

Privacy Statement

Table of Contents

Data Protection Principles	2
Why FCA collects Information from you	2
Sensitive Information	4
Sharing your Information	4
Storing and Deleting Your Information	5
Your Rights	5
Website Cookies	6
How we use your Information	7
Changes to this Statement	8
FCA Data Protection Officer	8

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By: RAB

Next review date: June 2022

1. Data Protection Principles

1.1 Freedom Community Alliance (FCA) is committed to protecting all personal information we obtain about you, whether you are a service user, supporter, volunteer or staff member. We will only collect and use your personal information for carefully considered and legitimate purposes in line with the aims of our charitable work and, in certain circumstances, where we are legally obliged to do so, in order to run and support our programmes.

1.2 We will never share your information with any other organisation for their own marketing purposes, and we will never sell your information to any third party

1.3 This notice sets out what information we collect about you, how we will use it and why, and what your rights are.

1.4 For the intention of the General Data Protection Regulation (GDPR), the data controller is FCA (Registered Charity no. 1125960 and Company no. 00628989). Any queries regarding this policy should be directed to our Operations Manager as per the details provided at the end of this document.

2. Why we collect information from you

2.1 When we use your personal information, we will always consider if it is legally permitted, fair and balanced to do so and whether it would be within your reasonable expectations that we would use your data as detailed below:

2.2 Service Users

We may gather your personal information when you subscribe or apply for access to any of the services we provide, for example, Freedom Housing, our Day Centre services or our Treatment and Recovery programme. In all cases, this is to determine your suitability to access our services; to ensure we provide a safe environment for all service users and staff and to help us to meet your needs as best we can.

2.3 Supporters

Without our supporters and donors, we would not be able to provide all of the services that we currently do free of charge to the most vulnerable people within our communities in North Devon. Each and every supporter is a blessing to our work and the people we work with, we value each and every contribution made by them.

It is important to us to ensure it is easy and rewarding for members of the public to support our work at FCA and to make sure we are respectful of the ways in which people choose to support our work. We would never wish for our supporters to feel that we take them for granted. We will, therefore, strive to ensure that our supporters never feel used, over-stretched or unappreciated.

On occasions, you may provide personal information when communicating with us by mail, email, phone or facsimile or when completing forms or giving donations be it through website appeals or in other ways. This includes, but is not limited to, information you provide when you complete registration forms to use our website; subscribe to our newsletters; make regular donations to our appeals or appeals from other fundraisers on our website; set up regular donations; give one-off donations and when you report a problem with our website. It also includes information provided when filling out order forms, completing purchases from our on-line shop and details included in legacy and in memorandum documentation. Information provided might include, but is not limited to, your name, age, address, email address, phone numbers, financial and credit card details all of which can be used to thank you for your support and process a Gift Aid claim, where appropriate.

With your specific written consent, we will keep you in touch with our work, primarily through a periodic newsletter. We may also use your information to ask for additional support. You have the right to opt out of any of these communications at any time. Our lawful basis for processing this information is your consent gained in support of the legitimate interests of FCA in raising funds to support the ongoing work of the charity.

We will only send you information by email or letter for fund-raising purposes if we have your consent. We do not contact supporters by text for fund-raising purposes, and would not do so without your consent.

2.4 Website Users

We may automatically collect from you in regard to your visits to our website the following information:

1. **Technical information:** including, but not limited to, Internet Protocol address ('IP' address) which is used to connect your device to the internet, your login information, browser type and version, time zone settings, browser plug-in types and version, operating system and platform;
2. **Information about your visit:** including, but not limited to, the full Uniform Resource Locators ('URL') used to navigate to and from our website, pages, products and resources viewed or searched for, our page response times, download errors, length of time spent on pages visited, interaction information (e.g.: scrolling, clicks, swipes and mouse-overs), the methods used to browse away from a page, and any phone number used to contact us.
3. **Information received from other sources:** We sometimes receive information about you if you use any of our subsites, social media accounts, or other services we provide. We work closely with third-party organisations (e.g.: business partners, sub-contractors, payment and delivery services, advertising networks, analytical providers, search information providers and others) and these sources may provide us with information about you.

