



## **PATH Yorkshire**

### **Privacy Policy (web-site)**

This Privacy Policy explains what personal data we may collect about you, how we use it, and the steps we take to ensure that it is kept secure. We also explain your rights and how to contact us.

### **Legal compliance**

Unless stated otherwise, PATH Yorkshire is the data controller in respect of all personal data collected by us on this website or otherwise. This means that we are responsible for ensuring that we do so in full compliance with the Data Protection Act 1998 (to be replaced by the General Data Protection Regulation when it comes into effect in May 2018), all other related privacy laws and any codes of practice issued by the Information Commissioner. Our intention is to be compliant, user friendly and to ensure our supporters only receive information they are interested in.

**BY USING THIS WEBSITE AND/OR GIVING PERSONAL DATA TO US YOU INDICATE THAT YOU CONSENT TO US USING YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY POLICY**

### **Why we collect personal data?**

We collect information for various reasons:

- We collect and hold information about next of kin in case of any emergency. The information is held on computer, paper record or both.
- We collect and hold information about staff and volunteers to communicate and carry out administration, as necessary for your role.
- We collect and hold information from donors and supporters in order to make better decisions about how we raise and spend funds. As a registered charity, we rely on the people living in its local community for support – both financially and in kind. By gathering information about our community we can fundraise more efficiently and get the right information to the right people based on what they want to see.

### **The personal data we collect and its sources**

We may obtain personal data face to face, electronically, on paper (such as any form you complete) or verbally (such as during any telephone conversations we have with you).

The type and quantity of personal data we collect and how we use it depends on why you are providing it.

### **The information may come to us:**

- directly from you such as when you make a donation; when you sign up to an event or activity or when you sign up as a volunteer.
- from social media sites or apps. If your settings and preferences allow, we may obtain information (including personal data) from social media services such as Facebook and Twitter.

### **Information about other people**

If you provide personal data to us relating to any person other than yourself, you must ensure before you do so that they understand how their personal data will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf.

### **The personal data we collect**

The type and quantity of personal data we collect and how we use it depends on why you are providing it.

### **If you are using our website**

#### **IP addresses**

In order to understand how users use this website and our services, we may collect your Internet Protocol addresses (also known as IP addresses). Your IP address is a unique address that computer devices (such as PCs, tablets and smartphones) use to identify themselves and in order to communicate with other devices in the network.

### **Cookies**

We use cookies on PATH Yorkshire website to make your browsing experience more efficient and enjoyable.

Cookies are small text (.txt) files containing basic information about a particular website and user. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs.

If you would like to disable cookies, you can change your browser settings to reject cookies. However, this may negatively affect how some of our content is displayed and how our website functions.

For more information about cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org).

### **Links to other websites**

Please note this website may contain links to other websites that are not controlled by us. These links are provided for your convenience. We are only responsible for our privacy practices and our security. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit and each organisation that holds your personal data.

### **How we will use your personal data**

All personal data that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection law and this Privacy Policy. We will primarily use the personal data for the following purposes:

- charity fundraising. To administer any donations (including taking payments) you agree to make, including complying with Gift Aid requirements and to communicate with you in the event of a query
- personnel matters. To administer your employment or voluntary work where you become an employee or volunteer
- fraud prevention. To detect and reduce fraud and credit risk
- market research. To carry out market research so that we can improve the products and services we offer
- demographic analysis and preferencing. To create an individual profile for you (including analysing demographic and geographic information) so that we can enhance your experience and relationship with us, understand and respect your preferences and to provide information and details of relevant offers and opportunities where you have agreed to receive them. We may undertake in-house research and engage third party organisations such as fundraising agencies to help us identify people who may be able to support us with a larger gift or in other ways, using publicly available records. We may also collect information on your interests, for example board memberships, hobbies, or articles about you in the media. We use this information to tailor our communication with you and invite potential supporters to meetings, groups and events which may be of interest to you.
- charity regulation. To comply with our obligations as a charity

- website monitoring. To use IP addresses and monitor website use to identify locations, block disruptive use, record website traffic or personalise the way information is presented to you

### **Consent and lawful processing of personal data**

The legal basis for the collection and use of your personal data is that you have given your consent and/or that it is in our legitimate interests to contact you. We need to do so in order to support communities needs in the area; your rights and freedoms are not prejudiced by this.

