



**Privacy Statement**

## About us.

FiND is a local charity serving Hull and the East Riding, providing services for young people aged 12 upwards with severe learning disabilities including autistic spectrum condition and complex needs.

FiND (*referred to as 'we', 'us' or 'our within this document*) is the 'data controller' of the information which you provide us, which means we control the way information is used and processed.

At FiND, we are committed to maintaining the trust and confidence of our visitors to our website and those who sign up to receive further correspondence. FiND will not sell, rent or trade email lists with other companies and business for marketing purposes. Within this policy, we've provided lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others, how we keep it secure and your legal right regarding this.

## How we will collect your Information.

**Direct Interaction:** You may provide us with your personal information when corresponding with us via post, phone, email or in person. This includes personal data provided when you

- Request information on our services,
- Requesting marketing material being sent to you,
- Booking in to attend an event hosted by FiND (including guest speakers),
- Pay for goods or services,
- Contact us regarding compliments, comments or complaints,
- Subscribing to our newsletters, publications and events,
- Entering a competition, promotion or survey,
- Providing us with feedback,
- By sending us emails or text messages.
- By interacting with us on social media platforms such as Facebook or Twitter.

**Automated Technologies:** As you interact with our website, we may automatically collect data about browsing actions and patterns. We collect this data using analytical software, server logs and other similar technologies. This allows us to understand what services our visitors are more interested in and allows us to communicate with our customers more effectively.

## Mailing Lists:

As part of the registration process for our e-newsletter and fundraising events, we collect personal information. We use that information for a couple of reasons: to tell you about things you've asked us to tell you about; to contact you if we need to obtain additional information; to check our records are right and to check every now and then that you are

happy and satisfied. FiND do not rent or trade email lists with other organisations and businesses.

## **What data we collect.**

We may collect, store and use the following categories of personal information about you.

- 1) Identity Data: Title, first name, surname, address, gender, date of birth.
- 2) Contact Data: Correspondence address, billing address, email address, telephone numbers.
- 3) Financial Data: Bank account, Payment card details.
- 4) Usage Data: Information about how you use FiND's website and the information which you view.
- 5) Aggregated Data: We also collect data, use and may share Aggregated Data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of website visitors accessing a specific website feature. If we connect aggregated data to your personal data so it can directly or indirectly identify you, we treat the data as personal data which will be used in accordance with this privacy notice and GDPR guidelines.

## **How will we use information about you?**

FiND treats the collection, usage and storage of personal data extremely seriously. FiND will only ever use personal data when it is legal to do so and follow the guidelines as set out through the General Data Protection Regulations (GDPR). These include:

- When you have consented to us accessing and using your data,
- When we need to use the data to perform any contract we have entered into with you,
- Where FiND need to comply with our legal obligations,

We may also use your personal information in the following situations (although these are likely to be rare):

- Where we need to protect you interests and or the interests of someone else.
- Where it is needed in the public interest or for official/legal purposes.

In order to help you understand how FiND will use your personal data we have set out below a table highlighting this. Note that we may use your personal data for more than one lawful ground depending on the specific purpose which we are using the data for. Please contact us if you would like more information regarding this.

Purpose	Type Of Data	Lawful Basis For Proceeding
To register your enquiry into our services (and or the request for promotional material).	Identity Contact	Your consent Necessary for our business interest enabling us to send you the required information.
To manage our relationship with you:  A) Notifying you about changes to our terms and or privacy policy. B) Asking you to complete a review or survey. C) Responding to your comments, complaints and or social media comments.	Identity Contact, Marketing & Promotions.	Your consent. Necessary to comply with our legal obligations. Necessary for our business interest enabling us to ensure our records are up to date and ensure customer satisfaction.
To enable you to complete surveys, participate in competitions and prize draws.	Identity Contact, Marketing & Promotions	Your consent. Necessary for our business interest enabling us to identify customer trends and wishes and developing the charity using this data.
To protect our business and the website (Includes troubleshooting, testing & maintenance).	Identity Contact	Necessary to comply with our legal obligations. Necessary for our business interest to ensure effective provision of IT systems, improving security and preventing fraud.
To provide you with e-newsletters, details of fundraising events and other relevant information.	Identity Contact	Your consent. Necessary for our business interest to ensure we communicate effectively with our stakeholders.
To use data analytics gathered from our website to identify service demand and customer focus.	Technical	Necessary for our business interest for the construction of FiND's strategic development plan.
To share and discuss feedback from compliments, complaints, comments (Including social media platforms).	Identity Contact	Your consent. Necessary for our business interest to ensure customer satisfaction, learning & development and the resolution of concerns or complaints.

