



## **Place for Hope Privacy Notice (general)** **updated version 3; approved December 2021**

Place for Hope (Charity Number: SC045224) (“our” or “we” or “the organisation”) act as a data controller in respect of your personal information and this means that we are responsible for deciding how we hold and use personal information about you.

The person with responsibility for data protection compliance is Helen Boothroyd: [helen.boothroyd@placeforhope.org.uk](mailto:helen.boothroyd@placeforhope.org.uk). For data breaches or complaints about how your personal data has been handled, please contact the Director Carolyn Merry: [carolyn.merry@placeforhope.org.uk](mailto:carolyn.merry@placeforhope.org.uk); 07810 208 894.

We collect and process a variety of personal data relating to employees, volunteers, job applicants, people who provide us with services, people who use the services that we provide, donors and supporters. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

Please contact [Helen Boothroyd](#) as soon as possible after there is any change to your personal details, including your contact details.

### **What is ‘personal information’?**

Your 'personal information' means any information about you from which you can be identified - either by reference to an identifier (for example your name, location data or online identifier (e.g. IP address) or from factors specific to your physical, cultural, or social identity (e.g. your social background, outside interests etc).

It does not include information where the identity has been removed (such as anonymous information).

### **Employees and Practitioners – separate privacy notices**

For Employees, please refer to the organisation’s separate [Employee Privacy Notice](#).

For Practitioners, please refer to the organisation’s separate [Practitioner Privacy Notice](#).

### **Summary tables**

The tables on the following pages summarise:

- Personal information we collect & process
- Special category data we collect & process
- How we collect personal information
- Any sharing of personal information
- Our legal basis and purpose for processing
- Retention periods
- Any consequences of not providing personal data

**Volunteers:** including but not limited to Trustees & Patrons

<p><b>What personal information do we collect &amp; process?</b></p>	<p>May include (but not limited to): name; contact details including email &amp; telephone number; date of birth; national insurance number; nationality; employment; directorships &amp; business interests; other trusteeships; membership of organisations &amp; public bodies; photographs/videos.</p>
<p><b>Special category data</b></p>	<p>May collect &amp; process special category data on religious affiliation to ensure a mix of faith community representation on the Board of Trustees.</p>
<p><b>How do we collect your personal information?</b></p>	<p>Directly from you in a variety of ways, e.g. through a declaration of interest form and email correspondence.</p>
<p><b>Who do we share your personal information with?</b></p>	<p>Internally with staff as necessary for the performance of their roles. Third parties listed later in this Notice for the purposes detailed there. E.g. where a Trustee is a bank account signatory, we will share your personal information with the bank.</p>
<p><b>What is the legal basis and purpose?</b></p>	<p><b>In most cases:</b></p> <ol style="list-style-type: none"> <li>1. to perform the <b>agreement</b> we have entered into with you for the purposes of the volunteering role;</li> <li>2. to ensure we are complying with our <b>legal obligations</b>, e.g. to maintain an up-to-date Trustee register;</li> <li>3. where we have a <b>legitimate interest</b> in processing other data such as contact details to maintain the volunteering relationship.</li> </ol> <p><b>Also</b> in the following circumstances, but this is likely to be rare: with your specific consent; where we need to protect your interests (or someone else's interests); where it is needed in the public interest.</p> <p>We collect <b>special category personal data</b> on religious affiliation as the legitimate activity of a not-for-profit body with aims relating to religion.</p>
<p><b>For how long do we keep your personal information?</b></p>	<p>Generally for the duration of your volunteering. Some personal records may be retained 7 years after the period of service, e.g. those provided for the Trustee Register.</p>
<p><b>What if you do not provide personal data?</b></p>	<p>Some volunteers may have obligations to provide the organisation with data, e.g. Trustees. Certain information is needed to work with volunteers, e.g. contact details. Failing to provide such data may make it difficult or impossible to use your services as a volunteer.</p>

