

## PRIVACY NOTICE

for

### Home-Start Royston, Buntingford and South Cambridgeshire (HSRBSC)

At HSRBSC, we are committed to protecting and respecting your privacy.

This Privacy Notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Any questions regarding this notice and our privacy practices should be sent by email to [admin@hsrsc.org.uk](mailto:admin@hsrsc.org.uk), or by writing to the Scheme Manager at Unit 6, Valley farm, Station Road, Meldreth, Royston, SG8 6JP. Alternatively, you can telephone 01763 262262.

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#### Who are we?

HSRBSC is committed to protecting your personal information and to being transparent about what information we hold. HSRBSC understands its obligations to you to help you understand how and why we process your personal data. We will only do so in accordance with all applicable UK data protection legislation, including the General Data Protection Regulation. In this notice 'Home-Start', 'we', 'us' or 'our' means:

- Home-Start Royston, Buntingford & South Cambridgeshire (incorporated as Home-Start Royston & South Cambridgeshire) is a charitable company limited by guarantee.
- Company no. 5183873
- Charity no. 1105385 Registered office: Unit 6, Valley Farm, Station Road, Meldreth, Royston, SG8 6JP

*We are registered with the Information Commissioner. Our registration number is: Z9086514*

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## The personal data we collect from you, how we collect and how we use it

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### Your Rights

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that are likely to apply to you when we are processing your personal information:

#### **Right of access**

You have a right to request access to the personal data that we hold about you.

You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, please contact the address provided below, telephone or e-mail

#### **Right to have your inaccurate personal information corrected**

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us so we're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or if you believe any of the other information we hold is inaccurate or out of date, please contact us via email, telephone or post (see below).

#### **Right to restrict use**

You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we're not lawfully allowed to use it.

#### **Right of erasure**

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, we will do so as far as we are required to by law. In many cases, we will anonymise that information, rather than delete it.

#### **Right for your personal information to be portable**

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, for example, when you shop from our website, you may ask us to provide it to you or another service provider in a machine-readable format.

#### **Right to object**

You have the right to object to processing where we are using your personal information based on legitimate interests, (or for statistical/research purposes). In these circumstances we will consider your request against our legitimate reasons for continuing to process your information.

You have an absolute right to object to direct marketing. If you wish to opt-out of receiving marketing materials from us at any time, please contact the address below.

If you want to exercise any of the above rights, please contact us. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's [Information Commissioner's Office](#).

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### **Keeping your information safe**

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it, such as Firewalls, anti-virus protection and encryption. We undertake regular reviews of who has access to information that we hold to ensure that your info is only accessible by appropriately trained staff, volunteers and contractors.

Where HSRBSC engages third parties to process personal data on our behalf, those third parties do so on the basis of our written instructions to them; are under a duty of confidentiality; and are obliged to implement appropriate technical and organisational measures to ensure the security of data. They are also not allowed to use your personal data for their own purposes.

HSRBSC has in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a personal data breach when legally required to do so.

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### **Keeping your information up to date**

We take reasonable steps to ensure your information is accurate and up to date. We really appreciate it if you let us know when your contact details change.

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### **Young People**

We are concerned to protect the privacy of young people under the age of 18. We will explain what data is held and how that data is being processed. We take responsibility for identifying the risks of processing data and mitigate these risks accordingly.

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### **Vulnerable circumstances**

We are committed to protecting vulnerable supporters, customers and volunteers, and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

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### **Changes to this notice**

Any changes we may make to this notice in the future will be posted on this website so please check this page occasionally to ensure that you are happy with any changes. If we make any significant changes we will make this clear on this website.

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### **Review of this Privacy notice**

We keep this notice under regular review. This notice was last updated in January 2021.

For further information on each of these rights, including the circumstances in which they apply, visit the Information Commissioner's Office ("ICO") website at <https://ico.org.uk/for-the-public>

If you would like to exercise any of the rights, please email, call or write to us using the details in 'How to contact us' below, let us have enough information to identify you, let us have proof of your identity and address, and let us know the information to which your request relates.

