

# PRIVACY



# POLICY

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## Protecting your privacy

At Daniel's Den we want you to feel confident in knowing we keep all your personal information safe and secure. We're committed to protecting your privacy, which is why we made this policy – to explain how we may collect and use your personal information.

## Why do we collect information?

It's simple. We collect information to help us deliver and continually improve the service we offer. That means use any of our services or interact with us, we may collect personal information about you.

Daniel's Den is committed to protecting your personal data and handling it responsibly. This policy covers the personal data that Daniel's Den collects whenever you interact with us including when you attend our events and when you correspond with us (such as by email or over the phone). It also covers personal data that we may receive from third parties.

Our procedures covering the storage and disclosure of your information are designed to comply with the Data Protection Act 1998 and the General Data Protection Regulation (GDPR).

## Our Privacy Principles

Daniel's Den is committed to safeguarding the privacy of your information. By 'your information' we mean any information about you that you or third parties provide to us.

- We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so.
- We will be transparent in our dealings with you and will tell you about how we will collect and use your information.
- If we have collected your information for a particular purpose, we will not use it for anything else unless you have been informed and, where relevant, your permission obtained.
- We will not ask for more information than we need for the purposes for which we are collecting it.
- We will continue to review and assess the quality of our information.
- We will implement and adhere to information retention policies relating to your information and will ensure that your information is securely disposed of at the end of the appropriate retention period.
- We will observe the rights granted to you under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are promptly and transparently dealt with.
- We will train our volunteers and staff on their privacy obligations.
- We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it's held.

## Data we collect

We collect personal data from your interactions with us, such as when you engage with our website and social media pages, attend a Session or Activity, or when you email or phone us.

The personal data we collect from you includes:

What information may we collect?	Why do we collect it?
Your name, age and gender	<ul style="list-style-type: none"><li>• To help us verify your identity and personalise our service</li><li>• To provide essential fraud prevention and detection</li></ul>
Your home address	<ul style="list-style-type: none"><li>• To enable us to verify that we are reaching the relevant community for our Funders</li><li>• To provide access to local services</li></ul>

**Daniel's Den Privacy Policy** Last modified: 12 April 2023

Your email address	<ul style="list-style-type: none"> <li>To keep you informed of any changes to our services</li> <li>To keep you up-to-date on new events (if you have subscribed to this)</li> <li>To record your emails and keep track of any issues or concerns you may have. This helps us to continually improve our services</li> <li>To ensure you don't receive any marketing emails if you have unsubscribed from this service</li> </ul>
Your telephone number (including home and/or mobile numbers)	<ul style="list-style-type: none"> <li>To get in touch with you if there is a change to our services (eg a session has to be cancelled at short notice)</li> <li>If there's a query regarding a service we provide</li> </ul>
	<ul style="list-style-type: none"> <li>To send you SMS/WhatsApp communications about our services</li> <li>To ensure you don't receive SMS marketing messages if you have unsubscribed from this service</li> </ul>
Sensitive classes of information that may include racial or ethnic origin; religious or other beliefs.	<ul style="list-style-type: none"> <li>To ensure that we abide by the Equality Act 2010 which legally protects people from discrimination in the workplace and in wider society</li> <li>To provide anonymised information to our funders and on our Annual Report</li> </ul>
Physical or mental health details	<ul style="list-style-type: none"> <li>To provide an inclusive service to all who access our services</li> <li>To provide emergency First Aid if necessary or provide accurate information to Emergency Services</li> <li>To assist with referrals to local services if requested by you</li> </ul>
Your contact history (including written notes on telephone calls and feedback)	<ul style="list-style-type: none"> <li>To enable us to provide our service, we keep a record of all attendances at our sessions/activities</li> <li>To ensure we always provide the best customer service and for training purposes</li> <li>To enable us to fully investigate any concerns you raise</li> <li>To log any questions or issues and respond to you</li> <li>To keep details up-to-date if a service is provided to us</li> </ul>
Your social media accounts (when you link your Twitter or Facebook accounts to us)	<ul style="list-style-type: none"> <li>To keep you informed about all our services and activities through the power of social media</li> </ul>

Hyperlinks	<ul style="list-style-type: none"><li>• The use of hyperlinks to keep track of whether these links have been followed. We use this information to improve the quality of our services.</li></ul>
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This information is used for the provision of the Daniel's Den and for:

- Auditing, research and analysis in order to maintain, protect and improve our services.
- Ensuring the technical functioning of our service.
- Protecting the rights or property of Daniel's Den.

