

RECLAIM

Data Protection Policy

Written by	Louise Toole - Digital Communications Officer
Approved by	Board of Trustees
Last reviewed	September 2023
Next review due	September 2024

Our contact details:

Name: Reclaim Project Limited (known as RECLAIM)

Address: Manchester Deaf Centre, Crawford House, Booth St E, Manchester M13 9GH

E-mail: Info@reclaimproject.org.uk

Web Address: <https://www.reclaim.org.uk/about-us>

The type of personal information we collect:

We currently collect and process the following information, this list is not exhaustive:

- Name
- Contact details
- Email Address
- Images
- Employee data
- Donor data
- Volunteer data
- Sensitive data

How we get the personal information and why we have it:

Most of the personal information(PI) we process is provided to us directly by you for one of the following reasons:

- Consent forms: Individuals who voluntarily share their information for specific purposes:

attend an event, subscribe to the mailing list, participate in a survey, publish PI on social media or website.

- **Contractual Obligation:** Personal data may be collected to fulfil contractual obligations with individuals. For example, collecting participant data from specific programmes.
- **Legitimate Interests:** We may have legitimate interests in collecting and processing personal data, provided that these interests are not overridden by the individual's rights and freedoms. Legitimate interests could include direct marketing: sending promotional offers and marketing communications to existing customers. Provided their interests and privacy rights are balanced and respected. For example, when a donor donates.
- **Legal Obligations:** Sometimes, data collection is necessary to comply with legal obligations, such as tax or regulatory requirements. For example, retaining employee data.
- **Vital Interests:** In certain situations, personal data may be collected to protect someone's vital interests, such as in medical emergencies.
- **Public Task:** We may collect personal data as part of our official duties or public tasks.

Direct data collection:

- We may directly collect photos or limited data of minors or young people to create an engaging and age-appropriate online experience on our website or social media platforms. While these images and data are not always submitted to us by the individuals themselves, we consider the act of capturing and using their images or personal information as a form of direct data collection. In the case of minors, we will seek explicit consent from a parent or a guardian before utilising their images and data for social media activities.

We also receive personal information indirectly, from the following sources in the following scenarios:

- **Cookies and Tracking Technologies:** Our website uses cookies and tracking technologies to gather information about users' online behaviour, preferences or interactions.
- **Social Media Data:** Organisations may collect personal data indirectly from social media platforms when users interact with the organisation's social media pages, posts, or advertisements.
- **Publicly Available Information:** Personal data that is publicly available through official websites, public records, or publications can be indirectly collected by organisations.
- **Customer Surveys or Research:** Organisations may receive personal data indirectly through customer surveys, market research, or demographic studies conducted by third-party research firms.
- **Credit Reference Agencies:** Financial institutions and businesses might use credit reference agencies to obtain credit scores and other financial information about individuals for credit assessments.
- **Data Sharing Partnerships:** Organisations may share data with partner companies or

service providers, which can indirectly result in the collection of personal data.

- Publicly Available APIs: Some organisations may use publicly available application programming interfaces (APIs) to gather data from third-party platforms or databases.

We use the information that you have given us for:

- Analytics and Improvements: We analyse indirect information to understand user behaviour and preferences, helping us improve our products, services, and website functionality.
- Marketing and Communication: We may use indirect information to send you relevant marketing communications, newsletters, or updates about our products, services, or events that may interest you.
- Personalization: We use the indirect information you have provided to personalise your user experience, such as tailoring content or recommendations based on your preferences and interests.
- Research and Development: We may use aggregated and anonymized indirect data for research and development purposes, helping us innovate and enhance our offerings.
- Compliance: We use indirect information to comply with legal and regulatory requirements and to respond to requests from government authorities or law enforcement agencies.
- Data Security: We utilise indirect information to ensure the security and integrity of our systems, protecting your data from unauthorised access or breaches.

We will never share or sell your data to third-party organisations for marketing, fundraising or campaigning purposes.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You can remove your consent at any time. You can do this by contacting info@reclaimproject.org.uk
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

How we store your personal information:

Your information is securely stored.