## People who apply for jobs

<b>What personal information do we collect &amp; process?</b>	May include (but not limited to): name; contact details including email & telephone number; details of qualifications, skills, experience, and employment history.
<b>Special category data</b>	May collect & process special category data including (but not limited to): a disability for which the organisation needs to make reasonable adjustments during the recruitment process; entitlement to work in the UK; information about religion, either provided voluntarily as part of an application or because required in accordance with the Equality Act 2010 Sch. 9, Para 3.
<b>How do we collect your personal information?</b>	Various, e.g. data might be contained in application forms, obtained from a passport or other identity document, or collected through interviews or other forms of assessment. Data will be stored in IT systems (including email). Application forms may be stored in hard copy during recruitment.
<b>Who do we share your personal information with?</b>	We will not use your personal data for any purpose other than the recruitment exercise for which you have applied. It will be shared internally, including with the Director, interviewers, and other staff if access to the data is necessary for the performance of their roles. Recruitment processes are not based on automated decision-making.
<b>What is the legal basis and purpose?</b>	<ol style="list-style-type: none"> <li>1. <b>Legitimate interest</b> in processing personal data during the recruitment process which allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.</li> <li>2. <b>To respond to and defend against legal claims.</b></li> <li>3. Processing health information, which is a special category of data, if we need to make reasonable adjustments to the recruitment process for candidates who have a disability to <b>carry out our obligations and exercise specific rights in relation to recruitment for employment.</b></li> <li>4. Processing information about religion, which is a special category of data, for any role for which it is an occupational requirement to be a member of a faith community <b>in accordance with the Equality Act 2010 Sch. 9, Para 3.</b></li> </ol> <p>Rarely, we may also process your personal information: with your specific consent; where we need to protect your interests (or someone else's interests); where it is needed in the public interest.</p>
<b>For how long do we keep your personal information?</b>	We will hold the data of unsuccessful applicants on file for six months after the end of the relevant recruitment process after which it will be deleted or destroyed.
<b>What if you do not provide personal data?</b>	Applicants are under no statutory obligation to provide personal data to the organisation during the recruitment process. However, if you do not, we may not be able to process your application properly or at all. Except in the case of jobs which require the post holder to be a member of a faith community in accordance with the Equality Act 2010 Sch. 9, Para 3, there is no expectation that you should provide information about your religion or philosophical belief system and there are no consequences of not doing so.

### People who use training & support services and attend events

<b>What personal information do we collect &amp; process?</b>	May include (but not limited to): name; contact details including email & telephone number; role; and in some cases faith affiliation. Data on faith affiliation often relates to a client organisation rather than to individuals.
<b>Special category data</b>	May collect & process special category data on religious affiliation of individuals, e.g. to assess the reach of our training courses across different faiths and denominations.
<b>How do we collect your personal information?</b>	Provided by a client, directly by parties in a mediation, or by yourself as a training or event participant either during an initial contact or subsequently, e.g. booking form, intake process.
<b>Who do we share your personal information with?</b>	Internally with staff as necessary for the performance of their roles. With third parties where this is required to provide you with the service requested, e.g. to manage payments or bookings. Third parties with whom we may share information are detailed later in this Notice.
<b>What is the legal basis and purpose?</b>	We have a <b>legitimate interest</b> in processing personal data of those who contact us about services and others in their organisations to provide these services, e.g. members of the local faith community needing training or support. Where we process <b>special category personal data</b> on the religious affiliation of individuals, this is either as part of the legitimate activity of a not-for-profit body with aims relating to religion, or by consent. We use attributed quotes from feedback in our marketing and promotional material only with your explicit and freely given consent. We only use personal data to provide the service requested, to deliver our purposes as a registered charity, or for other closely related purposes, e.g. to contact people who have received training to let them know about other similar training courses which might be of interest to them. The statistical information we provide to our funders is usually anonymised; if we wish to use your personal data for this purpose, we will seek your consent.
<b>For how long do we keep your personal information?</b>	We will review every 5 years whether it is still important for delivering our purposes to continue to hold your personal data. You can ask for its erasure at any time. Both electronic and any manual copies of data will be destroyed at the time of erasure.
<b>What if you do not provide personal data?</b>	You are under no obligation to provide the personal data we request, but if you do not, we may not be able to provide the requested service.

