



March 2021

## Our Privacy Policy

Our policy describes how and why Horsham Matters (Registered Charity Number: 1116253) uses your personal information, how we protect your privacy when doing so, and your rights and choices regarding this information. We promise to respect any of your personal information which is under our control and to keep it safe.

We aim to be clear when we collect your information about what we will do with it. Our use of personal information allows us to provide services and meet the aims of our Charity in supporting the residents of Horsham.

### 1. What personal information do we collect?

We collect, store and use the following kinds of personal information:

- Your name;
- Your contact details (including postal address, telephone number, email address and/or social media identity);
- Your date of birth;
- Your gender;
- Your child's personal information if we are providing support to them;
- Your bank or credit card details where you provide these to make a payment;

If you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include things like employment status, previous experience depending on the context, as well as any unspent criminal convictions or pending court cases you may have);

- Information about your activities on our website and about the device you use to access these, for instance your IP address and geographical location;
- Information about events, activities and products, which we consider to be of interest to you;

- Where you have left us a legacy, any information regarding next of kin that you may have provided us to administer this;
- Information as to whether you are a taxpayer to enable us to claim Gift Aid;
- Age, nationality and ethnicity information for monitoring purposes; and
- Any other personal information you provide to us.

Certain types of personal information are in a special category under data protection laws as they are considered to be more sensitive. We only collect this type of information about our supporters to the extent that there is a clear reason for us to do so, for example asking for health information if you are volunteering with us to ensure that we provide appropriate facilities or support.

Wherever it is practical for us to do so, we will make collecting this type of information clear and what it will be used for.

We have installed CCTV systems at our Micah House building and our Charity Shop for the purposes of monitoring building security and crime prevention and detection. Signs are displayed notifying you that CCTV is in operation. Images will not be kept longer than necessary. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

You have the right to see CCTV images of yourself and be provided with a copy of the images. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing.

## **2. How do we use your personal information?**

We will use your personal information to:

- Provide you with the services , products or information you asked for;
- Administer your donation or support your fundraising, including processing Gift Aid;
- Keep a record of your relationship with us;
- Respond to or fulfil any requests, complaints or queries you make to us;
- Understand how we can improve our services, products or information by conducting analysis and market research;
- Further our charitable objectives;
- Send you correspondence and communicate with you;
- Process applications for funding and for administration of our role in the projects we fund;
- Administer our website and to troubleshoot, perform data analysis, research, generate statistics and survey related to our technical systems;
- Testing our technical systems to make sure they are working as expected;

- Contact you if you enter your details onto one of our online forms, and you don't send or submit the form, to see if we can help with any problems you may be experiencing with the form or our website;
- Display content in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or computer);
- Generate reports on our work, services and events;
- Safeguard our staff and volunteers;
- Conduct due diligence and ethical screening;
- Monitor website use to identify visitor location, guard against disruptive use, monitor website traffic and/or personalise information which is presented to you;
- Process your application for a job or volunteering position;
- Conduct training and quality control;
- Audit and administer our accounts;
- Meet our legal obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies;
- Carry out fraud prevention and money laundering checks;
- Undertake credit risk reduction activities; and/or
- Establish, defend or enforce legal claims

### **3. How do we use information to tell you about our work?**

#### Sending marketing communications

Our marketing communications include information about the support we are offering across Horsham and any future developments. We will only send marketing communications to those that have explicitly stated that they are happy for us to do so, with the exceptions stated below.

#### Managing your contact preferences

We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing.

You can at any time change your preferences, please contact us on 0300 1240204 or by email: [info@horsham-matters.org.uk](mailto:info@horsham-matters.org.uk)

If you have decided you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing a donation you've made and any related Gift Aid, thanking you for a donation or participation in an event, or keeping in touch with you about volunteering activities you are doing for us.

## Building profiles of supporters

Our work is only made possible through generosity of our supporters. It is therefore crucial that we have the best possible understanding of our supporters, targeting our communication effectively to avoid intrusive communication.

Which information do we use?

We use existing data from Horsham Matters' own database and combine this with information from publicly available sources such as charity websites and 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 of our charity. We only use reputable sources where someone would expect their information may be read by the public. We avoid any data we believe has not been lawfully or ethically obtained, and we do not use information sources which have not been broadcast or made public.

Should you wish at any time to opt out of these communications, please contact us on 0300 1240204 or by email: [info@horsham-matters.org.uk](mailto:info@horsham-matters.org.uk)

## **4. Lawful basis for processing personal data**

The General Data Protection Regulation (EU Regulation 2016/279) and in current UK data protection specifies that the use of personal information must meet a lawful basis for processing.

### Specific Consent

We process personal information lawfully as:

- We ask people to positively opt in
- We don't use pre-ticked boxes or any other type of default consent
- We use clear, plain language that is easy to understand
- We specify why we want the data and what we are going to do with it
- We inform you that you can withdraw at any time and how to do this

### Contract

We process personal information lawfully as we have:

- A contract with the individual and we need to process their personal data to comply with our obligations. For example, if we are requested to deliver or collect items we will need to process addresses to fulfil our contract or you are applying to us as a volunteer

## Legal Obligation

We process personal information lawfully as:

- We are obliged to do so to comply with a common law or statutory obligation
- We have specified the legal provision or the source of advice and guidance that clearly states our obligations

## Vital Interests

We process personal information lawfully where:

- It is necessary for us to protect life or health, for example a safeguarding issue or the need to share information with an emergency service

## Legitimate Interests

We process information lawfully as we have:

- A legitimate interest to do so, for example, to maintain internal records of the people we work with, including supporters and volunteers

When we process sensitive personal information we will seek to do so under explicit consent, rather than a legitimate interest.

## **5. Keeping your information safe**

We ensure that measures are in place to protect your personal information, both physically and electronically. We have implemented systems to prevent improper access such as password protected documents, encrypted portable devices, secure storage of physical documents etc.

We are unable to guarantee security of data across the internet as transmissions are not completely secure, nor can we guarantee the security of third party organisations linked to our website.

Any payments for goods and services, for example, through our Charity are processed securely through Verifone and World Pay.

## **6. How long will we keep your information?**

We will only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid)

## **7. Sharing your information**

As stated above, we will never sell or rent your information to third parties for marketing purposes. We may disclose your information to a third party when necessary to do so under one of the lawful reasons for doing so e.g. contract

## **8. Your rights**

Under Data Protection law, you have the following rights:

- Right to access your personal information, please contact us should you wish to do so at any time: [info@horsham-matters.org.uk](mailto:info@horsham-matters.org.uk)
- Right to have your inaccurate personal information corrected
- Right to restrict the use of your personal information
- Right to erasure of your personal information, this is subject to exceptions
- Right for your personal information to be portable
- Right to object to the use of your personal information
- Right to erasure of your personal information

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.

Right for your personal information to be portable

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

Right to object to the use of your personal information

If we are processing your personal information based on our legitimate interests or for statistics, you have a right to object to our use of your information.

If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

If you wish to exercise any of the above rights, please contact us: [info@horsham-matters.org.uk](mailto:info@horsham-matters.org.uk) or by post to Horsham Matters, Micah House, Blatchford Road, Horsham, W Sussex, RH13 5QR. Please provide details of your request, we aim to respond to enquiries within one month.

**The above information relating to your rights is a summary, further information and guidance is available through the Information Commissioner's office (ICO)**