

GivingTime Privacy and Online Policy

August 2020

Section A - Privacy Policy

1. Introduction

GivingTime, a registered charity with the charity number 1176752 ("we", "us" and "our"), is committed to safeguarding information provided to us by any person who it deals with ("you") from which any person can be identified, such as names, contact details and ID data ("Personal Information"). This includes the Personal Information of our GivingTime volunteers ("Volunteer(s)"); the young people who take part in the GivingTime programme ("Students") and all visitors to the website <https://givingtime.org.uk/> (our "Website").

This policy sets out how we will handle any Personal Information we collect from you, that you provide to us, or we otherwise receive. We will only use Personal Information as set out in this policy and will ensure that your Personal Information is handled in accordance with the data protection laws that apply to us.

In this policy, "Data Protection Legislation" means the UK Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any other applicable laws.

GivingTime controls is the data controller, meaning that GivingTime determines what happens to the Personal Information that you provide.

Personal Information will be held by GivingTime in confidence in accordance with the Data Protection Legislation. Please read the following carefully to understand our practices regarding your Personal Information and how we will treat it. **If you need any of this policy explaining to you, please feel free to contact: dino@givingtime.org.uk.**

By visiting our Website you accept and consent to us collecting, using and transferring your Personal Information as described in this policy. GivingTime may make changes to this Policy from time to time and so you should check this page frequently to ensure that you are happy with them.

2. Information we may collect from you

We may collect and process Personal Information about you from any of the following means:

(i) *Directly*

- You may give us Personal Information about yourself by: registering as a Volunteer or a Student or as a point of contact for a school, GivingTime location or other partner; filling in forms on our Website and/or by communicating with us by phone, email or otherwise.

- The Personal Information you give us may include your name; date of birth; address; e-mail address or phone number. If you register as a Volunteer you may provide your employment details, DBS certificate or other background checks, any personal description provided, proof of identification and photograph.
- Where you provide Personal Information on behalf of another individual, you are responsible for telling that individual that you have provided their Personal Information to us and directing them to this Policy so they can see how we will process their Personal Information.

(ii) *Automatically*

Where you make use of our Website we may also collect information about your use of the Website (e.g. your IP address). Some of this Personal Information is collected and processed for the purpose of legal compliance and some for the purposes of our legitimate interests (e.g. so that we can look closer into how our Website is used).

(iii) *Cookies*

In addition, we and our authorised third parties may use “cookies” and/or other tools to store and sometimes track information about you. This is pretty common practice used by many online services. We do this to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our site. For more information about how we use cookies please visit here: <https://givingtime.org.uk/cookie-policy/>

You can restrict, remove or block cookies or tracking services through your browser settings at any time (see below). Certain cookies may be set as soon as you use a website, but you can remove them by enabling the Do Not Track (or DNT) preference in your browsing settings. This will let websites know that you do not want them collecting certain information about you. For more information about how to do this, you can visit: allaboutcookies.org and youronlinechoices.eu

3. Information we receive from other sources

We may receive Personal Information from other sources including third parties we work with (such as schools and partners) who have confirmed to us they are authorised to pass your information on to us and we may share this data internally.

Volunteers and/or Students who may also give us emergency contact information as part of our emergency scenario planning.

Where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Policy and obtaining any relevant consents from you to ensure you are happy with the ways in which your Personal Information will be used.

However, once we are holding it, we will only handle any person's Personal Information in accordance with this Policy.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out in paragraph 5 below (depending on the types of information we receive).

4. Sensitive Personal Information

"Sensitive Personal Information" is defined under the Data Protection Legislation but more easily understood as Personal Information that is particularly sensitive in nature such as information about an individual's race or ethnicity, religious beliefs, physical or mental health or sexual orientation.

Given the nature of the GivingTime programme, you may disclose Sensitive Personal Information to us whilst you are on the programme or otherwise communicate with us. Our coaches will not record and/or disclose any Sensitive Personal Information about you unless it is necessary to follow the GivingTime Safeguarding Policy and Procedure and/or instructions from the GivingTime Safeguarding Officer, instructions from the police or local authorities and/or the law. Where we do receive and retain Sensitive Personal Information, we will only keep such information for as long as strictly necessary in order to comply with our obligations under the Data Protection Legislation and the law.

We may process Sensitive Personal Information so that we can: (i) protect the vital interests of the data subject where they are physically or incapable of giving consent; (ii) safeguard children or individuals at risk or the prevention or detection of an unlawful act; or (iii) carry out the obligations and exercising the specific rights in the field of social protection law.