- We keep donor information, such as names, contact details, and donation history by generating donor reports and saving them in secure folders on the digital drive for as long as individuals continue to support our organisation. If a donor requests to be removed from our records, we will promptly delete their personal data from our donor database.
- We keep customer tickets and communications on the Eventbrite platform for a period of six months after the issue is resolved to ensure a record of the interaction. After this period, we will securely dispose of the support tickets and related personal information.
- We store images and limited data (name, age, location) of minors or young people for online purposes with the highest regard for security. Strict measures are in place to protect against unauthorised access, ensuring the confidentiality and integrity of the data. We retain this information only for the duration necessary to fulfil the intended purpose of social media engagement. Once this purpose is achieved, or upon request, we promptly delete or anonymize the data. Our practices align with privacy laws and regulations, and we prioritise the rights and privacy of minors. For any questions or concerns regarding the storage of images and personal information of minors for social media, please refer to the contact details in our privacy policy.
- For social media platforms such as facebook, instagram, twitter and linkedin we retain user account information and activity logs on the digital drive for as long as the user maintains an active account with us. If an account is inactive for more than two years, we will securely delete the account data in accordance with our data retention policy.
- For unsuccessful job applicants, we retain your application details on the digital drive for one (1) year after the application process is completed. At the end of this period, your personal information will be securely deleted from our applicant database.
- We retain anonymized and aggregated research data indefinitely for historical and statistical purposes. Individual identifiers are removed, ensuring that the data cannot be linked back to any specific individual.
- We store your email address and subscription preferences on Mailchimp platform until you choose to unsubscribe from our marketing communications. When you opt-out or if your email address is no longer in use, we will promptly remove your email address from our mailing list and suppress it to prevent any further marketing outreach.
- We retain your financial information, including account numbers and transaction records on the secure digital drive for the duration of your account with us and for a period of seven years after the account closure in accordance with banking regulations. At the end of this retention period, we will securely dispose of your financial data using data encryption and irreversible deletion.
- We retain former employee data on our digital drive for a period of three (3) years from the date of an employee's departure. This retention period is necessary to facilitate internal processes, address potential post-employment inquiries, and ensure a smooth transition for both the organisation and the former employee. At the end of the retention period, all former employee data will be promptly and securely disposed of using electronic means.
- We keep volunteer information, such as names, contact details, and volunteer history, for a period of two (2) years from the date of the last volunteer activity. This retention

period allows us to acknowledge and express gratitude for volunteer contributions and maintain a record of volunteer engagement for future reference. At the end of the activity period, all former volunteer information will be promptly and securely disposed of using electronic means.

- We keep grant application data, such as applicant names, project details, and financial information, for a period of five (5) year from the date of the grant application decision. This retention period allows us to address any post-application queries and comply with grant reporting requirements. At the end of the retention period, all form grant application data will be promptly and securely disposed of using electronic means.
- We retain job application data, such as resumes, cover letters, and applicant contact details, for a period of one (1) year from the date of the hiring decision. This period allows us to address any post-application inquiries and comply with potential legal requirements. At the end of the retention period, all form grant application data will be promptly and securely disposed of using electronic means.

We keep the following sensitive information:

A Safeguarding Spreadsheet: We maintain a safeguarding spreadsheet to record and track incidents or concerns related to the safety and well-being of individuals associated with our charity, including beneficiaries, staff, and volunteers. This spreadsheet contains sensitive personal data, such as names, contact details, incident descriptions, and any actions taken.

Data Retention: We will retain the safeguarding spreadsheet for a minimum of five (5) years from the date of the last entry or the resolution of the incident, whichever is later. This retention period allows us to fulfil our legal obligations and protect the welfare of the individuals involved. Keeping the data for this duration also allows us to track trends and patterns in safeguarding incidents to improve our policies and practices.

Data Disposal: At the end of the retention period, the safeguarding spreadsheet and any related physical or individual records will be securely deleted or shredded to ensure that the data is no longer accessible. Electronic copies will be permanently removed from our systems, and physical copies will be disposed of confidentially.

Data Security: During the retention period, access to the safeguarding spreadsheet is restricted to authorised personnel with specific responsibilities related to safeguarding matters. We employ security measures, including password protection and encryption, to prevent unauthorised access or data breaches.

Data Sharing: We may share safeguarding-related information with relevant authorities or agencies, such as law enforcement or child protection services when required by law or to protect the safety and well-being of individuals.

Data Subject Rights: Individuals have the right to access their data held in the safeguarding spreadsheet and request corrections if any information is inaccurate. They can also request the erasure of their data in certain circumstances, subject to legal obligations and our safeguarding responsibilities.

Transparency and Confidentiality: We treat safeguarding matters with the utmost confidentiality and only share information on a need-to-know basis to protect the privacy of the individuals involved.

By implementing these data retention and disposal practices, we aim to ensure the protection and confidentiality of personal data while fulfilling our safeguarding responsibilities as a charity.

Your data protection rights:

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@reclaimproject.org.uk if you wish to make a request.

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at info@reclaimproject.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>