

## Privacy Statement

Swindon and North Deaf Children's Society is registered with the Charity Commission under registration number Charity No. 1026682.

We take your privacy very seriously and are committed to protecting your personal information.

This privacy policy explains how we may collect and use the information you give us.

If you have any questions regarding our Privacy Policy, please write to:

Chairperson, Swindon & North Wilts DCS, Hergest Ridge, Cues Lane, Bishopstone, Swindon SN6 8PP

Or email: [Swindon@ndcsgroup.org.uk](mailto:Swindon@ndcsgroup.org.uk)

This policy includes:

- How we collect information
- Where we collect information from
- What personal information we collect
- The purposes for which we will use your personal information
- Children's data
- Our use of cookies
- How we keep your data safe and who has access to it
- How we keep your information up to date
- Your right to your information
- Changes to this policy

### **How we collect information**

We may collect information about you whenever you interact with us, for example when you:

- Enquire about our activities or services, visit our website or donate to us
- Sign up to receive updates on a campaign or our activities
- Register as a member or update a membership record through the website
- Post content to our website/social media sites (including Facebook)
- Volunteer for us
- Attend a meeting with us and provide us with information about you
- Take part in one of our events
- Fundraise on our behalf
- Contact us through any channel, including online, email, phone, SMS, social media or post
- We may also receive information about you from third parties – but only if you've given them permission to share your information.

### **Where we collect information from**

We may collect information in the following ways:

1. When you give us information directly: You may provide your details to us when you request specific information, make a donation, campaign for us or participate in one of our events. We may work with a professional fundraising agency, which will collect this information on our behalf, but be assured we are still responsible for your data.
2. When you give us information indirectly: Your information may be shared with us when you use other fundraising sites and provide your consent to be contacted by the Swindon and North Wilts Deaf Children's Society, for example if you are fundraising for us via JustGiving or Virgin Money Giving. These organisations will have their own privacy policy and/or privacy statements, so please ensure you understand how they use your data.
3. Social media: Depending on your settings or the privacy policies for social media and messaging services like Facebook and Twitter, you might give us permission to access information from those accounts or services.
4. We collect information when you are using our website: upon visiting our website information about your visit is recorded and stored. See the section below on the use of cookies for more details.
5. When your information is available from other public sources: We may collect personal details about you from the public domain, such as from social networks, company websites, political and property registers, and news archives. We may use data services agencies to collect this information. Please see the section below for more details.

### **What categories of personal information we collect**

The type and quantity of information we collect and how we use it depends on why you are providing it.

If you support us or are a member, for example by making a donation, volunteering, registering to fundraise, signing up for an event or campaigning for us, we may collect where relevant:

- Your name, date of birth, email address, postal address, telephone number.
- Your children's names, dates of birth and information relative to their hearing loss.
- We may also collect other information, for example health or dietary information from people attending our events, information on next of kin so we know who to get in contact with them if there is a problem at an event you attend, or information on your experience of deafness or the experiences of a child or relative. We will not process sensitive personal information (special category data, in our case information about deafness and other health information) about you without your explicit consent.
- We also gather general information about the use of our websites, such as which pages people visit most often and which services, events or facilities are of most interest. We may also track which pages people visit when they click on links in emails from us. We may use this information to personalise the way our websites are presented when people visit them, to make improvements to our websites and to ensure we provide you with the very best service we can. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our websites.
- If you contact us, for example by telephone, letter, fax, email or via social media (e.g. Facebook, Twitter, or via Skype) or respond to a contact we make to you, we may keep a record of that correspondence so that we are able to refer to it in future, and keep a record of the kind of issues people raise.
- When we send communications to you, we will record details of these along with any actions you take as a result, such as support given (e.g. donations), other actions taken (e.g. helping with our campaigning), or requests you make to change the way that we communicate with you in the future.
- We will log information onto our database systems to retain a history of what you have requested and to ensure that we comply with any requests or complaints that you have made.

