

21. Privacy Policy

Introduction

This privacy policy explains how we use personal information we collect about you when you use our website and our wider services.

The law on data protection changed in May 2018, when the new EU-wide General Data Protection Regulation (GDPR) came into force. This new regulation gives you greater control over how information about you is stored and used by organisations like ICN. To ensure we are working in line with the regulations, this policy has been developed.

If you have any queries about our privacy policy please email: info@icn.org.uk or call us on 01202 589395.

Who are we?

ICN is a charity working to care for asylum seekers and refugees in our community, showing them compassion and understanding, to enable them to rebuild their lives and work towards independence and integration.

ICN is a charity registered in England and Wales (charity number:1099400). Our registered office is at: 200 Holdenhurst Road, Bournemouth, Dorset BH8 8AS.

For the purposes of this policy, 'us', 'we' and 'our' refer to ICN.

What is this policy about?

ICN is committed to protecting your privacy and the personal information you provide us with. In line with our values, we want to treat you - and your personal information - with respect and dignity. It is important to us that you have confidence in us as an organisation, and that you trust us to look after your information. This policy explains how we collect, use and store your personal information, and also explains the rights you have under the 2018 regulations.

At ICN, we have relationships with different people: clients; students and young people seeking asylum; supporters; volunteers and staff. For each type of relationship, we collect different personal information and this data might be used and stored in different ways.

Your rights

Your rights Under GDPR, you have eight (8) specific rights when it comes to your personal information:

1. **The right to be informed** - meaning you should be given clear information about what personal information we keep, why we keep it and how it is used and stored.
2. **The right of access** - meaning you can ask us for a copy of all the personal information we hold about you and you can ask us questions to make sure that we are processing your information legally.
3. **The right to rectification** - meaning that if the personal information we have is wrong or incomplete, you can tell us so that we only keep accurate information that you have chosen to share with us.
4. **The right to erasure** - meaning that you can ask us to erase all your personal information. This is sometimes known as 'the right to be forgotten'. There are some occasions when we may have a legal obligation or legitimate interest to keep certain information about you, even if you no longer want to be on our records, for example in terms of processing financial information and data collected with regard to immigration applications.
5. **The right to restrict processing** - meaning that you can ask us to keep your information but only use it for certain purposes, for example you may want to only receive certain types of information from us.
6. **The right to data portability** - meaning that you can ask for your data to be transferred to another system. This is not something that is currently relevant to our general work at ICN, the exception being immigration matters, where we can pass files to other advisors at your request.
7. **The right to object** - meaning that if you are unhappy with the way we have processed your data, for example if we keep writing to you when you have asked us not to, you can tell us and we must respond.
8. **Rights in relation to automated decision making and profiling** - meaning that we need to tell you if we use any systems which automatically use your personal information without human involvement. There is more information about this and all the other rights on the Information Commissioners Office website.

What information do we collect?

We collect personal information, or data, each time you interact with us. For example when you access our services, when you make a donation, request information, apply for a job or volunteer opportunity, sign up for an event, provide feedback or otherwise provide your personal details.

We collect information from third parties, for example referral agencies, where you have given your consent. You may wish to check the privacy policies of these organisations to find out more information on how they will process your data.

When you visit our website, we collect non-personal data such as details of pages visited and time and location data. Website usage information is collected using cookies (see the section on cookies below).

What do we do with your information?

Clients/students – we may use the personal information we collect from you (and/or the organisation who referred you) to:

- arrange an initial contact meeting to understand your situation and find out whether we are able to offer you support
- provide you with any services we have agreed with you
- share information with other organisations, for example with your original referrer, or with legal or medical services.

Our use of your information is always subject to our confidentiality policy.

Supporters – we may use the personal data we collect from you to:

- keep you up to date with news and stories about our work
- process any donations you give to us including claiming gift aid on your donations if authorised by you to do so
- thank you for your donations and invite you to continue to support us financially and non-financially, for example through volunteering or praying
- provide you with any information you have requested
- keep a record of your relationship with us
- analyse the personal information we collect about you and use publicly available information to aid our understanding of our supporters to help provide the right information at the right time to the right supporters

Volunteers and Job Applicants - we may use the personal information we collect from you to:

- process and consider your application for a role at ICN. Your information will only be shared with our staff involved in the recruitment process
- share specific and appropriate elements of your personal data, for example, your contact details, with other staff team members that you will be working with should your application be successful

- DBS (Disclosure and Barring Service) checks are an essential requirement for our work with young people and vulnerable adults at risk of harm. When DBS clearance is achieved there will be data held electronically within the Disclosure and Barring Service. Please refer to the Disclosure and Barring Service GDPR policy for their use and retention of your data.