### **How to complain**

Please report any complaint to the details set out in 'How to contact us' below. We hope we can resolve any query or concern you raise about our use of your information. You also have the right to lodge a complaint with the ICO who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **How to contact us**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you at Home-Start Royston, Buntingford & South Cambridgeshire, Unit 6, Valley Farm, Station Road, Meldreth, Royston, SG8 6JP, [admin@hsrsc.org.uk](mailto:admin@hsrsc.org.uk) or 01763 262262.

Our Data Protection Officer/Lead is Andrew Xia, Trustee.

# APPENDICES

## 1. Human Resources (a) employees

### How do we collect information from you?

The information we hold about you is primarily information you provided when applying for your job, supplemented by information generated in the course of your employment.

We will collect this information in a variety of ways including directly from you, and from third parties as outlined below:

- Recruitment Agencies
- Former employers or other referees
- Professional bodies relevant to your profession
- Credit Reference Agencies
- Disclosure and Barring Service or Disclosure Scotland
- Occupational Health providers
- HMRC, DWP and other statutory agencies

### What type of information is collected from you?

- Your name, address, contact details
- Unique personal identifiers, e.g., date of birth, photographs
- Your attendance at Home-Start Royston, Buntingford & South Cambridgeshire
- Personal data provided by you for a specific purpose, e.g., disability
- Copies of passports, visas and any other documentation required to ensure compliance with Home Office requirements
- Details of your education and qualifications
- Your application and/or CV
- Job title, grade and salary
- Reporting and managerial responsibilities
- Details of your career
- References
- Your contract of employment
- Supervision notes
- Performance reviews
- Disciplinary, grievance and capability procedures
- Accidents at work
- Details about any medical conditions
- Details of any training received
- Time and attendance details
- Bank account details for salary and pension purposes
- Confirmation of satisfactory pre engagement checks e.g. DBS where permitted under local law
- Interview tests/results

### Sensitive personal data held by HSRBSC

We require to use some personal data that is considered under data protection law to be 'special category data' for example, in relation to your health or ethnicity. We also use some other data which you may consider to be sensitive such as financial information. The information we hold is that which you provide to us (e.g. you may give us information when you applied for your role, or in response to staff surveys)

Records may contain:

- Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
- Health issues requiring adaptations to your working environment
- Leaves of absence such as maternity leave, sickness absence, etc
- Health and safety incidents, accidents at work and associated records.

### **How and why is your information used?**

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative and legal obligations, (e.g., for tax purposes).

### **How long is your information kept for?**

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. Data will be securely destroyed when no longer required. Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of employment and date of birth) to ensure that we do not contact you or process your data again inadvertently in future, and to maintain your record for employment record purposes.

We reserve the right to judge what information we must continue to hold to be able to fulfil our contract with you or to fulfil our obligations to third parties e.g., HMRC

### **Who has access to your information?**

Personal data, including sensitive personal data, may be shared with members of staff, including trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that special category personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without obtaining your consent. This will only occur in compliance with data protection law if it is necessary to protect your vital interests or the vital interests of another person, or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations. We may disclose certain personal data to third parties. These third parties, and the purpose for sharing the information, are set out below:

- Relevant data may be shared with your next of kin but only with your consent or in an emergency
- Relevant data may be shared with the Home-Office, UK Visas and Immigration for the purpose of proving eligibility to work in the UK
- Data may be shared with reputable “data processors” for the purpose of sending communications, e.g., staff surveys
- With your permission we may share information about you for publicity and marketing purposes online, in print and on social media

Otherwise, we do not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

### **Lawful Processing**

The lawful basis for processing your personal data is necessary for the performance of your employment. There is a contractual requirement for you to provide much of the information detailed. Without this we are unable to fulfil our obligations which could result in termination of contract.

