

# PRIVACY POLICY

## 1. Introduction

People against Poverty and the people we help are dependent on the generosity of supporters. We cannot carry out this vital work without collecting and processing data about you, and we are therefore committed to protect any personal information we obtain about you, whether you are visiting our website or are actually a financial supporter, volunteer or other. The Privacy Policy shows how we obtain, use and protect personal information that you may provide to us, whether email, letters, phone/text or online.

The policy will explain the following: How we will use any information you give us or use to contact us

- When we may use your details to make contact with you
- Whether we will disclose your details to anyone else
- Data storage, retention periods and disposal
- Your choices regarding information you may provide to us.

We are legally obliged to use your information in line with the law concerning the protection of personal information included the in EU General Data Protection Regulations 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

We have devised this policy in accordance with the Data Protection Principles laid down by the EU General Data Protection Regulations 2018. In summary, these state that personal data shall:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for that purpose.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept safe from unauthorised access, accidental loss or destruction.

Not be transferred to a country outside the European Economic Area unless that country has equivalent levels of protection for personal data.



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### 2. How your information will be used

When you contact People against Poverty (and/or Business against Poverty, the business arm of the registered charity) to make a donation, sign for membership, support any project activity or sign up to any online content such as newsletters, events, appeals, or you telephone, email, write or text or engage with People against Poverty/Business against Poverty via social media channels and networking events, we will receive and retain personal information about you.

This can consist of information such as;

- Your name
- Email address
- Postal address
- Telephone or mobile number
- Bank account details to process donations and whether or not you are a taxpayer so that we are able to claim gift aid.

By submitting this information, you enable us to raise the funds and provide you with the service, information and activity you select.

We never usually collect sensitive personal data e.g. health (unless of course you will be applying to run a marathon for us). We will provide clear notices on applications for events so that it is clear what information we may need and why we need it.

People/Business against Poverty may use publicly available information such as newspaper or other media coverage, open postings on social media sites as twitter, LinkedIn and data from Companies House.

2. If you enter your contact details onto one of our website online forms, we will only use this information to contact you for the purpose the form was created.

At that time, we may invite you to subscribe to our newsletter and occasional email bulletins. Any invitation will be clear and require your explicit consent.

Subscribing will allow us to retain contact information for the following purposes;

- For internal record keeping
- To fulfil membership, you may have entered into
- To contact you about any content
- To invite you to participate in events or surveys



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- For marketing purposes i.e., newsletters
- To provide you with updates about our activities
- To personalise communications from ourselves to you

### 3. Disclosure

Sharing of information: We will only use your information for the purposes for which it was obtained. *We will not under any circumstance* share or sell your personal data with any third party for marketing purposes and you will not receive any offers from other companies or organisations of giving your details to us.

Marketing purposes: We will only contact you for marketing purposes where you have explicitly given consent to do so. This information of consent may be provided through online or paper form or face-to-face communications. See 6 below for updating your communication preferences including opting out of future marketing communications.

We will comply with legal requests where disclosure is required or permitted by law (e.g. government bodies for tax purposes or bodies for the prevention/detection of crime, subject to requests in writing from the relevant bodies).

Misuse of the People against Poverty website: Should any offensive, defamatory or inappropriate content be posted on our website and we believe that you may be in breach of any of the Laws of England and Wales we may use your personal information to inform the relevant parties e.g. employer, internet provider or law enforcement agencies to stop such behavior.

### 4. Data security and data storage

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and volunteers who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



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Information and records relating to service users will be stored securely and will only be accessible to authorised staff:

**Database** that contains, all personal information i.e. address, telephone number, email:

Val Huxley, CEO.  
Alistair Steadman, Finance Manager.  
Jill Neighbour, Office Administrator.  
The occasional fully vetted volunteer.

**Finance System** banking information

Val Huxley, CEO.  
Alistair Steadman, Finance Manager

### 5. Retention of personal data.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our donors (including Contact, Identity, Financial and Transaction Data) for six years after they cease being donors for tax purposes.

### 6. Data access and accuracy

All data subjects have the right to access the information People against Poverty holds about them, and bear responsibility for letting us know when personal information changes, so that the data we hold is accurate and up to date. We will also take reasonable steps on our part to check whether there have been any changes to personal data.



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In addition, People against Poverty will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Those authorised to process personal information understand that they are contractually responsible for following good data protection practice
- Those authorised to process personal information are appropriately trained to do so
- Those authorised to process personal information are appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it holds, manages and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

### **7. Updating, correcting or deleting personal information:**

Accuracy of information is important to us and a requirement under the EU General Data Protection Regulations 2018. We will ensure that we are able to communicate with you in ways that you are happy with and to provide you with information that is of interest to you.

If you wish to change how we communicate with you or update the information we hold please contact us:



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- Email: [info@peopleagainstopoverty.com](mailto:info@peopleagainstopoverty.com)
- Call us on 01225 541269 (Mon-Thur 9am – 5pm)
- Or write to us at, People against Poverty, Office 2, 11a Church Street, Melksham, Wiltshire. SN12 6LS

You may want to opt out of marketing emails at any time and you will be able to do so by clicking the appropriate link embedded within the email.

Under the EU General Data Protection Regulations 2018, you have a right to;

- Request a copy of the personal information we hold about you,
- The deletion of some or all of this data,
- And the right to be forgotten.

In order to comply with this request, we will require proof of identity with 2 pieces of approved identification. We aim to respond to all legitimate requests within one-month receipt. On some occasions, where we may be handling a number of requests, it may take us longer. In this case, we will keep you updated.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the EU General Data Protection Regulations 2018.

In case of any queries or questions in relation to this policy, please contact the People against Poverty Data Protection Officer:

Valerie Huxley, CEO  
People against Poverty,  
Office 2, 11a Church Street, Melksham, Wiltshire. SN12 6LS



## PRIVACY POLICY

### Glossary of Terms

EU General Data Protection Regulations 2018 - EU legislation that provides a framework for responsible behavior by those using personal information.

**Data Protection Officer** – The person(s) responsible for ensuring that People against Poverty follows its data protection policy and complies with the EU General Data Protection Regulations 2018.

**Individual/Service User** – The person whose personal information is being held or processed by People against Poverty for example: a client, an employee, or supporter.

**Processing** – means collecting, amending, handling, storing or disclosing personal information.

**Personal Information** – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within People and Business against Poverty

**Sensitive data** – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings