



**CHARTERHOUSE  
IN SOUTHWARK**

## **PRIVACY NOTICE**

This notice (the “Privacy Notice”) provides information about how Charterhouse in Southwark (“we”, “us”, “our”) gathers and uses personal information. We are committed to respecting the confidentiality of the personal information you supply to us and all personal data will be processed in accordance with data privacy laws.

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.

If you do not agree with our use of your personal data as set out in this Privacy Notice, you should not submit your personal information to us.

Please check this Privacy Notice each time you consider giving your personal information to us.

### **1. CONTACTING US**

Should you have any questions or concerns about this Privacy Notice or the processing of personal data we hold about you, please contact us:

<b>By post:</b>	Charterhouse In Southwark, PO Box 59636, SE22, United Kingdom
<b>By email:</b>	<a href="mailto:info@charterhouse-in-southwark.org">info@charterhouse-in-southwark.org</a>

### **2. YOUR RIGHTS**

You have certain rights in relation to your personal data.

#### **2.1 YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION**

Under certain circumstances, by law you have the right to:

- Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).

## **2.1 CONT**

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights then please contact us using the details at section 1 of this Privacy Notice. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to discuss with you whether our use of your data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We will respond to your request within one month of receipt of your request. In some cases we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

Ordinarily, you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, in some circumstances, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances. To make a request contact us using the contact details set out in section 1 of this Privacy Notice.

## **2.2 RIGHT TO COMPLAIN**

If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information, please contact us using the contact details set out at section 1.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office: <https://ico.org.uk/global/contact-us/> or 0303 123 1113.

## **3 INFORMATION WE COLLECT**

We collect your personal information from a variety of sources. Where necessary we collect information directly from you or indirectly from third parties. The type and amount of information we collect depends on why you are providing it.

We may collect basic personal details including your name and address (and proof of name and address), email address, telephone number, any other contact details you supply, social security number and other tax details, nationality, citizenship, tax residency, date of birth and family connections. If you are a supporter, for example making a donation, volunteering, helping to fundraise, signing up for an event in addition to asking for your name and contact details (your full address, email address and your phone number) we may also ask you for other information.

If you are a company we may collect details of your company's directors, shareholders, secretaries, authorised signatories and identification documents.

To process donations or payments we collect and hold bank or credit card details which we and our contractors process securely.

### **3.1 HOW WE COLLECT INFORMATION**

We may collect information from you whenever you contact us or have any involvement with us, for example when you:

- Visit our website;
- Donate to us or fundraise for us
- Enquire about our activities;
- Request a donation from us;
- Apply for our services;
- Sign up to receive news about our activities;
- Post content onto our website/social media sites (if any);
- Volunteer for us in any capacity including becoming a trustee or committee member;
- Attend a meeting with us and provide us with information, or take part in our events; and
- Contact us in any way including online, email, phone, SMS, social media or post.

### **3.2 WHERE WE COLLECT INFORMATION FROM**

We collect information:

- From you when you give it to us directly: You may provide your details when you ask us for information or make a donation, apply to volunteer, attend an event or contact us for any other reason;
- When you give it to us indirectly: Your information may be shared with us by other people, or organisations such as fundraising sites like CAF. They should only do so in the way they have set out in their own privacy policy which you should check when you give your details;
- When you have given other organisations permission to share it: Your information may be provided to us by other organisations if you have given them your permission. This might for example be a charity working with us. The information we receive from other organisations depends on your settings or the option responses you have given them;
- When it is available on social media: Depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

## **4 CHANGES TO YOUR INFORMATION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

## **5 HOW WE USE YOUR INFORMATION**

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- Providing you with the information or services you have asked for;
- Processing applications for support from us;
- Processing donations you make, including processing for Gift Aid purposes;
- Organising volunteering activity you have told us you want to be involved in and in relation to the fundraising for us you are involved in;
- Sending you communications with your consent that may be of interest including marketing information about our services and activities, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support;

## **5 CONT**

- When necessary for carrying out your obligations under any contract between us;
- Seeking your views on the services or activities we carry on so that we can make improvements;
- Maintaining our organisational records and ensuring we know how you prefer to be contacted.

## **6 OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION**

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Where you have provided information to us for the purposes of requesting information, making a donation or requesting that we support you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by contacting us using the contact details set out at section 1. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned;
- It is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract;
- It is necessary to comply with our legal obligations;
- We may also rely on the fact that we have a legitimate interest in processing your personal data;
- The provision of information to a third party to enable them to fulfil part of a request for assistance;
- Processing necessary to protect the vital interests of a beneficiary, trustee, director, or member of staff/volunteer or other individual; and
- Processing necessary for a task carried out in the public interest.

If you want to contact us about your marketing preferences please contact us using the contact details at section 1 above.

We process your sensitive and special categories of information (this includes data concerning your health, personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or data concerning sexual orientation) where we have asked for your explicit consent or otherwise where this is necessary for the establishment, exercise or defence of legal claims.

## **CHILDREN'S INFORMATION**

We appreciate that our supporters are of all ages. Where appropriate we will ask for consent from a parent or guardian to collect information about children (under 16s).<sup>1</sup>

If you have obviously made information public (e.g. on social media) we will process sensitive/special categories of information for the purposes of carrying out our legal obligations.

If you do choose to provide your consent you can withdraw it at any time by contacting us using the details provided at section 1.

## **7 HOW WE KEEP YOUR INFORMATION SAFE**

We understand the importance of security of your personal information and take appropriate steps to safeguard it.

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<sup>1</sup>This may be reduced in the UK to age 13. Parental consent under GDPR is required re the context of information society services to children (for example Facebook) but not otherwise. Charities working with children will wish to have their own policies on consent. Under the Data Protection Act 1998, children have been able to exercise their own data rights as soon as they have capacity and understanding, which is ordinarily assumed by age 12.

## **7 CONT**

We always seek to ensure that only authorised persons have access to your information, which means only our staff, volunteers, trustees, directors and contractors, and that everyone who has access is appropriately trained to manage your information.

Unfortunately, the transmission of information via the internet is not completely secure. So while we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

Who has access to your information?

- Our trustees, directors and volunteers as necessary for the work they carry out;
- Third parties who provide services for us, for example collecting or processing data, sending mailings and processing payments or donations. We select our third party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.

It is possible that the information you provide to us will be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. We would meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We would do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a data processing agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

## **8 HOW LONG WE KEEP YOUR INFORMATION FOR**

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold records of donations you make, including gift aid declarations, for at least six years so we can fulfil our statutory obligations for tax purposes. We will provide information about our record retention procedures on request.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. We may periodically ask you to renew your consent.

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## **9 LINKS TO OTHER WEBSITES**

Links on our website may take you to third party sites over which we have no control. While such links are provided for your convenience, you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. We are not responsible for any linked websites.

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<sup>2</sup>The Fundraiser Regulator states that the period should be assessed having regard to how long the individual would consider it reasonable to be contacted before they are asked to renew consent. (See Fundraiser Regulator's Personal Information and Fundraising: Consent, Purpose and Transparency 21 February 2017 [www.fundraisingregulator.org.uk](http://www.fundraisingregulator.org.uk)).

## **10 CHANGES TO OUR PRIVACY NOTICE**

We reserve the right, at our discretion, to change, modify, add to, or remove portions from, our Privacy Notice. We will of course notify you of any changes where we are required to do so. Any such notifications may be made by way of our website.

This Privacy Notice was last updated in [October 2018].