

## Privacy Policy

**Giving Back Crawley is committed to complete transparency on what personal data we collect, why we collect it, how we use it and how we keep it safe. This policy reflects our duties under the General Data Protection Regulation (GDPR) and describes exactly how we process your personal data.**

### **Data Controller**

The data controller responsible for your personal data is:

Giving Back Crawley  
Flat 39 Tomlin Court  
Commonwealth Drive  
Crawley  
West Sussex  
RH10 1AH

Telephone: 07533 994475

Email: [info@givingbackcrawley.org](mailto:info@givingbackcrawley.org)

If you would like any further information or you would like to exercise any of your rights, please do not hesitate to contact us. We aim to acknowledge receipt of all requests within 24 hours but please allow up to 7 days for confirmation.

### **Making a Complaint**

if you feel there has been an infringement of your rights under the General Data Protection Regulation (GDPR), you have the right to make a complaint directly with the Information Commissioner's Office. Further information can be found on the Information Commissioner's Office website <https://ico.org.uk>

## Your Rights

Under the General Data Protection Regulation (GDPR) you have certain rights over the personal data that we hold about you. Below is a plain English summary of your rights:

### 1. Right to be informed

You have the right to know how we are going to use your personal data. We are legally obligated to inform you exactly how we will process your personal data. This privacy policy details all of our personal data processing activities.

### 2. Right of access

You have the right to access your personal data that we hold. This is called a subject access request. If you request a copy of the personal data, we hold on you, we must respond to your request within 28 days.

### 3. Right to rectification

You have the right to have any errors in your personal data corrected. If the personal data we hold on you is incorrect, we will correct it within 7 days of you advising us.

### 4. Right to erasure

You have the right to request that we delete all of the personal data we hold on you. We will delete all personal data within 28 days unless we have a legal or compelling reason for keeping it.

### 5. Right to restrict processing

You have the right to change or restrict how we use your personal data. You can choose at a granular level, which processes are acceptable with your personal data and which are not, there is no 'all or nothing' consent. We will comply with all reasonable requests to bespoke, immediately.

### 6. Right to data portability

You have the right to obtain your personal data from us and reuse it for your own purposes. We will supply a copy of your personal data that we hold within 7 days of you requesting it.

### 7. Right to object

You have the right to object to direct marketing from us and you can opt out of direct marketing at any time. We do not currently carry out any direct marketing.

### 8. Rights in relation to automated decision making and profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling. We do not perform any automated decision making or profiling.

## **Legal Basis for Processing**

Under the General Data Protection Regulation (GDPR) we are only allowed to process your personal data if at least one of the following applies:

**1. Consent**

You have provided specific consent to us using your personal data in a certain way.

**2. Contract**

We need to process your personal data in order to fulfil or enter into a contract with you.

**3. Legal Obligation**

We are legally required to process your personal data.

**4. Vital Interest**

Failing to process your personal data would put you or someone else at risk of harm.

**5. Public Task**

It is in the public interest to process your personal data.

**6. Legitimate Interest**

We have a legitimate interest in processing your personal data.

## **General Information**

We do not process or share any personal data for marketing purposes.

We do not pass personal data to third parties outside the EEA.

Information we deem to be sensitive personal data is not recorded.

Computers and mobile devices that are used to access your personal data, will be password protected and have reasonable protection against data theft.

Personal data is only accessible by trustees and volunteers who have read and accepted this Privacy Policy and our Volunteer Code of Conduct.

## **Photo, Video & Audio**

We occasionally take photos and record video or audio. We will always seek prior consent before taking any photo, video or audio recording of you and we will never publish anywhere without your prior consent.

## **Visiting Our Website**

Our website uses cookies to enhance your browsing experience and for us to analyse web traffic at a very basic level. We only collect anonymous information such as number of visits and approximate geographical location. We do not collect any personal data through cookies, and you can refuse cookies on our website. If cookies are accepted, our cookies expire in 1 week.

## **Phone, SMS and WhatsApp**

We collect your personal data when you phone us or send us a message through SMS or WhatsApp.

What personal data we collect.

Your first name, surname, phone number and any additional personal data you include in your conversation or message.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it.

Legitimate Interest – It is necessary for us to process your personal data in order to respond to you.

How we use your personal data.

To respond to you.

How we share your personal data.

We do not share any personal data collected through phone, SMS or WhatsApp without further consent from you.

How we store your personal data.

Phone calls are not recorded or stored. SMS and WhatsApp messages will be stored electronically on the phone the message was sent to.

How long we keep your personal data.

The length of time we will keep your personal data will depend on the message content. We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for and to fulfil any legal or regulatory obligations.

## **E-mail or Contact Us Form**

We collect your personal data when you send us an e-mail or message through our Contact Us form on our website.

What personal data we collect.

Your first name, surname, e-mail address, phone number (optional) and any additional personal data you include in your message.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it.

Legitimate Interest – It is necessary for us to process your personal data in order to respond to your message.

How we use your personal data.

To keep a record of your message and to respond to it.

How we share your personal data.

We do not share any personal data collected through e-mail or our Contact Us form without further consent from you.

How we store your personal data.

Your message will be received by us as an e-mail and will be stored electronically on our secure e-mail server.

How long we keep your personal data.

The length of time we will keep your personal data will depend on the message content. We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for and to fulfil any legal or regulatory obligations.

## **Social Media**

We collect your personal data when you send us a message through social media.

What personal data we collect.

Your username, first name, surname and any additional personal data you include in your message.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it.

Legitimate Interest – It is necessary for us to process your personal data in order to respond to your message.

How we use your personal data.

To keep a record of your message and to respond to it.

How we share your personal data.

We do not share any personal data collected through our social media without further consent from you.

How we store your personal data.