\*This list covers key areas but is not an exhaustive list.

## **Children and Young Adults.**

We realise and understand that children and young people, including those under 18 years of age (“minors”) may visit the our website. It is our policy:

- to encourage all minors to consult with their parents or legal guardian before submitting or requesting any content or information to/from us or other third parties. Users of the website, who indicate they are a minor may be asked to provide a valid email address for their parent or guardian so that we may (providing they have their parent or guardian’s permission) verify parental consent, where required;
- not to make a minor's participation in our activity contingent on the child disclosing any more personal information than is reasonably necessary in order to do so.
- not to actively market to minors; and
- not use (or pass to any third party) personal information on persons known to be minors for any commercial purposes.

FiND cannot accept responsibility for minors submitting sensitive information electronically. We advise that all minors are provided with supervision on line and that parental controls are enabled to minimise any potential risks. Any minor using the Online Facilities and services offered is confirming that they have received the consent of their parent or a guardian to do so.

## **Third Party Marketing.**

FiND will get your expressed opt-in consent before we would share your personal data with any company other than FiND for marketing purposes.

## **Change of purpose.**

We will only use your personal information for the reasons we have collected it. However, we may use the data for other reasons if we reasonably consider that we need to use it for another reason that is compatible with the original purpose.

If FiND wishes to use your information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do this. Please note, we may process your personal information without your knowledge or consent, where it is required or permitted by the law.

## **Disclosure of personal data.**

On occasions FiND may have to share or data with third parties who work for the organisation. For example, some personal data will be stored on our IT systems. Consequently, some information may be accessible to our professional consultants who FiND employ to maintain and enhance these systems. This ensures that FiND can offer its customers with continual high standards of service.

## Third Parties:

There are some other reasons why we may disclose your personal information to third parties and these are as follows:

1. To appoint other organisations to carry out some data processing activities on our behalf. For example, mailing services, payment processing, hosting service providers, other relevant partners used to help us deliver our website or services to you;
2. If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about customers will be one of the transferred assets;
3. To protect the rights, property, or safety of us, our commercial partners, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
4. Where we share your personal information with third parties we will take reasonable steps to ensure that it is properly protected and processed in accordance with this Policy.

FiND use the below third party data processors to enable us to provide our business services, marketing activity and run our website. Please read and familiarise yourself with the privacy policies of our UK based third party data processors (*Direct contact with the said companies may be required in order to access these policies*).

- ❖ Jenko – Marketing & website support: <http://jenko.co.uk/privacy-policy>
- ❖ Indicoll – Marketing & website support: <https://indicoll.co.uk/privacy-policy>
- ❖ Marshalls – Accountancy: <http://www.marshallsaccountants.co.uk/legal/privacy.php>
- ❖ Sewells – Health & Safety: <https://sewell-group.co.uk/>
- ❖ Haworths – Legal/HR: <https://howarths-uk.com/privacy-policy-and-cookies/>

In addition, we also use google analytics to establish out website visitor traffic and usage. Google complies with the EU-US Privacy Shield: <https://policies.google.com/privacy>.