### **How we will use your personal information**

We will use your personal information in a number of ways, including for the following purposes:

1. To provide you with the services, products or information you have requested.
2. To create a membership record for you when you register with us online.
3. For administration purposes.
4. For marketing purposes to further our charitable aims, for instance fundraising and campaigning activities.
5. To ensure we are providing the best possible service, e.g. monitoring feedback we receive, or monitoring complaints.
6. To respond to any correspondence you have entered into with us including by letter, email, fax, social media or other means and contact you in relation to any interaction you have with us, including donations, activities in relation to your child, funding application forms or any online content you have signed up for.
7. To update you about any changes to our services.
8. To administer your donation, including Gift Aid processing.
9. To maintain our organisational records and ensure we have your most up-to-date marketing preferences.
10. To help us improve our services, campaigns, fundraising or information-offering.
11. To analyse and improve the operation of our website.
12. To analyse your website behaviour.
13. As part of this, we may analyse the personal information we hold to create a profile of your interests, preferences and likely giving behaviour so that we can contact you in the most appropriate way and with the most relevant information, including for fundraising and campaigning purposes. We might also use additional information to create this profile, for instance information about the financial and demographic characteristics of your postcode. If you would prefer us not to create this kind of profile please let us know. We will record and act on this request. Where relevant, we may also assess your personal information for the purposes of fraud and credit risk reduction.
14. If you enter your contact details in one of our online registration forms, we may use this information to contact you even if you don't "send" or "submit" the form. We will only do this to see if we can help with any problems you might be experiencing with the form or with our websites.
15. We will never allow any other organisation access to the data we hold about you for their own marketing purposes. In order to manage our relationship with you effectively, we may need to share your information with our service providers, associated organisations and agents who support us in our work. Where we do so, we will take care to ensure that they keep your data secure (see Who we Share Data With below).
16. Your privacy is important to us and so far as possible we will not send you any type or method of communications you tell us that you do not want to receive.
17. When we first record your personal details, we will ask you how you want us to keep in touch.
18. You can contact us at any time to change your preferences.
19. When we get in touch for marketing purposes, we will ask you whether you are happy for us to continue to contact you in this way.

20. All marketing contacts (e.g. fundraising or campaigning) we make will give you an opportunity to opt out of that particular type of communication.

21. If you are registered on the Telephone Preference Service, we will only make marketing phone calls to you if you have explicitly consented to calls from us.

22. We may contact you via post, unless you have told us you do not want us to write to you.

23. We may contact you via email or SMS where you have expressed a preference for a particular type of communication or where you have opted-in to these channels.

24. We might use your details to help us make best use of online media. For instance, if you have shared your email address with us, we might use that to ensure we are sharing relevant news with you on Facebook. If you don't want us to do this, let us know, or use the online media platform's tools to opt out of this.

We always want you to get the most out of our website, so if you do experience any issues with our online forms please contact us so we can follow up with you to find out how we can best support you with any problems experienced.

### **Children's data**

We collect and store information about deaf children and young people who we help directly or indirectly through our services or who contact us directly – whether it is provided by their parents or guardians or (in the case of young people 16-25) provided by themselves.

### **Our use of cookies**

'Cookies' are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. Essentially, a cookie takes the form of a small text file deposited on your computer's hard drive.

To find out how to delete existing cookies or prevent future cookies being stored on your hard drive, please visit [www.aboutcookies.org](http://www.aboutcookies.org) where you can follow clear instructions on how to delete and control cookies using various internet browsers.

### **SurveyMonkey**

We sometimes use online software such as SurveyMonkey to conduct surveys. If you click through to SurveyMonkey or similar websites, they may use both session cookies and persistent cookies. See SurveyMonkey privacy statement for more information.

### **Mailchimp**

We also use an online form service provided by Mailchimp, which uses 'session cookies'. These retain information for the duration of your visit but are not stored once your web browser is closed.

### **How we keep your data safe and who has access to it**

We place great importance on the security of your personal information and will always take appropriate precautions to protect it.

We ensure that there are appropriate technical controls in place to protect your personal details. We always ensure only authorised personnel (for example our staff, volunteers or contractors) have access to your information, and that they are appropriately trained to manage your data.