5. What we do with your Personal Information

We use Personal Information (other than Sensitive Personal Information) held about you to the extent this is necessary for our legitimate interests. In particular, we would expect to use your Personal Information in the following ways:

- (i) *Personal Information you give to us.*
 - to help us to provide you with the information required for your participation in the GivingTime programme;
 - to help us improve the Website, the experience you have and the quality of our services;
 - to send, with your permission, newsletters, updates and useful information about volunteering and how to get involved; and
 - to ensure that content from our Website is presented in the most effective manner for you and for your device.

- (ii) *Personal Information we collect about you by other means.*
 - to administer our Website and for internal operations, including troubleshooting, data analysis, testing, improvements, research, statistical and survey purposes;
 - to improve our Website to ensure that content is presented in the most effective manner for you and for your device; and
 - to keep our Website safe and secure.

6. Disclosure of your information

We may share your Personal Information with selected third parties including: Volunteers, Young People, Schools, partners, our contact at a GivingTime coaching location and other third parties where it is necessary to enable us to provide the GivingTime programme.

We may also disclose your Personal Information to or share it with third parties:

- if we are under a duty to do so in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; and/or
- to protect the rights, property, or safety of GivingTime, our Volunteers, our Students, or others; and/or
- as necessary to follow the GivingTime Safeguarding Policy and Procedure and/or instructions from the GivingTime Safeguarding Officer, instructions from the police or local authorities and/or the law. This also applies to the disclosure of Sensitive Personal Information.

GivingTime will never sell your Personal Information. Where you have consented to this, we may send you updates on GivingTime and how you can stay involved with the GivingTime programme.

7. Where we store your Personal Information

The data that we collect will be stored on a server within the United Kingdom, however, this data may be processed outside the European Economic Area ("EEA") by one of our suppliers. By submitting your Personal Information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

This means that we will only transfer your Personal Information outside the EEA or the UK if: (a) the receiver of the Personal Information is located in a country that the European Commission has confirmed gives the right level of protection to individuals' Personal Information, (b) the receiver of the Personal Information has put in place a transfer mechanism approved under the Data Protection Legislation such as the European Commission's "model clauses"; or (c) we have your explicit consent to do so. Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by using the contact details in Section 11.

By submitting your Personal Information to us, you acknowledge and agree to this transfer, storing and processing of your Personal Information.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Your rights

You have the right to ask us not to process your Personal Information for marketing purposes. We will request your consent to use your Personal Information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by indicating via the method provided on the forms we use to collect your Personal Information. You can also exercise the right at any time by sending us a Privacy question on our Contact page.

Our site may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Information to these websites.

9. Access to and updating your information

You are entitled to know some details about the Personal Information we hold about you and how that information is processed. If you would like to request this, please contact us using the contact details below and we will provide you with the information to which you are entitled.

You can also ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) in some circumstances, transfer any information we hold about you to a specified third party. If you wish to exercise any of these rights, please contact the Data Protection Coordinator, Dino Laudato by email at dino@givingtime.org.uk.

10. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

11. Contact

Should you have any queries or complaints in relation to how we use your Personal Information, please contact the Data Protection Coordinator, Dino Laudato by email at dino@givingtime.org.uk. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

Section B - Online Policy

This online policy has been drawn up to protect Students in their use of the internet, online communications and technology ("online") as part of the GivingTime programme, as we believe that

being online is beneficial for Student's education and development as long as sufficient safeguards are in place to keep Students safe. This online policy applies to all Students, Volunteers and anyone involved in GivingTime's activities.

In accordance with our diversity policy, we believe that we have a responsibility to keep all Students safe (regardless of factors such as age, disability, gender reassignment, race, religion or belief, sex or sexual orientation) when participating in the GivingTime programme whether online or otherwise, regardless of whether the network and devices used are personal or owned by a School or GivingTime.

We seek to keep Students and Volunteers safe online where the GivingTime programme is delivered online by:

- our safeguarding lead being engaged as to the potential harms posed by being online, contactable by email safeguarding@givingtime.org.uk;
- providing direction to Students and Volunteers on how to behave online;
- incorporating online safety to the agreement that our Students and Volunteers sign up to;
- developing clear and robust procedures to enable us to respond to any incidents of any inappropriate online behaviour;
- providing guidance to Volunteers with regards to using their personal devices for GivingTime activities;
- having safeguarding procedures in place and providing safeguarding training to all Volunteers; and
- [recording coaching sessions when they are conducted online (with the Student's prior consent)].

Reviewed: August 2020

Next review: December 2020