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1<sup>st</sup> September 2019



# **Camden Giving's Privacy Notice**

Here at Camden Giving, we take your privacy seriously and will only use your personal information for legitimate purposes. The type of information we collect might include your name, email address, postal address and telephone number.

## Why do we collect your information?

We may process your personal information for carefully considered and specific purposes which are in our interest but which we also believe has a genuine benefit to you. These interests may include some or all of the following:

- Where processing enables us to enhance, modify, personalise or otherwise improve our services and communication for the benefit of our users.
- To identify and prevent fraud and enhance the security of our network and information systems.
- To better understand how people interact with our website and social media to optimise our communication and identify which pages users visit most often.
- To provide e-marketing communication which we think will be of legitimate interest and/or benefit to you.
- To determine the impact and effectiveness of promotional campaigns and advertising.

#### How do we collect information?

We obtain personal information from you when you contact us directly through our website or otherwise provide us with personal information. We will only add you to our mailing list if you have specifically requested this once you have made contact with us.

We may also receive information about you from third parties and the data held by them will be dealt with in accordance with their own privacy policy. Camden Giving are not liable for how they collect, process or use this data.

#### How do we use this information?

We may use your personal information:

- to provide you with the services, products or information you have requested;
- to create a record in our database for you if you register to receive communication;
- to further our charitable aims, including for fundraising activities, volunteering opportunities and measuring the impact of our services;
- for administration purposes which may be to identify fundraising priorities;

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As part of this, we may analyse the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information. Where relevant, we may also assess your personal information for the purposes of fraud and credit risk reduction.

This privacy notice tells you what to expect when Camden Giving collects personal information. It applies to information about:

- Visitors to our websites;
- People who use our Services, eg who subscribe to our newsletter or apply for Grants;
- Data Processors/Third Party Providers;
- Job applicants, employees, trustees and volunteers;
- Complainants and other elements in relation to a data protection or freedom of information complaint or enquiry;

#### Visitors to our websites

We use a third party service, SquareSpace, to publish our website and the content within in. The sites are hosted at Squarespace.com. When someone visits <a href="www.camdengiving.org.uk">www.camdengiving.org.uk</a> we use Square Space Analytics to collect standard internet log information and details of visitor behaviour patterns to monitor and report on the effectiveness of the site and help us improve it. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow SquareSpace to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it. Camden Giving's website has a valid Encryption Certificate to protect personal data

For more information about how Squarespace processes data, please see <u>Squarespace's Privacy</u> Notice.

#### **E-newsletter Subscriptions**

Website users will be given the option to subscribe to our E-Newsletters and we use a third party provider, MailChimp, to deliver our e-newsletters. We send out tailored information and news depending on the type of Newsletter they have subscribed to (Business Newsletter or Charities/Residents Newsletter). We will not share personal data to third parties unless the subscriber gives us consent to do so. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. If you want to change how you receive the emails you can <u>update your preferences or unsubscribe from the list</u> at any time and are given an easy way of doing this. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted.

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For more information, please see MailChimp's privacy notice.

### Use of cookies by Camden Giving

Camden Giving uses cookies and similar technologies on our website to offer you a better browsing experience, analyse site traffic and personalise content. If you continue to use this site, you consent to our use of cookies. You can read more about how we use cookies on our Cookies page here.

#### **Security and performance**

Camden Giving's website domain and any third party domains connected includes SSL certificates for encryption. With SSL enabled our visitors can access a constant, secure connection on every page of our site and will see a lock icon next to our *URL* in the browser, showing that their information is safe. Search engines (such as Google) will index the secure version of your site, and visitors accessing the insecure version will be automatically directed to the secure version. To deliver this service Squarespace processes the IP addresses of visitors to Camden Giving's website.

### People who use our Services

Camden Giving offers various services to the public. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a publication to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this. We use third parties to deal with some requests, but they are only allowed to use the information for the restricted purpose of the request.

### People who call us

When you call Camden Giving we may collect Calling Line Identification (CLI) information - Calling Line Identity (CLI) is a method by which inbound calls made to a business or individual can be identified by their number of origin and, in some cases, the name of the person or organisation that is associated with the number. We use this information to help improve our efficiency and effectiveness. We minimise storage of personal details in our mobile contacts and where possible will use abbreviations.