	<b>People contracted to supply specific services</b>	<b>Donors</b>
<b>What personal information do we collect &amp; process?</b>	May include (but not limited to): name; contact details including email & telephone number.	May include (but not limited to): name; contact details including email, postal address & telephone number; amount and date of donation, gift aid eligibility.
<b>Special category data</b>	N/A	N/A
<b>How do we collect your personal information?</b>	Directly from you in a variety of ways, e.g. email, invoice.	Directly from you in a variety of ways, e.g. website donations page, email, postal communication
<b>Who do we share your personal information with?</b>	Internally with staff as necessary for the performance of their roles. With third parties where this is required to fulfil our obligations to you, e.g. payment of an invoice, or for you to fulfil the role for which we have contracted you, e.g. sharing supervisor contact details with practitioners.	Internally with staff as necessary for the performance of their roles. With third parties where this is required to provide you with the service requested, e.g. to manage secure payments online.
<b>What is the legal basis and purpose?</b>	Legitimate interest in processing personal data to make use of the service provided under the contract or other agreement.	Legitimate interest in processing personal data to allow you to donate to us, provide acknowledgement and keep a record of your donation within our financial systems.
<b>For how long do we keep your personal information?</b>	We will retain your personal data until the end of the consultancy arrangement, and for up to 5 years afterwards in case we wish to use your consultancy service again.	We retain financial data for 7 years. this period will apply from the last date of donation if you give regularly or more than once. We will review any other personal data we hold for you after 5 years to see whether it is still important for our legitimate interest to hold it, but you can ask for its erasure at any time.
<b>What if you do not provide personal data?</b>	Where we are relying on contractual obligation and/or legal obligation as a legal basis for collecting and processing your personal data, we will not be able to offer our services to you if you choose not to provide us with this information.	Failing to provide the personal data we request from you may make it difficult or impossible to process your donation.

**Supporters & Peacemakers Network**
**People who contact us via social media**

<b>What personal information do we collect &amp; process?</b>	May include (but not limited to): name; email; location; and in some cases role and faith affiliation if provided voluntarily.	Private or direct messages from those who contact us via social media.
<b>Special category data</b>	May collect & process special category data on religious affiliation of individuals, e.g. to assess our supporter reach across different faiths/denominations and to tailor the e-newsletter to help deliver our charitable purposes.	N/A
<b>How do we collect your personal information?</b>	Directly from you in a variety of ways, e.g. online sign-up form or by signing up at events.	We use a third-party provider, Hootsuite, to manage our social media interactions.
<b>Who do we share your personal information with?</b>	Internally with staff as necessary for the performance of their roles. We use a third-party provider, Mailchimp, to deliver e-newsletters. We review statistics around email opening and clicks using industry standard technologies provided by Mailchimp to help monitor use of and to make improvements to the e-newsletter.	Internally with staff as necessary for the performance of their roles. Other than Hootsuite as detailed above, personal information in messages is not shared with any other third parties.
<b>What is the legal basis and purpose?</b>	We process the personal data of our supporters, mostly those who sign up to join the Peacemakers Network mailing list, by consent for the purpose of keeping them informed about our news, work, and events through an e-newsletter.	Legitimate interest in using social media to interact with our contacts to carry out the work of the charity.
<b>For how long do we keep your personal information?</b>	Your personal data is retained until the data subject opts out of receiving the e-newsletter, after which it will be destroyed unless the organisation seeks and receives consent to retain it for another purpose.	Your messages are stored by Hootsuite for 3 months.
<b>What if you do not provide personal data?</b>	Providing personal data or joining the Peacemakers Network or supporting us in any other way is entirely voluntary.	Social media interaction with us is entirely voluntary.

### **Legitimate interests**

Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of data subjects and has concluded that they are not.

### **Consent**

We will only seek and rely on your consent where you are fully informed, and your consent can be freely given. There may be circumstances where we will approach you to obtain your explicit consent to allow us to process certain particularly sensitive data, or other personal information.