2.5 Job / Volunteer Applicants

We may gather your personal information when you apply for a job or volunteer position with us to process your application and to monitor our recruitment processes and statistics.

Your information will only be shared with those staff involved in processing your application. We will only request a reference or a DBS disclosure with your prior consent. Your information will not be added to our mailing list without your explicit consent, and will not be used for any subsequent purposes other than ensuring fair recruitment.

2.6 Staff / Volunteers

FCA employ staff, volunteers and consultants to run our programmes and provide necessary administrative and professional support. We process the personal information of our employees for recruitment, contractual purposes, staff administration, remuneration, pensions and performance management purposes.

2.7 CCTV

We use CCTV cameras within specific areas of the Freedom Centre site for the purpose of protecting the safety of our clients, staff, visitors and property. We use these images to help prevent or detect incidents of crime and disorder and for the investigation of incidents of concern. Images may be passed to the police for the prosecution of any offenders or used to ensure internal sanctions of clients are appropriately applied. We believe the legitimate interests of FCA are served by the use of cameras to protect the health, safety and property of our visitors, staff, service users and site.

3. Sensitive Information

3.1 Under data protection law, certain categories of personal information are recognised as sensitive, including health information, race, religious beliefs, and sexual orientation ('sensitive personal data').

3.2 We only collect sensitive personal data if there is a clear reason for doing so. (For example, if you are a prospective resident, we will need information about your health in order to ensure that we can provide you with suitable treatment). There are also other categories of sensitive data that we are required to collect for the purposes of anonymous government monitoring. We also need to ask questions about religious belief for those prospective staff and volunteers who will have regular contact with our residents, in line with the Christian ethos of FCA.

3.3 We also need to collect information on previous convictions from potential residents, staff and volunteers of FCA in order to safeguard the residents/clients using our services and provide the most appropriate care for them. The utmost care is taken to ensure that such data is processed securely and discreetly in accordance with UK Data Protection law.

4. Sharing Your Information

4.1 We will never sell your information to any third party. Neither will we share your information with another organisation, other than where strictly necessary for your own benefit or the operation of our services, for example:

- If necessary for law enforcement or similar purposes
- As a necessary part of providing you with the services that meet your needs
- To process the pay-roll, pensions and tax of our staff
- In order to contact you as a supporter – for example, by using a mailing house or email broadcaster to process our communications. (In this case, we will make sure we have a written contractual agreement in place that will ensure that those organisations can only use the data provided for the specific purposes we direct them to do, and that they have in place strict security requirements in order to protect your personal information.)

4.2 We may occasionally collect publicly-available information about our supporters from, for example, Companies House, social media etc. You may wish to check the privacy policy of these sites to find out more information on how they will process your data.

4.3 We may from time to time, share your information with selected third party partners, including:

- Business partners, sub-contractors and suppliers for the conduct of the contracts that we enter into with them or you or for the fulfilment of any donation given by you;
- Advertisers and advertiser networks which require the information to select and send appropriate advertising about FCA to you and others. We may use such combined data to aid advertisers in their analysis of our advertising and to reach our target audiences. We may make use of personal information we have collected to enable us to display our advertising to these target audiences; and
- Analytical information and search engine providers that support us to improve and optimise our website.

4.4 We may also share your information with third parties:

- If we are subject to a duty to disclose or share your personal information in order to adhere to legal obligations, or in order to apply our Terms and Conditions and other agreements; or

to protect the property, safety or rights of FCA, our clients, or others such as the police, regulatory bodies; and,

- In some cases, we may be obligated to disclose information or undertake more detailed monitoring under the Regulation of Investigatory Powers Act 2000 or Freedom of Information Act 2000 as amended.

4.5 We will never sell or share your personal data with third parties for marketing purposes or for purposes other than as described in this Privacy and Cookies Policy.