Employees – we may use the personal information we collect from you to:

- fulfil our contractual obligations to you, such as paying you
- ensure we are treating you as we've committed to, for example under our sickness absence policy
- provide references at your request should you move on

Sharing your information

Sometimes we may need to share your information. We may have to share information if it is required by a law enforcement agency or by a regulatory body, for example the HMRC for processing gift aid donations.

We do not share your information with any organisations for their marketing purposes. We may use other organisations to carry out tasks on our behalf, including processing donations, and sending emails (such as using Mailchimp to send our newsletters). We will only provide these organisations with the information needed to deliver these services, and they are not permitted to use or store your data for any other purpose.

We may share your information internally, within the ICN team, for the purpose of safeguarding, or, for example, if a staff member needs to query something with you.

Where and how do we store your personal information?

We take appropriate steps to ensure your personal information is managed securely. We store and process most of our information using secured servers. Internally, this is accessed only by appropriate staff and volunteers who are trained suitably. We restrict access to certain computer drives and files, for example information relating to salaries.

Some of your information may be stored in hard copy (on paper), for example if you have given us a photocopy of any personal documentation, or signed copies of formal paperwork. We do our best to keep paper copies to a minimum and we store hard copies of these documents in locked filing cabinets with restricted access.

While we take appropriate steps to ensure that information is secure, we cannot guarantee that transmission of information over the internet is 100% secure and therefore you submit data at your own risk. Data in cloud based systems may be processed outside of the European Economic Area (EEA). By submitting your personal data, you agree to this transfer, storing and processing of your information.

Cookies

Cookies are text files that are placed on your computer by websites that you visit. Most browsers allow you to turn off the use of cookies function, should you wish to. Cookies may be used to collect information about your visit to our website, for example the pages that you visit; the time and date of your visit.

We may collect and use this data for the following reasons:

- To understand the interests and needs of those who visit our website
- To estimate our audience size and patterns
- To support the processing of forms, applications or requests you send to us
- To help us improve and update our website

ICN uses third party suppliers such as Facebook, Mailchimp, etc, and they in turn may use cookies. We do not control these, and we would advise you to check with these third parties for information about their cookies and how to manage them. Some of these third parties may be located outside of the UK and the European Union, and therefore they may not fall under the jurisdiction of UK courts. If this is a concern to you, you can change your cookie settings and you can find out more about this from the Information Commissioner's Office (ICO) <https://ico.org.uk/>.

How long do we keep your information?

How long information is kept for is sometimes called 'data retention'. We will keep your personal information only for as long as we consider it necessary. We have to take into account legal obligations; for example we are obliged to keep details of anyone making a financial donation for 7 years after the gift (and share those details to the HMRC if this is gift aided), accounting and tax considerations and also consider what is reasonable for the activity in question. In respect of immigration applications, we are obliged to retain the information for 6 years. (This supersedes the 'Right to erasure' as detailed above.)

Our need to use your personal information will be reassessed on a regular basis and we will dispose of Personal Data which we no longer require.

If you have any questions about this, please contact us in writing using the contact details at the bottom of this Privacy Policy.

Updating your details and preferences with us

Please keep your details up to date with us, for example if you change address or telephone number. When you provide us with personal information, we may use the Royal

Mail's Postcode Finder or other available sources to confirm this, for example if we are unsure of what you have written on a form. We do not use these sources to access data that you have chosen not to provide to us.

You can change your preferences for which communications you receive from us, and how we contact you, by getting in touch with us at any time. Please see 'How to contact us' section below.

Accessing and amending your information and preferences

At any time, you can do the following:

- ask for a copy of the personal information we hold about you
- ask us to erase or remove all your personal information
- ask us to restrict how we use your personal information
- object to our use of your personal information

Your request needs to be in writing: either on paper or an email is fine. The more detail you are able to include the better we'll be able to respond.

To do any of these, please write to us at:

By email: info@icn.org.uk

By post: ICN, 200 Holdenhurst Road, Bournemouth, Dorset BH8 8AS

If we are to provide information to you, the format may be on paper or electronically. This will depend on the quantity of information that is requested and the viability of producing it in a timely and appropriate manner.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you.

By email: info@icn.org.uk

By phone: 01202 589935

By post: ICN, 200 Holdenhurst Road, Bournemouth, Dorset BH8 8AS

Information Commissioner's office (ICO) 03031 231113