## 1. Human Resources (b) Trustees and volunteers

### How do we collect information from you?

The information we hold about you is primarily information you provided when applying for a volunteer/trustee role. Further information may be recorded during your time with Home-Start

We will collect this information in a variety of ways including directly from you, and from third parties as outlined below:

- Former employers or other referees
- Professional bodies relevant to your profession
- Credit Reference Agencies
- Disclosure and Barring Service or Disclosure Scotland
- Occupational Health providers
- HMRC, DWP and other statutory agencies

### What type of information is collected from you?

- Your name, address, contact details
- Unique personal identifiers, e.g., date of birth, photographs.
- Your attendance at HSRBSC
- Personal data provided by you for a specific purpose, e.g., disability, medical conditions
- Copies of passports, visas and any other documentation required to ensure compliance with Home Office requirements
- Your application and/or CV
- References
- Confirmation of satisfactory pre-engagement checks e.g., DBS where permitted under local law
- Supervision notes
- Accidents at work
- Details of any training received
- Time and attendance details
- Bank account details for expenses purposes
- Interview tests/results

### Sensitive personal data held by HSRBSC

We require to use some personal data that is considered under data protection law to be 'special category data' for example, in relation to your health or ethnicity. We also use some other data which you may consider to be sensitive such as financial information. The information we hold is that which you provide to us (e.g. you may give us information when you applied for your role, or in response to staff surveys)

Records may contain:

- Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
- Health issues requiring adaptations to your working environment
- Leaves of absence such as maternity leave, sickness absence, etc
- Health and safety incidents, accidents at work and associated records.

### How and why is your information used?

We are required to use your personal data for various legal and practical purposes for the administration of your volunteering role.

### **How long is your information kept for?**

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. Data will be deleted when no longer required.

### **Who has access to your information?**

Personal data, including sensitive personal data, may be shared with members of staff, including trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that special category personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without obtaining your consent. This will only occur in compliance with data protection law if it is necessary to protect your vital interests or the vital interests of another person, or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations. We may disclose certain personal data to third parties. These third parties, and the purpose for sharing the information, are set out below:

- Relevant data may be shared with your next of kin but only with your consent or in an emergency
- Relevant data may be shared with the Home-Office, UK Visas and Immigration for the purpose of proving eligibility to volunteer in the UK
- Data may be shared with reputable “data processors” for the purpose of sending communications, e.g., staff surveys
- With your permission we may share information about you for publicity and marketing purposes online, in print and on social media

Otherwise, we do not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

### **Lawful Processing**

The lawful basis for processing your personal data is necessary for the performance of your engagement as a volunteer. There is a legal obligation for you to provide much of the information detailed. Without this we are unable to fulfil our obligations.

## **1. Human Resources (c) job candidates**

### **How do we collect information from you?**

As part of our candidate application and recruitment process we collect, process and store personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application, assessment, pre-employment checks and your worker permissions.

We will collect this information in a variety of ways including directly from you, and from third parties as outlined below:

- Former employers or other referees
- Recruitment agencies
- Credit Reference Agencies
- Disclosure and Barring Service or Disclosure Scotland

### **What type of information is collected from you?**

The following are some examples of the type of information we may process (there is a full list in the schedule at the end of this notice)

- Personal details such as name, address, date and place of birth
- Work history/job data, previous employers, positions, dates
- Compensation; salary, benefits, bonuses
- Education and work history including professional qualifications and skills



- Employer feedback/references, to include regulated references where necessary
- Nationality, visa, right to work information (e.g., passport, National Insurance number)
- Results of pre-employment checks, such as DBS/Access NI checks where permitted under local law
- Assessment results, such as results from any interview exercise, or video or telephone assessment

During the process we also capture some personal data that is considered under data protection law to be 'special category data' about you, e.g., disability information. We do this in order to make reasonable adjustments to enable all candidates to apply for jobs with us, to be able to take online/telephone assessments or interviews, to attend interview/assessment centres and to ensure that we comply with regulatory obligations with regard to hiring.