5. Storing and Deleting your Information

5.1 The information that we collect from you is processed by staff who may be engaged in, among other things, the processing of your payment details. By submitting your personal data, you agree to the transfer, storing and processing of your information. FCA takes all reasonably necessary steps to ensure that your data is treated securely and in accordance with the General Data Protection Regulation (GDPR) (EU) and this Privacy and Cookies Policy.

5.2 All data provided to us by you is stored on secure servers. Any payment transactions are encrypted. Where password access enables you to admittance certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

5.3 Unfortunately, the transfer of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site; any transaction is at your own risk. Once we have received your data, we use strict procedures and appropriate security controls with the intent of preventing unauthorised access.

5.4 Any credit card details we receive through our website are passed securely to our partners who are compliant with Payment Card Industry Security Standards to fulfil and process donations.

5.5 We will take all reasonable steps to ensure that the information we hold about you is kept secure and can only be read by the appropriate staff members. In line with our GDPR Policy FCA will only hold your personal data for as long as it is necessary for our legitimate purpose (which will vary depending upon your relationship with us) or as required in line with the law.

5.6 You can contact the FCA Data Protection Officer (DPO) using the details below if you need further details about our GDPR Policy, to ask how long your personal data will be held for or to request that your data be deleted.

6. Your Rights

6.1 **Right to be Informed:** You have the right to be told how your personal information will be used. This privacy notice, and other summaries used elsewhere, are intended to be a clear and transparent description of how your data may be used. Please contact us if you have any questions.

6.2 **Right of Access:** You have a right to ask us to confirm whether we are processing information about you, and to request access to this information. It will help us to process your request if you can be specific about what information you require, otherwise we may need to contact you again to clarify this. We will respond to your request within 30 days, once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

6.3 **Right of erasure:** Except where we need to retain your data for legal reasons, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). Please contact the FCA DPO if this is your wish.

6.4 Right of rectification: You have the right to request that we update or correct any information we hold about you. Please contact us to let us know what needs correcting.

6.5 Right to restrict processing: In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

6.6 Right to data portability: Where we are processing your personal data under your consent, the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to another so, if a service user (resident) asks us to forward their details to another service, we will always try to help.

6.7 Right to object: You have the right to stop the processing of your personal data for direct marketing purposes. We will not pass your details to any third party for marketing purposes, however, if you feel this applies to you, please contact us.

6.8 Right to object to automated decisions: In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions that have a legal effect on you, you have the right to object. This does not apply to anything that FCA does.

6.9 Right to make a complaint to a supervisory body: If you are unhappy with any aspect of our protection of your data, you are entitled to make a complaint through the Information Commissioner's Office (ICO) on the following website address: www.ico.org.uk/make-a-complaint/

Indeed, if you wish to make a complaint about any aspect of the work to FCA, you can also contact the Charities Commission: www.gov.uk/complain-about-charity

7. Website Cookies

7.1 Our website uses cookies to discern you from other website users. This aids us in delivering a good website experience when you browse our content and enables us to improve our website.

7.2 By using our website and agreeing to our Terms and Conditions and Privacy and Cookies Policy you agree to our use of cookies in compliance with the terms set out in this policy.

7.3 A cookie is a small file containing an alphanumeric identifier that is sent by a web server to a web browser and is stored by the browser. The alphanumeric identifier is then sent back to the server each time the browser requests a new page from the server.

7.4 Cookies can be either a 'persistent cookie' – stored by a web browser and remaining valid until its set expiry date (unless deleted by the user before the expiry date), or a 'session cookie' which expires at the end of the user session when the browser is closed.

7.5 Typically, cookies do not contain any information that identifies a person, however, personal information stored about you by us may be linked to the information stored in and obtained from cookies.

7.6 Cookies can and are used by web servers to identify and track users as they browse different pages on a website and to identify returning website users.