## How we process data

This section explains the reasons why we process your personal data and our legal basis for doing so.

- Consent – If you've opted-in to receive information about our services, then we'll provide this information to you by email, text or phone.
- Legitimate interests – We process your personal data when necessary to pursue our legitimate interests in the following:
  - Monitoring, improving and protecting our content and services
  - Tailoring our website and communications for you.
  - Sending you some types of direct marketing, including by email and post.
  - Responding to your comments or complaints.
  - Processing volunteer/job applications

Wherever we rely on your consent to process personal data, you have a right to withdraw that consent.

We will also use anonymised data (containing no user-identifiable information) for:

- Producing statistical analyses to help us improve our service and to support families.
- Producing marketing materials.
- Updating our funding providers

## Disclosure of your information

We will share your personal data with the following recipients, however it is protected and held securely and only accessible by authorised staff who have a controlled login.

- **BeaconCRM.org** – Provider of our database system [www.beaconcrm.org](http://www.beaconcrm.org) is a site operated by Beacon Apps Ltd ("We"). Registered in England and Wales under company number 11097096 and have a registered office at 11 Kingfisher Business Park, Arthur Street, Redditch, England, B98 8LG. Main trading address is 113 Shoreditch High Street, London, E1 6JN.
- **Microsoft OneDrive for Business** – Microsoft Cloud Storage for Office365. Servers are located within Durham, England.
- **MailChimp** – Used to send out Newsletters

Servers are located in the United States. However, because MailChimp certifies to the Privacy Shield framework, they can lawfully receive EU data. Information given for those who have subscribed to receive our newsletter or become a Friend of Daniel's Den.

- **Third Parties** - Information will also be shared with third parties if there is a legal requirement to do so or if there is a risk of serious harm or threat to life.

## Information security

We take appropriate security measures to protect against unauthorised access to or unauthorised amendment, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorised access to systems where we store personal data.

## Data retention

We hold all personal data for a maximum of 6 years. This is the default standard retention period for HMRC records and all information at Daniel's Den is held for the same period. At Daniel's Den this is defined as 6 years after the last contact or the end of the Daniel's Den 'Working Year' – 31 August. After this time has passed, all copies of the data will be destroyed.

## Data Destruction

Paper documentation will be shredded in the presence of a member of Daniel's Den. If not shredded immediately, all confidential records will be held in a secured plastic bag, labelled as confidential and locked away.

At the same time any electronic copies will be deleted from our database, however it will be held in the back-up system for 28 days before it is finally permanently deleted.

## Your rights

The General Data Protection Regulation (GDPR) outlines several rights.

You have the right to:

- Ask for access to, or rectification or erasure of your data.
- Restrict processing (pending correction or deletion).
- Object to communications or direct marketing.
- Lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Questions and complaints

Daniel's Den regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or Daniel's Den treatment of personal information by emailing or writing to us at:

**Email:**

[info@danielsden.org.uk](mailto:info@danielsden.org.uk)

**Postal Address:**

**Daniel's Den, St. Andrew's Church, 956 Harrow Road, Sudbury HA0 2QA**

When we receive formal written complaints at this address, it is Daniel's Den policy to contact the complainant regarding his or her concerns.

## **Changes to this Privacy Policy**

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Privacy Policy changes on our website and, if the changes are significant, we will provide a more prominent notice via social media or within our sessions. Each version of this Privacy Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review.