### **How and why is your information used?**

In order to manage your application, we need to process certain personal information about you. The purposes for this are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements, so not all of the purposes set out below will apply to you all of the time.

- Application: Application form or CV, name, address, employment history, academic and professional qualifications, age, diversity, (i.e., gender, ethnicity, disability, sexual orientation), nationality, previous disciplinary matters.
- Assessment: CV, interview (face to face, telephone or video), exercise or test.
- Pre-employment: Right to work in the UK, qualifications, references

### **How long is your information kept for?**

For unsuccessful candidates personal information will be retained for 6 months following the recruitment process. For successful candidates all personal information collected as part of the recruitment process will be transferred to an employee personnel file and will be retained for six years following termination of employment

### **Who has access to your information?**

The recruitment process will involve:

- Assessing and progressing your application
- Assessing your suitability (skills, strengths and behaviours) for the role
- Activities needed to complete on-boarding and screening processes should your application be successful

To enable these processes your personal information may be shared internally. The information shared is limited to what is required by each individual to perform their role in the recruitment process. Your personal information may be shared with the following: -

- The hiring manager
- The line manager
- The short-listing and interview panels
- The HR lead Trustee
- The IT manager
- Finance (if application successful)

Our HR and recruitment systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of personal information does not occur. This is done in line with the Data Protection & Confidentiality policies.

## **Lawful Processing**

### **Pre-employment checks**

As part of the recruitment and selection process we will carry out pre-employment checks. These checks are only performed on candidates who have been selected for a role. Your consent will be requested before pre-employment checks are carried out.

### **Processing conditions**

Our entitlement to process your personal information is governed under data protection law by a number of processing conditions. This means we may rely on more than one of these conditions in order to process elements of your personal information throughout the recruitment process.

- We will process your personal information where it is required by law or regulation, or it is in the legitimate interest of the applicant or our organisation.
- During the course of your application, it may also be necessary for us to process your sensitive personal information as per the detail in above or Schedule 1 below.

### **Schedule 1 - Full list of information that we may process**

- Name, work and home contact details
- Date and place of birth
- Education and work history
- \*Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
- \*Health issues requiring adaptations to working environment
- Job title, grade and job history
- Employment contract related information (including compensation, location, hours of work, etc)
- Reporting and managerial relationships
- \*Leaves of absence (such as maternity leave, sickness absence)
- Photographs
- Disciplinary/grievance records
- Time and attendance details
- Bank account details for salary payment purposes
- Expenses such as travel and expenses
- Skills and qualifications
- Training history and plans
- Results of original and ongoing employee screening (where relevant)
- \*Health and safety incidents, accidents at work and associated records
- Face to face interview notes
- Audio recordings of interviews
- Video recordings of interviews
- Interview test/exercise results

\*These categories of information might potentially include some special category personal information. Special category personal information is collected where we have a legal obligation to do so or if you choose to disclose this to us during the course of your relationship with us.

## 1. Human Resources (d) referees

### How do we collect information from you?

Your personal details have been provided to us by another person (applicant) who has indicated you as a referee. We must have a legal basis for processing your personal data. We will only use your personal data in accordance with the terms of our privacy notice.

### What type of information is collected from you?

- Name
- Name and address of company, position and relationship to applicant (when providing an employment reference)
- Personal address and relationship to applicant (when providing a personal or character reference)
- Telephone number and/or email address

### How and why is your information used?

We will collect your personal data and process your personal data for the purpose of obtaining references for our applicant.

### How long is your information kept for?

We will retain your personal data along with the applicant's data for as long as is necessary. Different laws require us to keep different data for different periods of time, which are detailed in our Data Protection Policy appendix 1 Record retention periods.

### Where the applicant is unsuccessful

If the applicant is unsuccessful after you have provided a reference the data will be kept for 6 months. The electronic data will then be deleted and the paper data confidentially shredded.

