The Forget Me Notes Project

Privacy Policy

The Forget Me Notes Project is committed to protecting your personal information. We want your interactions with us to be safe and secure. Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in Forget Me Notes' possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the 'GDPR').

This Privacy Policy relates to our use of any personal information you provide to us on paper, email, phone and at live events. Please read the following carefully to understand our processes regarding your personal data and how we will treat it. We will revise and update this Privacy Policy at intervals, and we will indicate the date of last review at the bottom of this document.

The type of personal information we collect

We comply with the regulations under The Data Protection Act 2018 and GDPR by keeping personal data up to date; by storing and destroying data securely using password protection and locked physical storage; by not collecting or retaining excessive amounts of data; by reviewing data we hold regularly; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We currently collect and process the following personal information:

- Member names, phone number and email addresses
- Donor names, phone number and email addresses
- Volunteer names, addresses, phone number and email
- Employee data
- Service User data
- Website statistics
- Photos and videos

We process these special categories of data:

- Health information
- Criminal conviction and offences data

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To receive news and updates about Forget Me Notes work, projects and events
- To become a volunteer with the project
- To receive support from the project
- To carry out the administration of the project

When you use our website, such as filling in one of our online forms:

We will explain the purpose of collecting your personal information and how we will use it. We will not use the personal information collected on this website (e.g. when you submit a volunteer

enquiry form) for any purpose other than dealing with the service or information you have requested.

When you browse our website:

The Forget Me Notes website is hosted by Squarespace. They collect the following personal data when you visit our website:

- Information about your browser, network and device
- Web pages you visited prior to coming to our website
- Web pages you view while on our website
- Your IP address

Squarespace needs the data to run our website, and to protect and improve its platform and services. Squarespace analyses the data in a depersonalised form.

Our website also uses Cookies to gather usage data as you browse our site (Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual). You can view the Cookies used by clicking here: *The cookies Squarespace uses* There are different types of Cookies: *These functional and required cookies are always used* and *These analytics and performance cookies*

When you sign up to our volunteer newsletter, general newsletter or choir email list:

- You will be asked to give explicit consent to receiving e-newsletters from us, or we will have legitimate interests in contacting you about our events and news
- You will always have the option to opt out at any time from mailings

When you access our social media channels, including Twitter, YouTube, and Facebook:

- We only receive personal information that you share with us voluntarily and that is compatible with your own privacy settings
- We do not share names in stories on social media, stories are anonymised

When you become a volunteer or when you seek our services for yourself or a member of your family:

• We will ask for the minimum amount of data and use it for the purposes of your volunteering or support services contract

How we store your personal information

Your information is securely stored in password protected cloud storage, password protected mobile phones/laptops and locked physical storage.

How long we keep your information

We keep data for the following period of time after involvement with Forget Me Notes ceases:

Members - one year; Volunteers, Service Users and Employees - six years; Donors data - seven years. Electronic and paper files will be clearly marked with the expiry date and will be retained and destroyed in strict accordance when the appropriate date is reached. We will dispose of your information by secure deletion from hard drives, mobile devices and the Cloud. We will shred or burn paper records.

Who has access to your information

Any details you give us will be held in accordance with the General Data Protection Regulations and subsequent legislation. We'll never share your personal information with others without your explicit permission. We may share anonymised personal information about you with our funders and internally within the Forget The Notes Project to develop and support our work.

We may transfer your personal information to a third party as part of any charity restructuring or re-organisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation e.g in court proceedings or in matters relating to the care and protection of vulnerable groups. However, we will take steps to ensure that your privacy rights continue to be protected.

What lawful basis do we have for processing your information

We collect personal information from you where we have a valid legal basis for doing so. We will make our purposes clear to you at the time of collecting personal information from you. We use the following lawful bases for collecting and storing your personal data:

- Consent For the purposes of promotional and marketing activities, we rely on your consent to process your personal information including photos. This means you have given us your explicit consent for this specific purpose. We will communicate this in a clear and transparent manner when collecting information from you.
- Contract We rely on contract as a lawful basis for processing when we need the personal information to provide a contracted service with/for you.

Special Categories

With Contract as the lawful basis we also operate a separate condition of Explicit Consent for processing special categories of data such as health, race, ethnicity, religion or criminal conviction. We process these in order to provide you with support services or to recruit you as a volunteer.

You can find out more about legal bases for processing on the Information Commissioner's Office website <u>here</u>

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information. *Your right to rectification* - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. *Your right to erasure* - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at <u>admin@forgetmenotes.org.uk</u> if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Name: Alan Midwinter Address: 3 Allison Place, Kirkliston, EH29 9BH Phone Number: 07588 894587 E-mail: <u>admin@forgetmenotes.org.uk</u>

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office Wycliffe House Water Lane, Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

This policy will be reviewed in twelve months' time.

Last Updated April 2022