All of our online forms are protected by encryption. We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate and up to date and kept only for the purposes for which it was collected.

Despite all of our precautions, no data transmission over the internet can be guaranteed to be 100% secure. While we strive to protect your personal information, we cannot guarantee the security of any information you disclose to us online, and you must understand that you do so at your own risk.

### **Who we share your personal data with**

We use external organisations that collect and/or process personal data on our behalf. Before working with these companies we perform rigorous checks to ensure they meet all relevant regulations and legislation. We always implement a contract with our suppliers, which imposes robust data protection requirements, including the provisions of this policy, and seeks to provide maximum protection of your personal details.

If you would like to receive further information about our safeguards, please contact us by email or post.

We may legally be required to disclose your details if required to by the police or for regulatory reasons. We will only ever share your data in other circumstances if we have your consent to do so.

### **How we keep your information up to date**

Where possible, we try to keep your records up to date. However, we really appreciate it if you let us know if your contact details change.

### **How long we keep your information for**

We will only keep your personal information for as long as is necessary for the purposes outlined in this statement, and in any case within limits set out by law. However, where it is possible we may anonymise information so that it cannot be linked back to an individual, in which case it may be kept for longer.

Income from gifts in wills is vital to the running of the charity. We may keep data you provide to us for a period sufficient to enable us to carry out administration of such gifts and communicate effectively with the families of people leaving us gifts in their will. This also enables us to identify and analyse the source of legacy will income we receive.

### **Our legal basis for processing your information**

We ensure that we have a lawful basis to collect and use your personal data.

In many cases we will seek explicit consent to process your personal and special category data. We will also often process personal data for the performance of a contract. In some instances we may process your information outside of these legal bases when we are legally allowed to do so. This will only be where it is in our legitimate interests to do so and where we are confident that such processing is not likely to unduly prejudice your interests, rights and freedoms.

The law allows for six grounds for processing people's personal data, of which three are relevant for our activities:

- we process your information on the basis of **your consent**
- we process your information on the basis of a **contractual relationship**
- we process your information on the basis of having **legitimate interest** to do so

**Consent:** We will process your data if you have provided consent: this will include storing your information and using this to manage our relationship with you e.g. sending membership information, event attendance details etc.

**Contractual relationship:** The vast majority of our relationships with our supporters and members are voluntary as opposed to contractual, but there may be occasions where we have agreed to send you information in exchange for payment or a commitment to raise funds on our behalf – in which case we will do so unless you have told us you do not wish to receive it.

**Legitimate Interests:** In some cases we will make a balanced judgement on whether we have a legitimate interest for storing and processing your data and using it to contact you without having gathered your explicit consent. The law allows for us to collect and use your data if it is necessary for a legitimate business interest, as long as we use it in a fair and balanced way that does not unduly prejudice your rights.

Our Legitimate Interests for processing personal data include:

#### **Governance**

- Delivery of our charitable purpose
- Statutory reporting
- Reporting criminal acts and compliance with law enforcement agencies
- Internal and external audit for financial or regulatory compliance purposes

#### **Operational Management**

- Physical security, IT and network security
- Processing for historical or statistical purposes

#### **Publicity and Income Generation**

- Conventional direct marketing and other forms of marketing, publicity or advertisement
- Personalisation used to tailor and enhance customer and supporter experience in our offline and online communications
- Analysis, targeting, and segmentation to maximise the cost-effectiveness and reach of our communications
- Processing for research purposes (including marketing research)

#### **Purely Administrative Purposes**

- Delivery of requested products or information packs
- Administration of Gift Aid
- Thank you communications and receipts
- Administration of existing financial transactions
- Maintaining 'Do not contact lists' (suppression lists)

#### **Financial Management and Control**

- Processing of financial transactions and maintaining financial controls
- Prevention of fraud, misuse of services, or money laundering
- Enforcement of legal claims including debt collection via out-of-court procedures
- Administration of supporters' estates and/or gifts in wills where we have been named as beneficiary or executor

In extreme situations, we may share your personal details if we believe that it is in your 'vital interests' to do so (e.g. if you are taken ill at one of our events we might share your details with emergency services), or if we are compelled by law to do so.