### Where the applicant is successful

If the applicant is successful the data will be transferred to their personnel file which will be kept for six years after the end of their employment. The electronic data will then be deleted and the paper data confidentially shredded.

### Who has access to your information?

Where we need to share your personal data, we require the recipients to treat your information as confidential and ensure the continued protection of your data whilst in their possession. We will process your personal data with the following recipients: -

- a) The hiring manager
- b) The line manager
- c) The HR lead Trustee
- e) The IT manager
- d) Relevant Trustees
- e) Third party, where necessary, to protect the applicant's vital interest, e.g., emergency services

### Lawful Processing

The legal basis we rely upon when processing your personal data are: -

**Legitimate Interest** To fulfil our recruitment requirements which obtaining references is a vital part of in order to ensure we are recruiting the best and most reliable people for our organisation

## 2. Website visitors

We are committed to safeguarding the privacy of our website visitors and service users; in this notice we explain how we will handle your personal data. We will ask you to consent to our use of cookies in accordance with the terms of this notice when you first visit our website.

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### In this section we have set out:

- How we collect information from you
- How and why is your information used
- Lawful Processing

### Usage Data

We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

### Account Data

We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

### Profile Data

We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, and social media ids. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent.

### Service Data

We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include name, address, email address, details of donations made, or items ordered. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

### Publication Data

We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent.

### Enquiry Data

We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.

### **Transaction Data**

We may process information relating to transactions, including donations or purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

### **Notification Data**

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

### **Correspondence Data**

We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

### **Other**

We may process any of your personal data identified in the other provisions of this notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. Please do not supply any other person's personal data to us, unless we prompt you to do so.

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### **Who has access to your information?**

We may disclose your personal data to any member of our group of charities in the Home-Start network insofar as reasonably necessary for the purposes set out in this notice.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

Financial transactions relating to our website and services are handled by Virgin Money Giving and PayPal. We will share transaction data with our payment service providers only to the extent necessary for the purposes of processing your donation, refunding such donations and dealing with complaints and queries relating to such donations and refunds. You can find information about the payment services providers' privacy policies and practices at:

- Virgin Money Giving (URL <https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp>)
- PayPal (URL <https://www.paypal.com/ie/webapps/mpp/ua/privacy-full>)

Your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data

we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the follow will apply:

1. Your data will be made available to our website provider
2. The data that may be available to them include any of the data we collect as described above.
3. Our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA.
4. They will store your data for a maximum of 7 years.
5. This processing does not affect your rights

In addition to the specific disclosures of personal data, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **How long is your information kept for?**

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain and delete your personal data as follows:

- (a) All personal data will be retained for a maximum of (*seven years*) following *the date it was submitted*, at the end of which period it will be deleted from our systems, unless requested by users.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **Third party websites**

Our website includes hyperlinks to, and details of, third party websites. *This privacy notice only governs our websites, and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy notice of that website before sharing any personal or financial data*

### **Social Media**

*We operate a number of social media pages including Facebook, Twitter, LinkedIn, YouTube and Instagram. Although this notice covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy notice of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.*

### **Personal data of children**

Our website and services are targeted at persons over the age of 16. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

### **About cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

### **Cookies that we use**

We use the following cookies for the purposes outlined below:

#### **Google Analytics**

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages, what searches they may have done on the website. These cookies do not collect personally identifiable information. All information these cookies collect is aggregated and therefore anonymous.

This data helps us to understand:

- Which pages people visit on the site
- Which internet browsers are being used
- What is popular on the site

The information gathered relating to our website is used to create reports about the use of our website.

You can find out more about Google's cookies on their privacy policy:

<http://www.google.com/intl/en/policies/privacy/>

You can also install the Google Analytics Opt-out tools in your browser:

<https://tools.google.com/dlpage/gaoptout>

#### **Google maps**

These are session cookies that remember preferences you have when viewing a map which is on the website.