If so, we will provide you with full details of the information that we require and the reason we need it, so that you can carefully consider whether you wish to consent. You do not have to provide your consent. You have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for that purpose. If you wish to withdraw your consent, please contact Helen Boothroyd: [helen.boothroyd@placeforhope.org.uk](mailto:helen.boothroyd@placeforhope.org.uk).

### **Visitors to our website**

We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns on [www.placeforhope.org.uk](http://www.placeforhope.org.uk) to find out things such as the number of visitors to the various parts of the site. This data is anonymised. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we wish to collect personally identifiable information through the website, we will be transparent about this and seek consent, making it clear when personal data is sought and explaining how the data will be used.

We receive and record information from your browser when you use the site and use cookies to collect this information. Cookies are small removable data files that are stored by your web browser on your computer's hard drive. These allow you to carry information across our site without having to re-enter it; it also enables us to analyse web traffic and improve our online services. They cannot be used to identify you. You may set your web browser to notify you of cookie placement requests or to decline cookies completely. You can delete the files that contain cookies. If you do not wish to receive cookies you can modify your web browser to refuse cookies, or to notify you when you receive a new cookie. However, you may not be able to use all the interactive features of our site if cookies are disabled. To enjoy our website to the full, we recommend that you leave them switched on. If you have registered with us or if you continue to use our website, you agree to our use of cookies.

### **Links to Other Websites**

This Privacy Notice only relates to Place for Hope. If you link to third-party websites from our main website, you should remember that this is not our website and therefore you should read the terms and conditions and Privacy Notice on those third-party websites before continuing. We are not responsible for any use of your information that is made by other websites and/or organisations.

## **Third Parties**

The organisation may have to share personal data with third parties where we are legally required to disclose or report specific matters should they arise in the course of our work, e.g. for safeguarding.

The following third parties may have access to your personal information for the purposes noted below:

- Microsoft hosts our emails on Outlook in Office 365 and any documents stored to Office 365 applications, processing personal data in the UK;
- Dropbox hosts our file storage, processing personal data in the US;
- Mailchimp, which we use for e-newsletters, processing personal data in the US;
- Salesforce hosts our cloud-based database, processing personal data in the UK and US;
- Hootsuite manages our social media interactions, processing personal data in the UK and Canada;
- third-party providers to manage payments or bookings, e.g. Stripe, Eventbrite, and Google suite, processing personal data in the UK, EU, and US;
- third-party providers to manage our website functions, e.g. Expression Engine and Google Analytics processing personal data in the UK, EU, and US;
- Intego, which is our anti-virus provider, processing personal data in the UK and US;
- Vodafone which is our mobile telephone provider;
- Easybooks accounting system, processing personal data in the UK and US;
- our independent examiner and accountant who is currently Paul Clelland Accountancy, processing personal data in the UK;
- our insurance providers who are currently Keegan and Pennykid, processing personal data in the UK;
- our current account banking providers who are currently CAF Bank, processing personal data in the UK;
- our funders or other grant providers where required e.g. personal information for funding applications or required for reporting on outcomes and outputs;
- any other person who is authorised to act on your behalf (for example, the NHS and/or family members);
- any relevant dispute resolution body or the courts;
- persons or organisations in connection with any merger, disposal, reorganisation, or similar change in our charity;
- regulators, government departments, law enforcement authorities, tax authorities, professional advisers, financial institutions, and insurance companies;
- third parties providing a reference about you, where you have agreed that we can request this or have asked us to request it.

In these circumstances, we require third parties to ensure the security of your personal information and to treat it in accordance with the law.

## **How do we keep your personal information secure?**

Data is stored in a range of different IT systems (including the organisation's email). We use encrypted systems for online processing and storage and anti-virus protection on all staff laptops. All laptops and mobile phones used by our staff are password protected with auto-lock facilities enabled. Email security is a priority, and staff and practitioners are asked to avoid sharing personal information by email.



