## Embrace CVoC Privacy Policy

Embrace CVOC is committed to protecting your personal data and this privacy policy states how we collect data, how we store it and how we use it.

This privacy policy applies to the websites, products and services offered by Embrace CVoC The purpose of this policy is to give you a clear explanation about how Embrace CVoC collects and uses the personal information you provide to us and that we collect. We ensure that we use your information in accordance with all applicable laws concerning the protection of your personal information.

## How do we collect information?

We obtain personal information from you when you enquire about our activities, register with us, send or receive an email, make a donation to us, ask a question about our services or otherwise provide us with your personal information. Sometimes we may obtain your personal information from third party data suppliers only if they provide the appropriate evidence that you have agreed for your personal information to be shared with other organisations.

Occasionally we obtain publically available information such as contact information or we research information to help us perform due diligence checks to ensure we are not being abused by fraudsters or criminals posing as genuine donors or to ensure that there are no conflicts of interest from potential supporters or organisations prior to our engagement.

## What information do we collect?

The personal information we collect might include name address email address, telephone numbers date of birth bank account details (for setting up regular direct debit or payment information) and your family relationships (for when submitting a family break requests). Data Protection law recognises that certain categories of personal information are more sensitive. These are known as special categories of data and cover health information race, religious beliefs and political opinions. We will only collect special categories of data about our supporters if there is a clear reason for doing so such as participation in a run or walk or similar fundraising event or where we need to ensure we provide the appropriate facilities or support to enable you to participate in an event.

## How do we use your information?

We may use your personal information for:

- Dealing with your enquiries requests and complaints
- Processing your donations and orders made online or through our fundraising events
- Providing you with information about our work activities events and services
- Complying with our legal obligations policies and procedures
- Providing and personalising our services
- Administering membership records
- Fundraising
- Conducting market research


## How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal or transactional data stored on our website and systems.

## Marketing

Being able to communicate with you is important, as your support will help transform the lives of the most disadvantaged children. And we believe in being open, honest and transparent with our supporters and want you to feel comfortable about your decision to give us your personal information and how we use it.

We will use the details you provide to us to communicate with you about how we are supporting some of the most vulnerable children across the UK through the work of our services. We would also like to tell you how your support is helping and other ways you can help in the future whether that's through volunteering, events or fundraising.

We promise that will only communicate with you in the way you wish us to and we will always respect your privacy. You can change your mind at any time and its quick and easy to let us know that you no longer want to hear from us by contacting us at
info@embracecvoc.org.uk. We will always respond to your wishes in a sensitive, timely, courteous and professional way.

Please be assured that we will take appropriate measures to keep your personal information safe and secure and we promise not to over contact. We will never pass your
personal information on to other organisations for them to use for their own marketing purposes

In certain instances, we collect and use your personal information by relying on the legitimate interest legal basis. This is because when you, for example, request to receive services or products from us, we have a legitimate organisational interest to use your personal information to respond to you and there is no overriding prejudice to you by using your personal information for this purpose. However we will always provide you with the option to opt-out of hearing from us. In most instances, however, we will rely on obtaining your consent to our use of your personal information. This is the case, for example, where we seek to obtain your consent to receive email marketing from Embrace CVoC

We will only communicate to you in the way you have told us. For example:

## Email/text marketing

If you actively provide your consent to us along with your email address and/or mobile phone number we may contact you for marketing purposes by email or text message. By subscribing to Embrace CVoC emails or opting in to email communication from Embrace CVoC you grant us the right to use the email for email marketing.

## Post/telephone marketing

If you have provided us with your postal address or telephone number we may send you direct mail or telephone you about our work unless you have told us that you would prefer not to receive such information or we receive a notification from the Fundraising Preference Service that you have requested marketing communications to stop. We also actively check telephone numbers against the Telephone Preference Service (TPS) and will only make telephone calls to you where your telephone number is listed on the TPS if you have specifically told us that you do not object to such calls and have consented to receive them from Embrace CVoC

## It's your decision

It is always your decision as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you do not want us to use your personal information in these ways please indicate your preferences on the form on which we collect your data.