#### **WordPress**

The website is built with WordPress which uses a number of plugin applications. Some of these applications use cookies and some of them are persistent and remember choices you have made on the website. Others are session cookies which expire on exit from the browser.

#### **3rd Party cookies**

We do not use any cookies through third parties for advertising or pushing advertising content to you. This is an advert free website.

#### **Cookies used by our service providers**

Our website service providers use cookies, and those cookies may be stored on your computer when you visit our website.

#### **Managing cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

**What happens if I do not accept cookies on my browsing device?** Some of the functions on the website may not work without cookies being enabled or you may see a reduction in functionality. Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

### **3. Our Supporters - Fundraising & Communications**

#### **How do we collect information from you?**

We obtain information about you in the following ways:

##### *Information you give us directly*

For example, we may obtain information about you when you take part in one of our events, make a donation, apply to volunteer for us, purchase products and services or when you register to receive one of our regular newsletters.

##### *Information you give us indirectly*

Your information may be shared with us by third parties, which might include:

- independent event organisers, for example the London Marathon and fundraising sites like Just Giving,
- professional fundraisers; and
- subcontractors acting on our behalf who provide us with technical, payment or delivery services, our business partners, advertising networks analytics providers and search information providers.

#### **What type of information is collected from you?**

The personal information we collect, store and use might include:

- your name and contact details (including postal address, email address and telephone number);
- your date of birth;
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location;
- your bank or credit card details. If you make a donation online or make a purchase, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions;
- information as to whether you are a UK taxpayer so we can claim gift aid; and
- any other personal information shared with us.

Data protection laws recognise certain categories of personal information as ‘special category’ and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We do not usually collect special category data about you unless there is a clear and valid reason for doing so and data protection laws allow us to. For example, we may ask for your health information if you are taking part in one of our fundraising running events.

Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for.

#### **Public Information**

We supplement information on our supporters with information from publicly available sources such as annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a fuller understanding of someone’s interests and support. For more information, please see the section on ‘Building Profiles’ below.



## **How and why is your information used?**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for families and the exciting products and services you can buy, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

## **Email/text/Phone/Post**

We will only send you marketing and fundraising communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails. We may send you marketing and fundraising communications by post unless you have told us that you would prefer not to hear from us.

## **How long is your information kept for?**

We are committed to putting you in control of your data, so you are free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g., health/safety and tax/accounting purposes). We review our retention periods on a regular basis.

## **Who has access to your information?**

We do not sell or rent your information to third parties.

We do not share your information with third parties for marketing purposes.

However, we may disclose your information to third parties in order to achieve the other purposes set out in this notice. These third parties may include:

### **Third parties working on our behalf**

We may pass your information to our third-party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. Please be reassured that we will not release your information to other third parties unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. We will not release your information to third parties for them to use for their own direct marketing purposes unless you have requested us to do so.

### **Third Party Product Providers we work with**

Our trusted third-party product providers provide a range of quality and reliable products and services designed to meet the needs of families. When you enquire about or purchase one or more of these products, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a joint controller of your information and therefore we advise you to read their Privacy Notice. These third-party product providers will share your information with us which we will use in accordance with this notice.

## **Lawful Processing**

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

### **Specific Consent**

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

### **Performance of a contract**

Where we are entering into a contract with you or performing our obligations under it, like when you buy Home-Start named products and services.

### **Legal obligation**

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission or Fundraising Regulator, for example, in relation to anti-money laundering purposes.

### **Vital interests**

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue which requires us to share your information with the emergency services.

### **Legitimate interests**

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running a charitable organisation in pursuit of our aims and ideals. For example, to:

- provide our services to support you and your family;
- send postal communications which we think will be of interest to you;
- conduct research to better understand our supporters and to improve the relevance of our fundraising;
- understand how people choose/use our services and products;
- determine the effectiveness of our services, promotional campaigns and advertising;
- monitor who we deal with to protect the charity against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

We may also use your personal information to detect and reduce fraud and credit risk.

