Website Privacy Policy

Post holder responsible for Policy	Chief Executive Officer
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Updated by	Chief Executive Officer
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This policy should be read in conjunction with:

Data Protection Policy

Charity Number: 1094599

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Section 1

Overview

Open Door Exmouth relies on the support of individuals to carry out our crucial work in the community. We want to be completely transparent about why we need the personal details we request when you communicate with us, and how we use the data once we collect it. We take protecting your privacy very seriously and will always take all reasonable steps within our power to make sure your information is safe. If you're an Open Door client, service user, member of staff or volunteer, please refer to Open Door's Data Protection Policy

What information do we collect?

- Name, address, telephone number, mobile number, email addresses
- Contact preferences
- Bank account details
- Gift Aid status
- Date of birth
- Records of your correspondence and engagement with us
- Images, photographs or video if you take part in an event with us, provided that you have given your consent
- Survey responses

We may not collect all this information for everyone. We collect different types of information for staff and volunteers than we do for supporters for example. This information may be collected via:

- Paper forms
- Telephone conversations or face-to-face meetings
- Digital forms completed via our website or third party websites such as Just Giving or CAF Donate
- Publicly available sources
- Communication via social media

We will let you know before collecting your data whether it is part of a statutory or contractual requirement or obligation, and the possible consequences of not providing the information.

Section 2

How do you use my information?

Depending on the specific purpose, we may process your information on the following legal bases:

- With your consent
- To enter into or to perform a contract with you
- For our legitimate company interests or activities as a not-for-profit body
- Where necessary to perform a task in the public interest
- For compliance with our legal or social protection obligations including safeguarding

We may use your personal information for the following purposes:

- To update you about the work of Open Door Exmouth including emails, newsletters, appeals, legacy gifts and fundraising activities.
- To administer your donation or support your fundraising, including processing Gift Aid
- To respond to your enquiries including requests for support or services.
- As and when required by law.

How do you share my information?

We do not sell or share personal data to third parties for the purposes of marketing, fundraising or campaigning purposes.

Suppliers

We may allow our suppliers to access and use your personal data to allow them to perform services on our behalf, such as payment processing, and maintenance and support of our systems. In these circumstances we will not give these organisations any rights to use your personal information except to provide services to us and in accordance with our instructions. We use a third-party provider to send newsletters and email updates. We will maintain the information sent via email in accordance with applicable laws and regulations. In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the email is from and provides clear information on how to contact Open Door. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting our Administrator using the contact details at the bottom of this policy.

Website

You can visit the website without telling us who you are or revealing any information by which someone could identify you as a specific, identifiable individual. If, however, you wish to use some of the website's features, you may be asked to provide certain personal information (for example, your name and email address). We receive and store any information you knowingly provide to us when you fill in any online forms on the website.

You can choose not to provide us with your Personal Information, but then you may not be able to take advantage of some of the Website's features.

Your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

1. Your data will be made available to our website provider
2. The data that may be available to them include any of the data we collect as described in this privacy policy.
3. Our website provider will not transfer your data to any other third party, or transfer your data outside of the European Economic Area.
4. They will store your data for a maximum of 7 years.
5. This processing does not affect your rights as detailed in this privacy policy.

Associated organisations

We may share anonymised data with other similar charities to further our charitable aims. You cannot be identified from this data.

Organisations who are supportive of our aims

We may share data with other supportive organisations, including legal advisors in partner organisations, to further our objects and charitable aims or for fundraising purposes. We only share your information for these purposes when we have your permission to do so. You can change your mind at any time by contacting us using the details below.

Police or Social Services

There are exemptions within data protection regulations that mean we are under legal obligations to share limited data. This includes the prevention and detection of crime, to prevent benefit fraud and for safeguarding purposes.

Section 3

How do you protect my information?

We take appropriate technical and organisational measures to ensure that we (and our service providers) keep your information secure, accurate and up to date. Unfortunately, the transmission of information over the internet is never 100% secure. This means you provide information through our website and our social media pages at your own risk.

Open Door Exmouth has additional security measures in place to protect the sensitive personal data we process. Our secure system can only be accessed by authorised people at Open Door. Access to the system is monitored and our employees are required to undertake data protection training.

How long do you hold my information?

We will retain your personal information for the period necessary to fulfil the purposes in this Notice unless a longer retention period is permitted by law. Different types of information are held for different periods of time in accordance with our Data Protection Policy. For example, HMRC requires that we maintain a record of as gift using Gift Aid for seven years after your last donation to us.

You can request deletion of your personal information at any time, by contacting the Administrator (details at the end of this policy)

What happens if there is a data breach?

In the event we become aware that the security of the website has been compromised or users personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we must also notify the Information Commissioner's Office within 72 hours.

In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law.

Section 4

What are my personal information rights?

To be informed: we must provide fair processing information typically through our privacy notice.

Subject Access Request (SAR): you can write to us to ask for a copy of the information we hold about you.

Correction: we will use all reasonable endeavours to ensure the accuracy of your personal information. It is your responsibility to ensure that you submit true, accurate and complete information to us. You can have any inaccuracies in your information corrected.

Deletion: you can ask us to delete all your personal information in certain circumstances (for example, if the information is no longer necessary).

Objection/marketing: you can object to us processing your data in certain circumstances. If you no longer wish to receive communications from Open Door, you can contact our Administrator (details listed above).

Restriction: you can ask us to pause processing your information in certain circumstances (for example, if you are disputing its accuracy).

Portability: you can ask us to transfer your information electronically to another organisation in certain circumstances.

Withdrawal of consent: you can withdraw your consent at any time.

All of these rights are free to exercise. We will aim to respond within one month unless we need to extend the time frame for certain reasons. You can make any of the above requests by contacting our Administrator in one of the ways described above.

Other Information

Transfers of your personal information: At all times, we intend to store and process your personal information within the European Economic Area. Should this ever change, we would take steps to ensure your personal information is only transferred once adequate safeguarding is in place.

Third party sites: Our website may have links to other websites we do not operate. You should read the privacy notices on those websites before you submit your personal information.

Changes to this notice: From time to time, we may revise this notice. Updated versions will be posted on the website.

If you have a complaint about the way we process your information, we will aim to address these concerns as soon as we can. However, if you would like to, please direct your complaint directly to the Information Commissioner's Officer (www.ico.org.uk). This website has further information on your rights and our obligations.

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