### **Communication Preferences**

Some of the communications you receive from us will be part of your engagement with the Swindon and North Wilts Deaf Children's Society: for example, membership information. You can unsubscribe to these communications at any time. Other communications you will need to opt-in to and these are offered when you first sign up with us.

### **Your consent and choices**

Where we are processing your personal data on the basis of consent that you have given us, you are entitled to withdraw that consent at any time such that we can no longer rely on it as a basis for continuing to process your personal information.

By providing us with your personal information, you consent to the collection and use of this in accordance with this Privacy Statement. This includes any sensitive information (special category data) about you or your child's health which we may need to gather, for example if you or your child are attending any of the events that we offer to support deaf children.

You remain in control of your personal information. In particular, if you have any of the following requests please let us know:

- i) If you do not want us to contact you at all, or for a particular purpose: e.g. if you do not wish to be contacted for fundraising or campaigning purposes
- ii) If you want to update the contact details and preferences we have
- iii) If you would prefer us not to use the information we hold about you to build a profile of your likely interests, preferences and likely giving behaviour
- iv) If you would prefer us not to look up additional information about you.

You can let us know your preferences at any time by emailing [swindon@ndcsgroup.org.uk](mailto:swindon@ndcsgroup.org.uk).

### **Your rights**

You retain control of how we use your data and you have the right to ask us to stop processing your personal information, which we will do. In some circumstances, we may legally be required to retain your personal information for audit purposes. However, this will be discussed with you depending on your requirements. Please contact us by email at [swindon@ndcsgroup.org.uk](mailto:swindon@ndcsgroup.org.uk)

You also have the right to request a copy of the information we hold about you. If you want to access your information, please contact: Chairperson, Swindon & North Wilts DCS, Hergest Ridge, Cues Lane, Bishopstone, Swindon SN6 8PP or email: [swindon@ndcsgroup.org.uk](mailto:swindon@ndcsgroup.org.uk) - A small administrative charge may apply.

Under the General Data Protection Regulation you are also granted a number of additional rights.

If you wish to exercise any of your rights, as listed below please contact us at [swindon@ndcsgroup.org.uk](mailto:swindon@ndcsgroup.org.uk) for:

- a) Access to your personal information;
- b) Objection to processing of your personal information;
- c) Objection to automated decision-making and profiling;
- d) Restriction of processing of your personal information;
- e) Your personal data portability;

- f) Rectification of your personal information; and
- g) Erasure of your personal information.

If you make a request relating to any of the rights listed above, we will consider each request in accordance with all applicable data protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be excessive in nature.

Upon successful verification of your identity, you are entitled to obtain the following information about your own personal information:

- a) The purposes of the collection, processing, use and storage of your personal data.
- b) The source(s) of the personal information, if it was not obtained from you.
- c) The categories of personal data stored about you.
- d) The recipients or categories of recipients to whom your personal data has been or may be transmitted, along with the location of those recipients.
- e) The envisaged period of storage for your personal data or the rationale for determining the storage period.
- f) The use of any automated decision-making and/or profiling.

You can make the above request by emailing [swindon@ndcsgroup.org.uk](mailto:swindon@ndcsgroup.org.uk) or by writing to:

Chairperson, Swindon & North Wilts DCS, Hergest Ridge, Cues Lane, Bishopstone, Swindon SN6 8PP

For more information on these rights please read the relevant guidance issued by the ICO at <https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/individuals-rights/>

If you would like to make a complaint about how we process your personal data, please contact our Chairperson.

If you are not happy with how your complaint is dealt with, you should contact the Information Commissioner's Office. Alternatively, you are entitled to make a complaint to the Information Commissioner's Office without first referring your complaint to us. For further information please see the Information Commissioner's guidance.

### **Changes to this privacy policy**

This policy may change from time to time. If we make any significant changes to this policy, we will publicise these changes clearly on our website or contact you directly with more information. Please revisit this policy each time you consider giving your personal information to the Swindon and North Wilts Deaf Children's Society.

This privacy statement was last updated on 9<sup>th</sup> January 2019