

## Protecting your privacy

This **Privacy Notice** explains the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle and keep that data safe.

The following sections will answer any questions you have but if not, please do get in touch by contact us by post, telephone or email. Contact details are shown below.

It's likely that we'll need to update this Privacy Notice from time to time. You are welcome to come back and check this at any-time or contact us by any of the means shown below.

The law on data protection sets out a number of different reasons or conditions for which an organisation may collect and process your personal data, including:

### **Consent;**

In specific situations, we can collect and process your data with your consent. This might include when you complete a form online to receive an email about ways you can support us or to receive information about Kisharon, our services or our facilities.

When collecting your personal data, we'll always make clear to you what data is necessary and for what purpose.

### **Contractual obligations;**

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you pay to attend one of our many services. Or if you give a donation and agree to Gift Aid or if you set up a regular gift by Direct Debit.

### **Legal compliance;**

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting Kisharon to law enforcement.

### **Legitimate interest;**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected when we pursue our aims and objectives as an organisation and which does not materially impact your rights, freedom or interests.

For example, we will use personal details to send regular information to our supporters about ways to help us in the future.

We also might combine the history of your interaction with us and other information about your likes and behaviour to identify trends and ensure we send relevant and timely

information about our activities, or if we develop new ways you may support us or to benefit from what we do here at Kisharon.

### **Special category data;**

"Special categories" of particularly sensitive personal data require higher levels of protection. We take extra care when collecting, storing and using this type of personal data. We aim to collect and process special category data as little as possible. Generally, we will only collect information on your health where we are legally obliged. This is to uphold our duty of care, our contractual arrangements and to ensure the safeguarding of staff, those using our services and visitor to our various locations. Other special categories of data may be revealed to us by subjects during the course of delivering our services, we do not strictly process this information but acknowledge it may on occasion be recorded. Kisharon will document all incidents of its processing of special category data in its Information Asset Register, and will be preparing a separate document itemising all of these, with reasons, having conducted assessment where required.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data (e.g. fingerprints) for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, and further conditions are met;
- Where the processing is necessary for archiving purposes, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law;
- Where there is a legal obligation.

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for "special categories" referred to above.

### **When we collect your data;**

When you email us we may collect your name, gender, date of birth, postal address, email and telephone number. For your security, we keep all data secure with appropriate

organisational and technical safeguards to keep information safe. When we interact with you we may also collect notes from our conversations with you, details of any complaints or comments you make. We might record your age for identity where the law requires this. We may use technology such as cookies to help us deliver relevant and interesting content in our communications in the future. We may profile you to find out more about you but in the least intrusive way.

We'll only ask for and use your personal data collected for the purpose stated at the point at which it is collected. If we believe your data is no longer needed for this purpose we will not process your data further.

Your image may be recorded on CCTV when you visit our premises for safety and crime prevention and detection.

We may collect your social media username, if you interact with us through those channels, to help us respond to your comments, questions and feedback.

The data privacy law allows this as part of our legitimate interest in understanding our audience.

If and when you wish to change how we use your data, you'll find details in the 'What are my rights?' section below;

#### **An overview of your data protection rights;**

- Access to the personal information we may hold about you. This is free of charge and will be supplied to you within one month of your request.
- You can withdraw consent, or object to marketing communications we send you. If we do not have a legitimate interest to continue, or once the purpose for which we hold the data has ended, we will stop sending this messages.
- You can object to our processing of your personal information for direct marketing purposes.
- You have a right to know why we are processing your data and whether we are sharing your information with any third parties.
- Should we make automated decisions about you, you can ask for these to be assessed by one of our staff.

- You have the right to request a copy of any information about you that Kisharon may hold at any time to check whether it is accurate.
- To ask for your information, please contact the Data Protection Officer at Kisharon using the details below.

Whenever you have given us your consent to use your personal data you have the right to change your mind and stop future communications. You may also Opt-out in some cases of our processing of your data where we have a Legitimate Interest.

To protect the confidentiality of your information and the interests of Kisharon, we will ask you to verify your identity before proceeding with any request for information. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to request such information.

You are free to opt out of hearing from us by any channels at any time unless we have a legal obligation to communicate with you.

We may send you relevant and personalised communications by post. We'll do this on the basis of our legitimate interest but only after certain risk assessments. You are free to opt out of receiving marketing materials from us by post at any time.

Sometimes we are required to inform you about certain changes. For example, updates to this Privacy Notice and where we have a legal obligation. These administrative messages will not include any fundraising or marketing content and do not require prior consent when sent by email. If we didn't use your personal data for these purposes, we would be unable to comply with our legal obligations.

To display the most interesting content to you on our website, we may use data we hold about your previous visits.

We may use your data to send you a survey and feedback requests to help improve the way we communicate. These messages will not include any fundraising requests or marketing and do not require prior consent when sent by email. We have a legitimate interest to do so as this helps make our product and services more relevant to you.

### **Data Retention;**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely, put beyond use or anonymised.

If you have not supported us for more than five years, you will be flagged as inactive and we'll contact you to ask whether you want us to keep your data or not. Unless you have said otherwise we may stop sending you communications altogether or reduce the frequency. We may delete or anonymise the personal data we store on you.

### **Sharing your data;**

Occasionally we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

## **Protecting your data outside the EEA;**

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such the USA.

For example, this might be required when we store data in a Cloud.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA.

and we will treat the information under the guiding principles of this Privacy Notice.

- **Stopping us from using your data in the future;**

You can stop communications from Kisharon by either:

- clicking the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails and will 'forget' your information in line with your rights unless we have a legal obligation to keep it; or
- by contacting us using the information below.

Remember, some administrative communications for current members cannot be stopped.

- **How to complain about our processing of your data;**

If you feel that your data has been handled incorrectly, or you are unhappy with the way we have dealt with your query regarding the way we use your personal data, you have the right to complain to the Information Commissioner's Office (ICO) which regulates the use of information in the UK.

You can call them on [0303 123 1113](tel:03031231113) or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

If you are based outside the UK you have the right to complain to the relevant data protection supervisory authority in your country.

If you would like to discuss any aspect of this policy or the way Kisharon processes your information please contact the Kisharon **Data Protection Officer** using the details below.

Here's how to get in touch;

By Post – By writing to us at; Head office 1st Floor 333 Edgware Rd, London NW9 6TD

By Email – You can email us at; [dataprotection@kisharon.org.uk](mailto:dataprotection@kisharon.org.uk)

By Telephone – Alternatively, please call us on 020 8203 2233