### **Disclosing your personal data**

We do not sell personal data.

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, event administration, printing companies and mailing houses. In these circumstances, we will ensure that your personal data is properly protected and that it is only used in accordance with this Privacy Policy.

We might use third party electronic payment providers such as World Pay to administer some transactions. They have their own privacy policies and we encourage you to read them.

On very rare occasion, we may be required to disclose your details to the police, regulatory bodies or legal advisors or to comply with a court order or a legal obligation. In these circumstances we would be careful to only provide information that we are required to provide.

### **How we might contact you**

We may need to contact you for various reasons in a number of ways. If you have given consent or there is legitimate interest, we would like to contact you and/or any person whose information you provide to us with further information about PATH Yorkshire.

We will usually try to tailor the communications we send to you so that they are relevant and in line with the preference options you have chosen which form part of the personal profile we will create for you.

### **Preferences / Subscribe / Unsubscribe**

You and any other person whose personal data you have provided to us can change your/their mind about whether you wish to receive information.

You can change your preferences at any time sending an e-mail to [info@pathyorkshire.co.uk](mailto:info@pathyorkshire.co.uk) or by following the instructions with each communication you/they receive.

Please note it may take up to one month for your changes to be implemented and for communications to start or cease.

### **Data security**

We take the security of personal data seriously. We employ security technology, including firewalls, and encryption to safeguard personal data and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage.

Personal data in our databases is only accessible by appropriately trained staff and volunteers who need to access your personal data as an essential part of their role. All access is tracked through individual login credentials.

We only use third party service providers where we are satisfied that the security they provide for your personal data is at least as stringent as we use ourselves.

### **Data Protection**

We will normally keep your personal data for a minimum of what is legally required.

Everyone who has supported PATH in some way will hear from us at least once a year, unless you have opted out of communication from us. We will continue to do this until you tell us otherwise. We will always provide details in our communications of how you can opt out.

### **Use of personal data outside Europe**

If we ever need to transfer your personal data to other territories outside of the United Kingdom or the European Economic Area, we will take proper steps to ensure that it is protected in accordance with this Privacy Policy and applicable privacy laws.

### **Changes to this privacy policy**

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our security and privacy policies. If we want to make any significant changes in how we will use your personal data we will contact you directly and, if required, seek your consent.

We will ensure our website has our most up to date policy and suggest that you check this page periodically to review our latest version.

### **Updating and correcting personal data**

You may update or correct your personal data by contacting us and asking us to do change for you by sending an e-mail to [info@pathyorkshire.co.uk](mailto:info@pathyorkshire.co.uk) . Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept amendments only from the correct person.

We encourage you to promptly update your personal data if it changes. If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

### **Your rights**

You have a number of legal rights in respect of your personal data. These include:

- The right to receive a copy of the personal data that we hold about you. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within one month of receiving them.
- **withdraw consent to direct marketing.** You can exercise this right at any time and can ask us to do update your preferences. See section 'Updating and correcting your personal data' above for details.
- **withdraw consent to other processing.** Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect a new activity and does not mean that processing carried out before you withdrew your consent is unlawful.
- **rectification.** If you consider any of your personal data is inaccurate, you can correct it yourself or ask us to do it for you (see section 'Updating and correcting your personal data' above for details).
- **restriction.** In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we

hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified.

- **erasure.** Where we have no lawful basis for holding onto your personal data you may ask us to delete it.
- **portability.** In limited circumstances you may be entitled to have the personal data you have provided to us sent electronically to you for you to provide to another organisation.
- **to complain to the Information Commissioner's Office.** You can find information on how to do this at [www.ico.org.uk](http://www.ico.org.uk).