At times, FiND may also be required to share data with:

- **Professional advisors/consultants:** Some data may be accessible to professional consultants working for FiND. These include, lawyers, accountants, insurance brokers, IT consultants etc.
- **HM Revenue & Customs, regulators and other authorities:** In some circumstances FiND may have a legal duty to provide specific information to regulatory bodies.
- **The police, local authorities, HMRC, the courts and other government authorities:** FiND will comply with any requests from these bodies when it is legal and lawful for us to do so (e.g. court order).
- **Website & IT Development:** Some data may be accessible to IT experts who support FiND in the design and hosting of our website.
- **Social Media:** The sharing of comments/posts on social media platforms (e.g. Facebook, Twitter) is done so under the terms of the host site. Other organisations control these platforms and although used by FiND are not under our direct control. Consequently, FiND do not have control and do not accept any responsibility for the

sharing of social media posts. It is advised that you review any remarks, comments and photos before posting and that you make yourself aware of the platform's privacy policy as well as their terms and conditions.

### **Third Party Mailing Houses.**

On occasions we may use third party mailing houses for the purposes of postal services. These mailing houses are always UK based.

### **International Transfers.**

It is highly unlikely that FiND will ever transfer your personal data outside of the European Economic Area. However, should there ever be a need for this, FiND will ensure that personal data will only ever be sent to countries that have an adequate level of protection for personal data by the European Commission.

### **Data Security.**

The collection and collation of personal data is carried out in a number of ways. The majority of personal data FiND receives is in an electronic format originating from electronic devices. For example, Newsletter sign ups via our website.

FiND takes the security of personal data very seriously. Consequently, FiND will use appropriate processes, procedures and security measures (passwords, encryption, firewalls etc.) to safeguard this information across all of our IT systems. Sensitive data held in paper format will be stored securely either within the services or within a storage facility.

Further details of FiND's Data Security Policies can be obtained by contacting us directly.

### **How long do we keep your information for?**

Following the guidelines within the GDPR, FiND will only keep the data for as long as we actually need it for the purpose we collected it. Therefore, in most cases FiND will keep your personal information for as long as you remain a customer of the charity. We will keep your data for a short time after this in case you decide to return to us. After this period your data will either be deleted or anonymised so it cannot be linked to you.

By law, FiND has to keep personal data about our customers (contact, identity, financial) for a minimum of 6 years.

Please contact us if you would like to know how long we will keep your details for. You can also make a request for us to delete your details (see below).

## Your rights.

Under certain circumstances, by law you have the right to:

- **Request access:** To the personal information FiND hold on you (known as a data subject request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if the data is complex. In these cases, we will notify you and keep you updated. We may charge a small fee towards the cost of administering any requests you make which is manifestly unfounded, excessive or repetitive. The current fee is £10.00.
- **Request Erasure:** You have the right to ask FiND to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your data to comply with the law. It should be noted that we may not be able to comply with your request for specific legal reasons. In these circumstances, we will notify you as soon as possible.
- **Object to processing:** You have the right to object to us processing your personal information where we are relying on a legitimate interest and there is something about your situation which makes you wish to object to processing on. You also have the right to object to us processing your information for marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which means we can continue to process your information.
- **Request the restriction of processing:** Of your personal information. This enables you to ask us to suspend the processing of your personal data in the following scenario's:
  - A) If you want us to establish the data's accuracy.
  - B) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - C) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to withdraw consent at any time:** FiND are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain information, updates or services. We will advise you if this is the case at the time you withdraw your consent.

All requests set out in this section or other queries should be made in writing and addressed to: The Senior Manager, The Chandler Centre, Belprin Road, Beverley, HU17 0LN. Please ensure you include your name, address and contact details within your request.



## **Changes to this Policy.**

We reserve the right to update this privacy statement at any time and we will provide you with a new policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy statement, please email the Senior Manager on:  
[info@findcharity.org.uk](mailto:info@findcharity.org.uk)

If you are dissatisfied with our response to any of your data privacy concerns you have the right to raise this with the Office of the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>).