more important than your interests, rights and freedoms, then we will be allowed to continue to use/store your data for as long as it is necessary for our legitimate business interests
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Further details relating to periods of retention, methods of destruction and receiving a copy of your file from us prior to destruction are set out in our standard terms of business.

12. Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a ***right to access the information*** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the ***right to ask us to rectify any information*** we hold about you that is inaccurate or incomplete.
- You have the ***right to ask us to erase the information*** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the ***right to ask us to stop using your information*** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the ***right to ask us to transmit the information*** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the ***right to object to us using/storing your information***. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which is more important than your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the ***right to withdraw your consent*** at any time.
- You have the ***right to object to us using/storing your information for direct marketing purposes***.

If you wish to exercise any of your legal rights, please contact our Data Compliance Officer, Nicole Hastie, by writing to the address at the top of this policy, or by emailing us at nicole@activeimpact.org.uk.

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

13. Opting out of receiving marketing communications

You can ask us to stop sending you marketing communications at any time either by contacting our Data Compliance Officer, Nicole Hastie, by writing to the address at the top of this policy, or by emailing us at nicole@activeimpact.org.uk or where appropriate using the 'Unsubscribe' facility on our general electronic communications e.g. newsletters

14. Automated decision-making

We do not use automated decision-making processes.

15. Third party links

Our website may include links to third-party websites, plug-ins and 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

16. Identifying you as a customer or partner of *Active Impact*

If you are a customer or partner, we may identify you as customer or a partner in our marketing material or in legal directories, although we will never publicly disclose any confidential information about your business without having obtained your prior consent. If you do not agree to us identifying you as a customer or partner, please notify our Data Compliance Officer, Nicole Hastie, by writing to the address at the top of this policy, or by emailing us at nicole@activeimpact.org.uk

If you are an individual beneficiary of our services we will also ask for your consent before identifying you as a beneficiary of our organisation.

17. Changes to our policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

18. Contact

Questions, comments and requests regarding this policy are welcomed and should be addressed to our Data Compliance Officer, Nicole Hastie, by writing to the address at the top of this policy, or by emailing us at nicole@activeimpact.org.uk