#### People who email us

Our email provider uses Transport Layer Security (TLS) to encrypt and protect email traffic in line with the law. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us,

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including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## People who contact us via social media

We use a third party hosts Twitter, Linked-In and Instagram to manage our social media interactions. All of the content we publish is either Camden Giving's own or we have sought permission to use this from third parties. We will not publish personal identifiable data that could be easily traced back to an individual. If you send us a private or direct message via social media the message will be stored by Camden Giving for three months. It will not be shared with any other organisations.

You can view our social media host's privacy policies here:

Twitter Linked-In Instagram

#### **Organisations/Individuals applying for Grants**

When organisations apply for a grant under any of Camden Giving's Grants Programmes, they submit information in an application form (for example details of their organisation, proposal and costs) and submit documentation (for example governing documents and financial forecasts). Those who are awarded grants are asked to provide progress reports, a final report and final expenses. Any personal information that is provided in any application and during any activity that has been awarded a grant, are used for the purpose of reviewing the grant application, ongoing administration and management/mornitoring of applications and identifying funding gaps/needs. We will hold data on both successful and unsuccessful applications for these purposes.

We may also publish information about projects on our own website and social media, including the amount of grant awarded, the recipient of the grant and images, sometimes in the form of Infographics or Case Studies. We will only ever publish case studies which include information on beneficiaries with the consent of the individual and the organisation. We will not publish information if the organisation has less than 20 beneficiaries to protect identifiable individuals.

Some information regarding grants that are awarded are also published to third parties including current and potential donors and Camden Council. The information that will be made public may include the name of the grant programme and the funder's name (Camden Giving), a description of the grant's aims and objectives, the value of the grant, the date it was awarded and the name of recipient of the grant. When submitting your application, you will declare your consent to this processing but have the option to withdraw at any given time, subject to the grant terms.

If you use our online Grants application system Salesforce, you will provide the requested information using your own registered account (portal). Once you click 'apply now' on our website you will be taken to Gifts Online website and they will hold the information you submit. Camden

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Giving, our Trustees and Grants Panels will have access to some or all of this information and will only be used for legitimate purposes, such as reviewing applications to decide on which grants to award. We will always use Salesforce to store all applications we receive, even if they are originally submitted electronically or by post. We will then delete electronic and postal applications once we have completely uploaded the relevant application details to Salesforce.

Here is a link to Salesforce's Privacy Notice.

#### People who Fundraise for us

Individuals who fundraise for us might be required to submit sponsorship forms to enable us to claim Gift Aid on donations. The sponsorship forms will hold personal data from supporters but we will only disclose the necessary information to HMRC to enable us to claim gift aid. Once we have processed the sponsorship we will dispose of all of the forms and we will not use any information for other purposes.

## Use of data processors

Data processors are third parties who provide elements of our services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. Some data processors have already been listed above.

#### **Salesforce**

We use Salesforce to process grant applications to our funds (see above). We will also use Salesforce as a CRM Database to store information on individuals communication preferences and consent. We will refresh this as necessary to ensure the database is up to date and reflects individuals preferences if they change.

#### **CAF Bank**

If you are employed by Camden Giving, relevant details about you will be provided to *CAF Bank* who store your Bank Details for payroll purposes. This will include your name, bank details and address.

If you are a Grantee, *CAF Bank* may hold your bank details for processing invoices as Camden Giving will make grant payments through this provider.

Here is a link to their Privacy Notice.

## **Beehive Accountancy**

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If you are employed by Camden Giving, relevant details about you will be provided to Beehive Accountancy who provide payroll services to Camden Giving. This will include your name, bank details, address, date of birth, National Insurance Number and salary.

If you are a Grantees, Beehive Accountancy will be required to approve BACs Transfers and/or Cheque payments so will be required to store your bank details for processing purposes. Here is a link to their Privacy Notice.

#### **NEST Pensions**

If you are employed by Camden Giving, your details will be provided to *Nest* who are the administrators of the Pension Scheme. You will be auto-enrolled into the pension scheme and details provided to *NEST* will be your name, date of birth, National Insurance number and salary. Your bank details will not be passed to *NEST* at this time.