7.7 We use both persistent and session cookies on our website.

7.8 The cookies we use recognise a device when a user visits our website, to track users as they navigate our website, to enable to use of a shopping cart on our website, to improve the usability of our website, to administer our website, to prevent fraud and improve our website security, to validate authenticated users sessions, and to facilitate the use of our website's search engine.

7.9 We use Google Analytics to analyse our website's use.

7.10 Our analytics service provider generates statistical and additional information about use of our website through the use of cookies.

7.11 The information generated relating to our website is used to build reports about the use of our website.

7.12 Our analytical service provider's privacy policy can be found at <https://www.google.com/policies/privacy/>

7.13 Analytics cookies used by our website include, but are not limited to, analytics.js a single, first-party cookie named `_ga` to store the Client ID, but the cookie's name, domain, and expiration time may all be customized. Other cookies created by analytics.js include `_gid`, `AMP_TOKEN` and `_gac_<property-id>`. These cookies store other randomly generated ids and campaign information about our website users.

7.14 Our website uses third-party cookies. Details of these third party cookies are detailed below:

7.15 Most browsers allow you to refuse to accept cookies; however, blocking all cookies will have a negative impact on the usability of our website and many other websites.

7.16 If you block cookies, you may not be able to use the features and functions on our website.

7.17 It is possible to delete the cookies stored on your computer. Deleting cookies can have a negative impact on the usability of our website and many other websites. 7.1 Our website may use 'cookies' to track your visit and enable certain functions within the site, however, we do not retain or use any personal data from the website. Please note, if you click on a link to another website (which may also operate 'cookies'), you should read that privacy policy.

8. How we use your information

The information we hold about you is used in the following ways:

8.1 **Information you give to us** is used to complete our obligations in connection with any contracts, charitable services, charitable giving elected to enter into by you between you and us, and to supply you with the data, services and products that you request. This includes, but is not limited to:

8.2 Processing donations - to the relevant project within our charity and providing refunds as per our refunds policy.

8.3 For fundraising purposes - To deliver information about products or services we offer that are similar to those you have made queries about or purchased in the past, or to deliver information about FCA and our appeals and campaigns

8.4 For administrative purposes -

- For internal record keeping, to manage feedback, and to respond and process complaints;
- To deliver information about FCA and the ways in which you can support our work. This can include, but is not limited to, postal and email correspondence, messages delivered through social media such as our Facebook and Twitter accounts, or through online advertising. If you do not wish for us to use your information in this way please contact us to advise of your preferences on: 01271 321171, by email at: info@freedomsocialprojects.org.uk or by mail at: 1 Howard Avenue, Barnstaple, EX32 8QA;
- To advise you of changes to our services; and

- To enable us to ensure our website's content is delivered in the most effective and efficient way for you and your device.

8.5 **Information we collect about you** is used in the following ways:

8.6 To enable us to deliver our services safely and effectively

- We will assess information about you, if you are a client, to determine your suitability to access our services; to ensure we provide a safe environment for all service users and staff and to help us to meet your needs as best we can.

8.7 To administer our website

- For internal processes including but not limited to, troubleshooting, data analysis, donor profiling and matching, testing, research, page and message optimization, statistical and survey purposes;
- To improve our site and ensure our content is delivered in the most effective and efficient way for you and your device;
- To aid your participation in the interactive features of our website, services, appeals and campaigns when you choose to do so;
- To help us keep our website secure and safe;
- To measure and analyse the effectiveness of the advertising delivered to you and others, and to deliver relevant advertising to you; and,
- To suggest and recommend products and services for you and other website users that we believe may be of interest to you or them.

9. Changes to This Statement

From time to time, we will make changes to this statement to keep it up to date and in line with current legislation. Please make sure you check regularly to see what's changed. This document was last updated in June 2021 and will be reviewed no less frequently than every 2 years.

10. Details of the FCA Data Protection Officer

Roger Bartlett
Operations Manager
Freedom Community Alliance,
The Freedom Centre,
1 Howard Avenue,
Barnstaple,
Devon, EX32 8QA

Phone: 01271 321171 ext 204

Email: info@freedomcommunityalliance.org.uk