Your message will only be stored electronically on the social media platform.

How long we keep your personal data.

The length of time we will keep your personal data will depend on the message content. We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for and to fulfil any legal or regulatory obligations.

## **Making a Donation**

We collect your personal data when you make a donation.

What personal data we collect.

Your first name and surname. If you donate through PayPal, they will also provide us with your e-mail address. Through all payment channels you may provide optional additional personal data including your e-mail address, postal address and phone number. We do not have access to your payment details additional than the amount.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it, either directly or through a payment processor.

Legal Obligation – We are required by law to record certain personal data for donations we receive.

Legitimate Interest – It is necessary for us to process your personal data in order to record donations.

How we use your personal data.

To keep a record of your donation and where contact details exist, we will use the details to issue a thank you for the donation.

How we share your personal data.

We may share your first name and surname only, on social media or our website, to publicly thank you for your donation.

How we store your personal data.

The original record of your donation will be stored electronically on our computers and it will be recorded in our accounting software.

How long we keep your personal data.

We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for and to fulfil any legal or regulatory obligations.

## **Gift Aid Declaration**

We collect your personal data when you make a Gift Aid declaration.

What personal data we collect.

Your first name, surname, postal address, e-mail address and tax payer status.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it, either directly or through a payment processor.

Legal Obligation – We are required by law to retain this personal data.

Legitimate Interest – It is necessary for us to process your personal data in order to claim Gift Aid.

How we use your personal data.

To claim Gift Aid on your donation.

How we share your personal data.

We will share your personal data with HMRC to claim Gift Aid.

How we store your personal data.

The original record of your Gift Aid declaration will be stored electronically on our computers and it will be recorded in our accounting software.

How long we keep your personal data.

We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for and to fulfil any legal or regulatory obligations. The current legal requirement is 7 years.

## **Volunteering Enquiry**

We collect your personal data when you enquire about volunteering with us.

What personal data we collect.

Your first name, surname, phone number, e-mail address, town you live in, over 18 years of age confirmation, not a recent service user confirmation, not banned from working with vulnerable adults' confirmation and any additional personal data you include in your message.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it.

Legitimate Interest – It is necessary for us to process your personal data in order to respond to consider you as a volunteer and to respond to you.

How we use your personal data.

To consider your application and to respond to it.

How we share your personal data.

We do not share any personal data collected through volunteering enquiries without further consent from you.

How we store your personal data.

Your message will be received by us as an e-mail and will be stored electronically on our secure e-mail server.

How long we keep your personal data.

We will keep your personal data for 6 months if you do not become a volunteer. We will only keep your personal data for one year after your last volunteering session if you do become a volunteer.

## **Volunteering Declaration**

We collect your personal data when you join us as a volunteer and complete the online Volunteering Declaration.

What personal data we collect.

Your first name, surname, date of birth, postal address, phone number, e-mail address, emergency contact name and phone number, details of any medication or allergies.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it.

Vital Interest – Failing to process your personal data on medication or allergies could put you at risk of harm.

Legitimate Interest – It is necessary for us to process your personal data in order to have you as a volunteer.

How we use your personal data.

To contact you regarding volunteering opportunities, to keep you informed about the organisation, to provide information to medical staff in the event of an incident requiring medical attention. To obtain your declaration that you have read and understood the Volunteering Agreement, Volunteering Code of Conduct and all of the policies of the organisation.

How we share your personal data.

We do not share any personal data collected through a Volunteering Declaration without further consent from you.

How we store your personal data.

Your message will be received by us as an e-mail and will be stored electronically on our secure e-mail server.

How long we keep your personal data.

We will only keep your personal data for one year after your last volunteering session.

## **Using Our Services**

We collect your personal data when you use our service. This may be through our website, through social media, through other individuals or organisations or from you in person.

What personal data we collect.

Your first name, surname, date of birth, phone number, e-mail address, where you live, information about your health and housing status. We may also become aware of additional personal data fortuitously.

Our legal basis for processing your personal data.

Consent – You have consented to us processing your personal data by providing us with it.

Vital Interest – Failing to process your personal data could put you at risk of harm.

Legitimate Interest – It is necessary for us to process your personal data in order to provide services to you.

How we use your personal data.

To assess your eligibility for our different services and potentially refer you to other organisations.

How we share your personal data.

We do not share any of your personal data without further consent from you unless we believe there is a safeguarding issue. We will share information with an organisation that you have signed a release of relevant information consent or information sharing consent with, if we have an information sharing agreement with that organisation. We ask all service users to sign our information sharing consent so that we can talk to other individuals and organisations when we deem it to be beneficial, necessary or we are obligated to.

How we store your personal data.

Your personal data will be stored electronically on our computers. Original copies of signed information sharing consents will be destroyed.

How long we keep your personal data.

We will only keep your personal data for one year after the last time you use our service.

Enhanced privacy and confidentiality for service users.

Volunteers and trustees will fortuitously gain certain information about service users. Despite this information not being requested and not being received formally, it will always be treated as personal data. This includes even basic details that could help to identify you like your height or age or details that could help to locate you like where you go during the day. We will only share this data when it is entirely in your best interest and where we have an information sharing consent from you. You may also choose to share certain information with us in confidence as part of a conversation. We will only share this data with your permission and where we have an information sharing consent from you.

## **Duty to Disclose Information**

We have a legal duty to disclose certain information and this duty overrides all privacy obligations. If we have grounds to believe that any of the following have occurred or are likely to occur, we will notify the relevant authorities.

Abuse or risk of abuse of a child or adult.

Harm or risk of harm to any child or adult.

Self-harm or risk of self-harm to any child or adult.

Modern-day slavery or risk of modern-day slavery.

Acts of terrorism or risk of acts of terrorism.

Drug trafficking.

Money laundering.