## 4. CharityLog

### How do we collect information from you?

We use CharityLog to store information and track outcomes from work undertaken with families being supported

### What type of information is collected from you?

In the course of their time a family being supported will have some of their personal details kept securely in electronic format on the CharityLog system. This information can include:

- Carers and children's date of birth, gender and ethnicity.
- Details of other professional involved i.e., health visitor, GP, social worker.
- The needs of family i.e., any medical or social issues.
- How a family is feeling about being supported by us.
- Levels of coping on key areas of family life.
- Other areas of coping, development or issues which are directly related to a current project or funder.
- Changes to health and social needs.
- What a volunteer has been doing during his or her time with family.
- A risk assessment to highlight any potential risks to us or our volunteers e.g., on-going neighbour dispute, dogs, possible parking issues etc

### How and why is your information used?

Funders may request that we provide them with data to prove that we are doing what we said we would do to help support families. At **no time** are your personal details shared. All information given is in statistical format and on occasion, we may provide an anonymised case study of a family. No names or identifiable information is given, but this is an important way to show what a difference our support can make.

### How long is your information kept for?

We will not keep the information for longer than necessary.

### Who has access to your information?

We limit access to CharityLog data to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### Lawful Processing

CharityLog is used under the lawful basis that it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

### Further Information on CharityLog

**Access control** - Access to data within CharityLog is governed by access rights. Privileges can be configured and managed to define multi-level access rights.

**Authentication** - Users are authenticated through username and password which is cross checked against an SQL (Structured Query Language) table within which the data is encrypted. **Auto logout** - User are automatically logged out of CharityLog after specific inactivity periods have lapsed.

**Layered Security** - CharityLog has multi-level access procedures including a username and password protection process.

**3rd Party Usage** - All data collected by CLOG is consented to an anonymization process in order for 3rd party statistical analysis. 3rd parties are mandated to provide their own signed GDPR compliance statements and privacy policies.

**Development** - New functionality is project planned by Dizion LTD who prioritise additions and changes to the system. Work is planned and authorised within agreed resources and timescales.

## 5. FAMILIES USING OUR SERVICES

### How do we collect information from you?

#### *Information you give us directly*

We collect information about you and family members when you register with us for any of our services and also when you start to receive our services. We collect information when you voluntarily complete service user surveys, provide feedback and participate in events.

#### *Information from our staff*

Our staff will create records about you while delivering services, for example by way of notes added to your case file

#### *Information we receive from other sources*

Your information may be received by us from third parties, which might include:

- agencies who are referring you to us;
- professionals and other support agencies, such as health visitors, social care professionals, other voluntary organisations or charities
- members of your family who are using Home-Start services

### What type of information is collected and used about you?

The information we collect and use will include personal data and sensitive data (known as 'special category data' in data protection law).

These records may include the following information relevant to you, your partner and the children you care for and anyone else who is part of your household:

- your name and contact details (including postal address, email address and telephone number);
- your date of birth;
- contact details and background information of other members of your family
- your Next of Kin, GP and Health Visitor contact details
- contact we have had with you, including home visits
- income and financial details
- employment information
- children's information may include schools or nursery attended
- information from people who are involved with your family, such as schools, health professionals, social services and relatives and whether any children are subject to child protection/child in need plans or have other assessment needs
- information about lawyers or other representatives we may encounter in the delivery of services
- information about your use of our website and about the device used to access it, for instance your IP address and geographical location;
- any other personal information shared with us.

Data protection laws recognise certain categories of sensitive personal information as 'special category' and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We may collect and use the following types of special category information:

- disabilities, special educational needs or health condition
- details and records of medical treatment and medications
- your race, religion or beliefs or political views
- information about an individual's sex life or revealing an individual's sexual orientation
- criminal convictions that have been committed against an individual or which an individual has committed

## **How and why is your information used?**

We will only collect and use the minimum necessary information needed for us to provide you with our services and for staff to deliver and provide appropriate support to meet your needs.