Our password policy requires:

- The use of complex passwords which would be hard to guess;
- Secure password storage;
- Password sharing between staff as an exception, only where operationally necessary and never regarding the storage of financial or other sensitive information;
- Additional security for financial and other sensitive information, including only password hints being held in secure storage and multi-factor authentication.

Personal information is only accessible to staff members who require it to perform their role. Personal information is only shared with volunteers, e.g. practitioners, trustees or volunteers assisting with financial systems, only where a specific piece of information is required for the task they are being asked to perform. Volunteers do not have access to our database.

Personal information is not generally held in hard copy. Any hard copy personal information that is required to be held is:

- stored by only one person if possible;
- stored in a locked container;
- shredded at the end of the retention period.

#### **Where do we store your personal information?**

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA). However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to correspond with you. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

We also may transfer data outside the UK or the EEA where our, service providers host, process, or store data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the UK and/or European Commission or is otherwise made in circumstances where appropriate safeguards are in place to protect your data in accordance with the UK data protection legislation (e.g. standard contractual clauses, EU-US Privacy Shield compliant, etc.).

#### **Your rights in relation to your personal information**

You have rights in relation to the personal information that we hold about you, including:

- the right to access the personal data held about the you by making a subject access request in accordance with the data protection legislation. We may charge a reasonable fee when a request is manifestly unfounded or excessive;
- the right to have your personal data rectified if it is inaccurate or incomplete;
- the right to request to have your personal data deleted in certain specific circumstances as set out in the data protection legislation;
- the right to request to restrict the processing of your personal data in certain specific circumstances as set out in the data protection legislation;
- the right to ask us not to process your personal data for marketing purposes (you may opt out of our marketing communications at any time by clicking the “unsubscribe” link at the end of our emails, sending us an “opt-out” text message and/or contacting Helen Boothroyd: [helen.boothroyd@placeforhope.org.uk](mailto:helen.boothroyd@placeforhope.org.uk); however we may maintain a suppression list with your name and contact details to ensure that we do not continue

to contact you after you have asked us to stop, or for purposes based on our legitimate interests);

- the right to ask us to not undergo automated decision making;
- where you have provided consent, the right to request to withdraw such consent at any time; and
- the right to make a complaint to the Information Commissioner's Office (the UK supervisory authority for data protection issues) at any time ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and ask that you please do contact us in the first instance.

If you want to make one of these requests, please put your request in writing to Helen Boothroyd: [helen.boothroyd@placeforhope.org.uk](mailto:helen.boothroyd@placeforhope.org.uk).

Please note, we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will normally respond to a request within a period of one month from the date it is received. In some cases, such as where we process large amounts of your data, we may respond within three months of the date the request is received. We will write to you within one month of receiving the original request to tell you if this is the case.

We may not always be able to comply with your request to exercise your rights for specific legal reasons which will be notified to you, if applicable, at the time of your request. If a data subject access request (DSAR) is manifestly unfounded or excessive, we are not obliged to comply with it. Alternatively, we can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A DSAR is likely to be manifestly unfounded or excessive where it repeats a request to which we have already responded. If we consider this to be the case, we will notify you of this and of whether or not we will respond to the request.

### **Review**

This privacy notice will be reviewed annually, but we may update, or otherwise amend, this Privacy Notice at any time.

This document was last updated on 10 November 2021. It was considered and recommended for approval by the Policy and Practice Forum on 15 November 2021 and approved by the Board of Trustees on 7 December 2021.

### **Contact**

If you have any questions regarding this Privacy Notice, how we handle your personal information or you would like to update the information we hold about you, please contact Helen Boothroyd: [helen.boothroyd@placeforhope.org.uk](mailto:helen.boothroyd@placeforhope.org.uk).

If you are unhappy about how we process your personal data, you can:

- submit a complaint to Director Carolyn Merry: [Carolyn.merry@placeforhope.org.uk](mailto:Carolyn.merry@placeforhope.org.uk) or
- notify the Information Commissioner's Office (ICO) by calling their helpline on: 0303 123 1113.