

Reviewed: 10/12/2020

Approved by the Board of Trustees on: 31/12/2020

Next review due: 30/06/2022

Good Vibrations' privacy and data protection policy



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Privacy statement

Good Vibrations is committed to safeguarding your personal information. This policy explains how we hold and use personal information and your rights in relation to it. To read our additional website privacy notice, visit: good-vibrations.org.uk/privacy-policy.

This policy adheres to [the 2018 General Data Protection Regulation](#).

How is my personal information collected?

We collect personal information in the following ways:

- Directly from you, e.g. by you: filling in paper or online forms (e.g. to sign up to our Keep in Touch programme, register to receive play-through invites, donate to us, or to give feedback); or communicating with us by email, phone, or letter; or completing a survey with us.
- Indirectly via third parties, e.g.: information we receive from delivery partners (e.g. lists of names of people interested in courses, their views on impacts we had with service-users). Sometimes they may ask for your consent to share this data with us (e.g. if we would like to use your personal information or photos in testimonials, annual reports, or on our website).
- We may also receive information from analytics providers, and contact, financial and transaction information from technical, payment and delivery providers.
- Depending on your settings and the relevant policies and terms of service, you might give us permission to access information about you from social media.
- When you visit our website, we automatically collect some technical information from your computer or mobile device (e.g. cookies, IP address, time zone, and data about your visit to the website). Visit good-vibrations.org.uk/privacy-policy to learn more.

We do not collect all the personal information above about everyone. This is a list of all the ways in which we may collect data from contacts, participants and team members. Please note that Good Vibrations has additionally developed a set of internal procedures, which corresponds to this policy, which sets out how we collect, store and delete data in relation to contacts, participants and team members in different contexts.

We will try to notify you when we receive personal information about you from other sources and tell you how and why we intend to use that personal information.

What personal information will Good Vibrations collect about me?

We collect, store and use the following kinds of personal information:

- Identity data e.g. your name
- Information about your support needs
- Photographs, video and/or audio recordings
- Contact data such e.g. your address, email and phone number
- Financial and transaction data e.g. payment details and gift aid information
- Technical data such e.g. your IP address
- Communication preferences
- Any other information you provide us with as detailed above.

How and why will Good Vibrations use my personal information?

We will use your personal data for purposes specified in this policy.

If you are a team member, we may use your personal data:

- For administration purposes, e.g. to contact you in relation to renewing your DBS Clearance, or to process payments to you
- To report to stakeholders on the reach of our services and impacts they have made on the organisation and team
- To provide you with information or support, e.g. about project logistics, organisational developments, policies, and to invite you to be part of meetings, training events etc.
- To communicate with you in general and to manage relationships with our stakeholders
- To audit and administer our accounts
- To satisfy legal obligations, and for the prevention of fraud or misuse of services
- For the establishment, defence, or enforcement of legal claims

If you are a participant, we may use your personal data:

- For admin purposes, e.g. to contact you in relation to a course you signed up for
- To report to stakeholders on the reach of our services and impacts they have made
- To provide you with information or support, e.g. to administer bursaries
- To contact you about a query you made via the website
- To help us review, develop, improve services we offer and how we communicate them
- To occasionally consult with you or carry out market research
- To satisfy legal obligations, and for the prevention of fraud or misuse of services
- For the establishment, defence, or enforcement of legal claims

If you are a contact of Good Vibrations, we may use your personal data:

- For admin purposes, e.g. to check the contact details we hold for you are up to date
- To provide you with information or support, e.g. to tell you about play-throughs
- To contact you about a query you made via the website, or info you want us to share
- To process donations and payments
- To help us review, develop, improve services we offer and how we communicate them
- To communicate with you in general and to manage relationships with our stakeholders
- To audit and administer our accounts
- To satisfy legal obligations, and for the prevention of fraud or misuse of services
- For the establishment, defence, or enforcement of legal claims

If we propose using your personal data for other uses we will ensure that we notify you first. You can withhold or withdraw your consent for your data use other than as listed above.

When and how will Good Vibrations contact me?

We may contact you for a number of reasons using the contact details you have provided. The basis on which we do so differs depending on the purpose of the communication, and specifically whether it is a marketing communication or not.

Marketing communications: We may use your contact details to inform you about our work and campaigns we think may be of interest. Where we do so by e-newsletter we will obtain your consent to do so, which can be withdrawn. Where we do so by post or email, we are doing so on the basis of our legitimate interests, unless you opt-out. We will endeavour to remove your contact details from our records immediately if you opt out. Usually, the types of marketing communications we send are:

- Invitations to play-throughs or events
- Post-project progression and support
- Updates about our work
- Campaigns and fundraising appeals

You control how we use your personal information for these purposes, and can update your preferences at any time. Please contact us if you would like to do so.

Administrative and other communications: We will communicate with you using the contact details you have provided for essential administrative and other non-marketing purposes (e.g. to respond to queries, administer a donation, provide info you request, contact you about an event you are attending, or for research purposes). We may still need to communicate with you for these purposes even where you have opted-out of receiving marketing communications from us.

Will Good Vibrations share my personal information with anyone else?