We use this information only to the extent necessary to provide the services to you that you have requested from us unless there are exceptional circumstances, such as when the health or safety of a child or others is at risk, or other situations where the law requires the disclosure of information.

If you do not provide us with information that we ask for and that we require, we may not be able to provide services to you. If you are uncomfortable about disclosing certain information to us or if you have any concerns or queries about why we require certain information, we are happy to discuss this in further detail with you.

In limited circumstances, we may ask for your consent to use your information (for example, for your experience with us to be used in Home-Start materials or on our website). In these circumstances, we will always ask for your explicit consent beforehand, and we will tell you how you can withdraw your consent if you change your mind (which you can do at any time).

## **Receiving communications from us by email/text/phone/post**

You can choose if you wish to receive information from us or not. There are boxes you can tick to show your choices on the form which includes information about you and your family. If you want us to tell you more about our work and what we can offer you, please tick the relevant boxes on the form.”

If you do not want to be contacted for marketing purposes we will not do that. Your details will be kept on a list so that we can contact you for other reasons. For example, to change an appointment or let you know about a change at our office.

We're committed to putting you in control of your data so you're free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time using: [admin@hrs.org.uk](mailto:admin@hrs.org.uk), or by telephone: 01763 262262, or post: Unit 6, Valley Farm, Station Road. Meldreth, Royston SG8 6JP.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are notifying you of an office closure or a change to your appointment time.

## **Where is your information kept and long is it kept for?**

Information is retained in secure electronic and paper records and access is restricted to only those who need to know. Our guiding principle is that we are holding your information in strict confidence and in accordance with the law.

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for depends on our requirements to provide our services and run our business or to comply with the law. Case records are generally kept on our live system for up to 1 year, after which time they are anonymised so that any identifiable information is removed. In certain circumstances we may be required to keep records for a longer period, depending on the nature of the case and whether or not we are subject to separate legal obligations which require us to do this.

## Who has access to your information?

In order to provide you with our services, we will share your information internally within Home-Start on a need-to-know basis, to ensure we are providing you with a good service. We may also share your personal information with some or all of the following parties, but we will always do this in compliance with data protection law:

- other charities and public sector organisations that may have referred you to us, may be providing services to you or that we may be working in partnership with
- health and education professionals (such as health visitors or head teachers)
- other family members (where you are comfortable with this)
- local council social work departments
- the Police, Courts or Charity Commission
- safeguarders and other parties in connection with child or adult protection
- lawyers or other representatives that may be acting on your behalf
- statutory bodies in connection with legal and formal processes.
- third parties working on our behalf (for example, to support our IT systems, or to send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own purposes.

We do not sell or rent any of your information to third parties.

We do not share any of your information with third parties for marketing purposes unless you have requested us to do so.

We will only share special category information with other organisations where that is necessary for legal reasons, or where there are other substantial public interest grounds.

## Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

### ***Legitimate interests***

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Home-Start as a charitable organisation in pursuit of our aims and ideals. For example, to:

- provide our services to support you and your family;
- send postal communications which we think will be of interest to you;
- conduct research to better understand our customers and supporters and to improve the relevance of our fundraising;
- understand how people choose/use our services and products;
- determine the effectiveness of our services, promotional campaigns and advertising;
- monitor who we deal with to protect the charity against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

***Specific Consent***

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

***Legal obligation***

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission, or we are required to report a crime.

***Vital interests***

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual) or a safeguarding issue which requires us to share your information with the emergency services.

**Our lawful grounds for processing Special Category data**

When we use special category (sensitive) personal information, we require an additional legal basis to do so under data protection law. Our basis for using such information is normally to provide our services of counselling, social care, and safeguarding children and individuals at risk of neglect or physical, mental or emotional harm and for protecting their economic well-being. Sometimes we may use another route available to us at law (for example, if we need to process it for social protection purposes, vital interests, or, in some cases, if it is in the public interest for us to do so).

Privacy Policy updated June 2021