Here is a link to their Privacy Notice.

### **BT My Donate**

If you fundraise for Camden Giving through third party provider *BT My Donate*, we will need to process your information to manage your fundraising or donation, including processing Gift Aid. We will not pass your information on unless you consent for us to do so. You can also choose to withdraw this consent at any time by logging into your *BT My Donate* account.

Here is a link to their Privacy Notice.

## MailChimp

We use a third party provider, MailChimp, to deliver our e-newsletters to subscribers. We store personal contact details on our MailChimp account to monitor subscribers usage and activity. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.

Here is a link to their Privacy Notice.

## Job applicants for Employee, Trustees or Grant Panellist Roles

Camden Giving is the data controller for the information you provide during any recruitment process unless otherwise stated. You may be requested to provide a CV, Cover Letter and References. Trustees have a legal obligation to act in the best interests of Camden giving, and in accordance with the Camden Givens governing documents, and to avoid situations where there might be a potential conflict of interest. Staff and volunteers have similar obligations. We publish our Trustee and

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Employee Conflict of Interest declarations on our public website for purposes of transparency and accountability.

If you are applying for a role through our website and you have queries about the process or how we handle your information please contact us at <a href="mailto:admin@camdengiving.org.uk">admin@camdengiving.org.uk</a>

# People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention procedures. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **Complaints or queries**

Camden Giving tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Camden Giving collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you want to make a complaint about the way we have processed your personal information you can contact us <a href="mailto:admin@camdengiving.org.uk">admin@camdengiving.org.uk</a>

## Disclosure of personal information

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In many circumstances we will not disclose personal data without consent. However, we may need to share your information with our service providers, associated organisations and agents for legitimate purposes described in this Privacy Notice. Where we use service providers we will make sure there are appropriate controls in place. We may also need to disclose your information if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so. When we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies. We will not sell any information about your web browsing activity.

You can also get further information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

## **Retaining your information**

We'll retain your personal information for as long as we need it to provide you with the services you've requested or until you inform us that you no longer wish to be contacted. We review personal data we store annually and the retention period of all data varies, which we document in our Information Asset Register. You can ask for your personal information to be deleted at any time by contacting us by post to Camden Collective, 5 - 7 Buck Street, NW1 8NJ or by email to <a href="mailto:admin@camdengiving.org.uk">admin@camdengiving.org.uk</a>. Please note that there may be latency in deleting your personal information from our servers and backup storage, and we may retain your personal information in order to comply with the law, protect our rights, resolve disputes or enforce our agreements

## How do we protect your personal information?

Whenever we process data for these purposes we will ensure that we always keep your Personal Data rights in high regard and take accountability for these rights.

We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. We update our Information Asset Register as often as necessary to ensure we are only storing relevant and current information on our users.

# Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

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## Access to personal information

Camden Giving tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Camden Giving for any personal information we may hold you need to put the request in writing addressing it to <a href="mailto:admin@camdengiving.org.uk">admin@camdengiving.org.uk</a> or you can contact us by post to Camden Collective, 5 - 7 Buck Street, NW1 8NJ . If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone, within 40 days from receiving your request. If we do hold information about you, you can ask us to correct any mistakes by contacting us as stated above.

## Your choices

You have a choice about whether you want to receive information about communication from Camden Giving that is of legitimate interest and/or benefit to you. You can change your marketing and communication preferences at any time by contacting us by post to Camden Collective, 5 - 7 Buck Street, NW1 8NJ or by email to <a href="mailto:admin@camdengiving.org.uk">admin@camdengiving.org.uk</a>.

#### Your consent

By providing us with your personal data, you consent to the collection and use of this information in accordance with the purposes described above and this privacy statement.

## Changes to your details

If your personal details change, please help us to keep your information up to date by notifying us at the above contact details.

We may change the terms of this privacy statement. If we do so, we will post the changes here so please check from time to time. By continuing to use our websites you will be deemed to have accepted such changes.

### Links to other websites

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This privacy notice does not cover the links within this site linking to other websites. Camden Giving is not responsible for the privacy practices of these other websites so we encourage you to read their privacy statements.

## Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 21 December 2018.

### How to contact us

If you want to request further information about our privacy policy you can <a href="mailto:em