

Friends of In Touch Policy
Registered Charity: 1153013



Policy No: FOIT 08

TITLE: Privacy Policy

ISSUE No: 2

ISSUE DATE: November 2020

PREPARED BY: Policy Committee

1 Policy Statement

1.1 This policy is intended to inform you how and why *Friends of In Touch* uses personal information from clients and other members of the public. When we refer to 'we' or 'us' in this policy we are referring to *Friends of In Touch*.

1.2 We will abide by the General Data Protection Regulations (GDPR) dated May 2018.

2 Information we collect and hold about you

2.1 Clients

- 2.1.1 We will collect personal information about you when you contact us about providing any of our services to you (for example, your name, address, email contact details, telephone number). We may require further information before we provide advice to you in order to comply with our requirements.
- 2.1.2 During the course of providing services to you, we may collect information about you and/or any other individuals you tell us about. Depending on the nature of the work we carry out for you, we may collect and use special categories of personal data about you or a third party you tell us about (for example, information about health, ethnic origin, religious or philosophical beliefs).
- 2.1.3 When you become a client of *Friends of In Touch*, or when you enter into discussions to become a client, we may add your personal data to our marketing database in order to send you information about our activities. We will always give you the opportunity to opt-out of this marketing.

2.2 Marketing

- 2.2.1 If you are not a member of *Friends of In Touch*, we will only send information about our services by email or other electronic means with your consent. If you consent to receive email marketing from us, we will add your personal information (your name and email contact details) to our marketing database.
- 2.2.2 You can contact us at any time at info@friendsofintouch.org.uk to opt out, change your contact details or to update your communication preferences.
- 2.2.3 We may also send information by post if we are satisfied that we have a legitimate reason to do so, for example, a survey for members to help improve our services.

APPROVED BY:

POSITION:

Chair

Review date November 2022

DATE: November 2020

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2.3 Visitors to our website

- 2.3.1 We will collect personal information that you voluntarily provide to us if you fill in a form on our website or apply for a vacancy through the website. This information may include your contact details including name, address, email, telephone number and, where you provide it, some categories of personal data, for example, ethnic origin and religious beliefs.
- 2.3.2 We may also collect information about how you use our website and our web provider's Cookies Policy has information about how they use cookies on our website.

2.4 People who contact us via social media

- 2.4.1 If you send us a private or direct message via social media, we aim to deal with your enquiry in-house. We will not share messages with any other organisations without your prior consent.

2.5 Queries and complaints

- 2.5.1 If you send a query or complaint to us, we will use the personal information you provide to us (for example, your name and the name[s] of any other individuals involved, plus your contact details) in order to process your query or complaint and respond to you.

3 How we use your information

- 3.1 We only ever uses your personal data if we are satisfied that it is lawful and fair to do so:
- because you have given your consent to us using your information for the specific purposes described in this privacy notice.
 - because it is necessary to enter into, or perform, a service with you.
 - in order to comply with a legal obligation.
 - for our own (or a third party's) legitimate interests provided your rights don't override these interests. We may use your anonymised data to identify usage trends and for data analytics as this information will help us review and improve our services and under reasonable expectation to provide you with information you would expect to receive or that would benefit and enhance our relationship.
- 3.2 We will only use special categories of personal data relating to you or to third parties you tell us about when we have your explicit consent and/or where it is necessary to use the information for the establishment, exercise or defence of legal claims.
- 3.3 We will never sell your personal data or share it with third parties who might use it for their own purposes apart from the exceptions in 4.1.

4 Sharing your information

- 4.1 We will not disclose any information you provide to any third parties other than:
- where you have given us consent to share the information.
 - where we instruct professional advisors on your behalf e.g. Children's Services.