Generally, we will only use your personal information within Good Vibrations and will share with third parties, such as funders and delivery partners, to the extent required to achieve the purposes set out in this policy. We require these third parties to respect and safeguard your personal information and to act only in accordance with our instructions. Those third parties may include:

- Funders
- Consultants
- Project host organisations
- Suppliers for the performance of a contract with them, e.g. website hosting
- Insurers and professional service providers, e.g. accountants
- Financial companies that process donations for us, e.g. Virgin Money Giving
- Regulatory authorities, e.g. HMRC

We reserve the right to disclose your information to third parties for their own purposes in some cases, e.g. if we buy part of another charity, or to protect the rights of the charity, its personnel and users.

Our internal *Privacy and data protection procedures* set out who these third parties above are, the contexts in which we will share personal information with them, and the procedures we will follow in relation to these situations.

Protecting your personal information

We take appropriate and proportionate measures to keep your personal information secure and to prevent the loss, destruction or misuse of it, e.g. information is stored on a password protected, encrypted shared drive, which can only be accessed by authorised personnel. Although we do our best

to protect it, the transmission of information over the internet is never completely secure, so we cannot guarantee the security of personal information transmitted over the internet.

Generally, the personal information we collect is stored at a destination within the UK or European Union. We use suppliers to process personal information on our behalf and so personal information may therefore be transferred, stored, or accessed outside the UK or EU. In these cases we take all steps reasonably necessary to ensure that appropriate safeguards are in place, e.g. by using well-respected platforms such as Google Analytics and Wordpress.

When we collect information from under-16 year olds we will always have in place appropriate safeguards and any necessary consent from the participants themselves. We will also seek consent from our delivery partner organisations supporting them or from a parent or guardian.

How long will Good Vibrations keep my personal information?

We will make all necessary endeavours to hold your personal information only for as long as is necessary for the purpose(s) for which it is being held, and to satisfy any legal, accounting or reporting requirements. This length of time may vary depending on those purposes.

We keep personal information about participants for as long as is required by the funder of the project on which they were participants. This is stipulated in our funding contracts with them, and is sometimes up to seven years so that they can carry out audits of a sample of the recipients of their grants. Unless otherwise directed by the participant, we will keep personal information about people signing up to the Keep in Touch programme for 10 years after they signed up.

We keep personal information about team members for five full financial years after the end of the financial year in which their work or volunteering with us ended. This is so that should we need to refer to any of this information in relation to HMRC audits, or grievances we are able to do so.

Contacts - in general terms, we keep contact information for five years following the last contact or engagement for marketing/fundraising purposes.

Our legal basis for collecting and using your personal information

According to the General Data Protection Regulation, there are six ways in which an organisation can justify holding someone's data. These are:

1. If you consented to the processing of your personal data for one or more specific purposes
2. If the data controller or others have a legitimate interest in the collection and use - the law allows personal information to be collected and used if it is necessary for a legitimate interest
3. If processing your data is necessary for the performance of a contract to which you are party or are about to enter
4. If processing your data is necessary to comply with a legal obligation to which we are subject
5. If processing your data is necessary to protect your vital interests/those of another person
6. If processing your data is necessary to carry out a task in the public interest or in the exercise of official authority vested in us

If a situation arises where it is not practical to ask for consent we may rely on this legal basis. We consider and balance any potential impact on you and your rights when relying on this ground. However, where these situations relate to marketing or fundraising, you can contact us to change your preferences.

Where we rely on legitimate interests, these might be our own interests or those of a partner organisation. Ultimately they will relate to the running of a registered charity and business in pursuit of our charitable objectives. They include the following:

- Governance, delivery of our purposes, statutory reporting and other regulatory compliance
- Administrative management, responding to enquires, providing information, due diligence, events management, and employment and recruitment requirements
- Fundraising, marketing and campaigning, including in some cases sending direct marketing by post and making marketing calls
- Providing our services, including your interests, such as when you have requested information or services from us

Your privacy rights

Although these rights only apply in limited circumstances, you have the right to:

- Ask what personal data we hold about you and to request a copy
- Withdraw consent where we are relying on your consent to use your personal information
- Object to us using your personal data when we are relying on the legal basis of our legitimate interests and using it to send direct marketing

And/or to ask us to:

- Delete your personal information from our records, or anonymise it (in some cases) although we may need to retain limited information to ensure we do not re-contact you
- Restrict use of your information if there is disagreement about its accuracy or legitimate usage
- Update our records concerning you if you believe they are inaccurate
- Check the information we hold about you if you are unsure your records are accurate
- Transfer your data to you or another provider in a usable format where we are processing your information using automated means on the basis of consent or to perform a contract

For further Information Commissioner guidance, visit ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights

To exercise these rights, contact us with an explanation of the rights you wish to exercise. We are likely to ask for proof of ID or further information as our initial response to. Once we are satisfied with your identity, and that the right applies, we will have 30 days to comply with your request.

Internal data protection procedures

Good Vibrations has an additional set of detailed internal procedures for ensuring it adheres to this policy. These procedures cover work areas such as: recruitment, paperwork, media consent, accreditations, the Keep in Touch programme, providing information over the 'phone and online, shared drive, emails, website, newsletters, handling financial information, HR and data deletion.

Contact us

If you have questions or concerns about this policy please contact Good Vibrations' Executive Director on info@good-vibrations.org.uk or 07535 145 797.

You are entitled to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data privacy - www.ico.org.uk/global/contact-us - however, we are always grateful for the opportunity to resolve your concerns before you feel the need to speak to the ICO.