You may opt-out of our marketing communications at any time by responding to our email requesting to opt out of marketing emails. You can also change any of your contact preferences at any time including telling us that you don't want us to contact you for marketing purposes by emailing info@embracecvoc.org.uk We will not use your personal information for marketing purposes if you have indicated that you do not wish to be
contacted by us for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

## Disclosures

We will never pass your personal information on to other organisations for them to use for their own marketing purposes.

However we may disclose your personal information in the following circumstances:

- To third parties who provide a service to us and are data processors. This would include our trusted partners that work with us in connection with our charitable purposes to provide counseling or other support. We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all our data processors and regularly monitor their activities to ensure they are complying with Embrace policies and procedures.
- Where we are under duty to disclose your personal information in order to comply with law or the disclosure is 'necessary' for purposes of national security taxation and criminal investigation or we have your written consent.
- Where we need to perform due diligence checks to ensure we are not being abused by fraudsters or criminals posing as genuine donors for example money laundering proceeds of crime tax avoidance.


## Consent from parents/guardians if you're under 13

We are committed to protecting the privacy of the young people that engage with us through our website and at fundraising events.

Our fundraising events also request specific information about the age of participants Anyone under the age of 16 must obtain parental or guardian consent before participating in an event organised by Embrace CVoC. Children aged under 13 must obtain the consent of a parent or guardian before providing any personal information.

## Keeping your personal information

We keep your personal information for as long as required to operate the service in accordance with legal requirements and tax and accounting rules. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

## Your rights

Under the Data Protection Act 1998 and the General Data Protection Regulation, which comes into force on May 25th 2018 you have the following rights:

1. The right to access your personal information
2. The right to edit and update your personal information
3. The right to request to have your personal information deleted
4. The right to restrict processing of your personal information
5. The right to object
6. The right to lodge a complaint with a supervisory authority

## 1. The right to access your personal information

You have a right to obtain confirmation that your personal information is being processed. You also have the right to request a copy of your personal information we hold.

We will provide a copy of your personal information within 40 days of receiving the written request.

Should you wish to exercise these rights we require you to prove your identity with two pieces of approved identification. Please address requests to info@embracecvoc.org.uk

If you wish to make a request to see your data you can email us at info@embracecvoc.org.uk. We will contact you and let you know what information we require to provide the information. please ensure you provided us with all the requested information in an alternative for us to check your identity.

## 2. The right to edit and update your personal information

The accuracy of your personal information is important to us. You can edit your personal information including your address and contact details at any time. Please address requests to: info@embracecvoc.org.uk or call 03456099960

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 28 days before they take effect.

3 The right to request to have your personal information deleted

You have the right to request the deletion of your personal information which we will review on a case by case basis

Should you wish to exercise these rights please address requests to:
info@embracecvoc.org.uk

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 28 days before they take effect

## 4. The right to restrict processing of your personal information

You have the right to 'block' or suppress processing of your personal data. However, we will continue to store your data but not further process it. We do this by retaining just enough of your personal information so we can ensure that the restriction is respected in the future.

Should you wish to exercise these rights please email requests
to: info@embracecvoc.org.uk

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 28 days before they take effect

## 5. The right to object

You have the right to object to your personal information being processed to marketing and for research and report purposes. From the very first communication from us and every marketing communication we send after you will have the right to object to marketing.

Alternatively, you can exercise this right by email info@embracecvoc.org.uk

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 28 days before they take effect

If we process your personal information for the exercise or defence of legal claims or we can demonstrate compelling grounds that override your rights and freedoms we may not be able to fulfil your request.
6. Your right to lodge a complaint with a supervisory authority

If you wish to lodge a complaint or seek advice from a supervisory authority please contact:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: +44 (0) 01625545745

Website: www.ico.org.uk

## Internet-based transfers

Given that the Internet is a global environment using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the European Economic Area, although the data will always be held securely and in line with the requirements of UK data protection legislation. By communicating electronically with us you acknowledge and agree to our processing of personal data in this way.