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- to other third parties where necessary to carry out your written instructions, where information such as an email address is passed to our third party service providers, who provide operational and technical support in order to make the delivery of our services more efficient. A list of our third-party service providers can be provided to you upon request. Operational and technical support is provided through information and technology systems such as email systems and the monitoring of our website and other technical systems.
 - in order to enforce any terms and conditions or agreements between us.
 - to protect our rights, property and safety, or the rights, property and safety of others, e.g. Safeguarding concerns. For example:
 - where a child or adult is felt to be at risk or harm either inside or outside of *Friends of In Touch*. Staff and volunteers will follow our Safeguarding policy (Ref: FOIT 01).
 - where anyone using *Friends of In Touch* or a volunteer is at risk of physical violence and/or abuse. An incident report will be completed and sent to the referrer (Ref: F002).
- 4.2 We may share results of research that we carry out into the use of our services with third parties but this information will always be anonymised and will not contain your personal information.

5 Data security

- 5.1 We have appropriate security measures in place to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.
- 5.2 We hold data electronically in our secure laptops and on a secured *Dropbox* file server. Our laptops are protected using firewalls and anti-virus/malware software.
- 5.3 Our *Dropbox* file can only be accessed by current trustees, Project Coordinator and Administrator. Access is controlled by the Chair of trustees.
- 5.4 We store personal data and other archived papers in lockable filing cabinets at Y-Zone Youth Centre. Only approved personnel holding appropriate keys can access those filing cabinets.
- 5.5 When necessary, we dispose of or delete your data securely.
- 5.6 We ensure that our contracted employees and volunteers are aware of their privacy and data security obligations and we take reasonable steps to ensure that employees of third parties working on our behalf are aware of their privacy and data security obligations.
- 5.7 We limit access to your personal information to trustees and those contracted employees and volunteers who have a need to know.
- 5.8 The transmission of information via the internet is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your electronic information transmitted to us and any transmission is at your own risk.
- 5.9 We will notify you and any applicable regulator of any suspected data security breach where we are legally required to do so.

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6 Transferring your information overseas

- 6.1 We will not transfer the information you give us to any other country without receiving your written consent to do so.

7 Data retention

- 7.1 We will hold the information for as long as required by law or our regulatory obligations. All information relating to families and volunteers, which has not been used for three years, will be treated as confidential waste and disposed of as such, unless a related incident has been recorded, in which case it will be kept until the individual is 21 or until they have left *Friends of In Touch* (whichever is later). The disposal of any confidential waste will be undertaken by the Project Administrator with the prior approval of the Chair of *Friends of In Touch*.
- 7.2 Please note that personal data held on our client files may be retained for longer periods as it may be necessary to retain this data in order to allow our clients or third parties to protect their legal rights. See our Safeguarding policy, Appendix 3, section 7.
- 7.3 These retention periods may be extended or reduced if we deem it necessary.
- 7.4 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required. The Project Coordinator is responsible for these reviews.

8 Your rights

- 8.1 Under certain circumstances, you have the right to:
- 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 lawfully processing it.
 - ask us to correct any information that we hold about you which is incorrect, incomplete, or inaccurate.
 - ask us to erase your personal information from our files and systems where, in the opinions of the trustees, there is no good reason for us continuing to hold it.
 - object to us using your personal information to further our legitimate interests (or those of a third party) or where we are using your personal information for direct marketing purposes
 - ask us to restrict or suspend the use of your personal information, for example, if you want us to establish its accuracy or our reasons for using it.
 - ask us to transfer your personal information to another person or organisation.

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- 8.2 If you have given your consent to us processing your personal information (for example, consent to receive information about our events), you have the right to withdraw your consent at any time. To withdraw your consent, please contact info@friendsofintouch.org.uk. Once we have received notification that you have withdrawn your consent, we will, as soon as possible, no longer process your personal information and, subject to our retention policy, we will dispose of your data securely.

9 Queries and complaints

- 9.1 Our Project Coordinator oversees compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact info@friendsofintouch.org.uk.

10 Review of this policy

- 10.1 This will take place every 2 years. Additional changes are to take account of new legislation and practice guidance.