

FOUNTAIN OF LIFE

DATA PROTECTION POLICY

PROTECTING AND RESPECTING YOUR PRIVACY

Data Protection Policy

At Fountain of Life, we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Any questions regarding this policy and our privacy practices should be sent by email to dataprotection@fountainoflife.org.uk

Fountain of Life will ensure that all personal data that it holds will be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and kept up to date;
- Kept in a form which permits identification of data subjects for no longer than is necessary;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

1. Who are we?

In this policy 'Fountain of Life', 'we', 'us' or 'our' means: Fountain of Life, registered charity (no. 1162815).

Registered address is 26 Langley Road, Chippenham, Wiltshire SN15 1BX.

2. How do we collect information from you?

We obtain information about you in the following ways:

2.1 Information you give us directly

For example, we may obtain information about you when you take part in one of our events, make a donation, apply to volunteer for us.

2.2 Information you give us indirectly

Your information may be shared with us by third parties, which might include:

- Through fundraising sites such as Virgin Money Giving.
- Online payment processors such as PayPal.
- Online marketing platforms such as Mailchimp.

These organisations will have their own privacy policies, and/or statements so please do ensure you check when providing your personal information to them.

2.3 When you visit our website

We, like many companies, automatically collect the following information:

- Technical information, including the type of device you are using, the IP address, browser and operating system being used to connect your computer to the internet. This information may be used to improve the services we offer.
- Information about your visit to this website, for example we collect information about pages you visit and how you navigate the website, i.e. length of visits to certain pages, what you viewed and searched for, referral sources (e.g. how you arrived at our website).

We collect and use your personal information by using cookies on our website – more information on cookies can be found under the 'Use of Cookies' section below.

2.4 Social Media

When you interact with us on social media platforms such as Facebook, Instagram, Twitter and LinkedIn we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms.

3. What type of information is collected from you?

The personal information we collect, store and use might include:

- Your name and contact details (including postal address, email address and telephone number).
- your date of birth.
- Marketing data such as your preferences for receiving communications from us.
- Transaction data, including details of your giving.
- Information about your activities on our website and about the device used to access it, for instance your IP address and geographical location.
- Your bank or credit card details. If you make a donation online, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.
- Information as to whether you are a UK taxpayer so we can claim gift aid, and
- Any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We do not usually collect sensitive data about you unless there is a clear and valid reason for doing so and data protection laws allow us to, for example, we may ask for your health information if you are taking part in an overseas trip and/or physical activity on behalf of Fountain of Life.

Where appropriate, we will make why we are collecting this type of information and what it will be used for clear.

4. How and why is your information used?

We will use your personal information in a number of ways depending on the purposes for which it has been collected, including for the following purposes:

- To provide you with the services or any information you have requested.
- To update you about any changes to our services.
- To communicate with you as set out in this policy below (including administrative communications as well as communications about our work, services, fundraising and events).
- To administer payments such as donations, including Gift Aid processing.
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To maintain our organisational records and ensure we have your most up-to-date details, including marketing preferences.
- To help us improve our services, campaigns or information-offering, and improve your interactions with our website (including via cookies).
- To enable you to participate in interactive features on our website.
- To enable you to participate in voluntary surveys or research.
- To analyse your website behaviour.
- To administer your volunteering or employment application.
- To assist in your voluntary or fundraising work, or to run our events.
- To deal with enquiries and/or complaints made by or about you.
- To audit and/or administer our accounts.

5. Communicating with you

5.1 Administrative communications

We will communicate with you using the contact details you have provided for essential administrative purposes, such as to administer a donation or provide you with information regarding a fundraising event you have asked to take part in.

5.2 Marketing communications

We love to keep our supporters up to date with our fundraising, marketing and campaign activity.

If you have given us your consent to do so, we will contact you for marketing purposes by email, SMS message and telephone calls. We may also send you communications by post, on the basis it is in our legitimate interests to do so, unless you ask us not to.

We currently send the following marketing materials:

- (a) Updates about our work – including newsletters.
- (b) Appeals and fundraising activities – including requests for donations, information about how you can leave us a gift in your will, and how you can take part in fundraising events or fundraise on our behalf, as well as the impact all of this has on our work.

You are in control of how we use your personal information for marketing and fundraising purposes and can update your preferences at any time. If you would like to contact us about your marketing preferences, please email dataprotection@fountainoflife.org.uk we will be happy to answer any queries you may have. If you do ask us to stop sending marketing communications, please note that we will continue to send you administrative communications as needed.

If you ask us to stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

6. How long is your information kept for?

For some information we hold, there are legal requirements which determine how long we must keep it. For example, HMRC require us to retain details of Gift Aid for at least six years after the year in which the last donation was made.

Generally, we hold your personal information on our systems for as long as is necessary for the relevant activity, for example, in general we will only keep your contact information for as long as our interactions with you continue and for six years thereafter.

7. How we keep your information up to date

Where possible, we try to keep your records up to date. However, we really appreciate it if you let us know if your contact details change.

8. Who has access to your information?

We do not sell or rent your information to third parties. We do not share your information with third parties for marketing purposes. However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy.

8.1 Third parties working on our behalf

We may pass your information to our third-party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

9. Lawful Processing

Data privacy law requires us to have one or more lawful grounds to process your personal information. The following grounds are relevant to our use of your information:

- Consent. In many cases we will seek consent to process your personal information, for example to send you marketing and fundraising emails. Where we do rely on consent, you are entitled to withdraw it at any time.
- To protect your vital interests. For example, to ensure you get urgent medical assistance if needed when taking part in a fundraising event or physical activity.
- Where we have a contractual relationship with you. Though the majority of our relationships are voluntary, if we enter into a contract with you, we will process information to administer that contract.
- Legal obligations. We will sometimes pass on personal information to comply with legal obligations such as providing tax and gift aid information to HMRC.
- “Legitimate Interests”. Where it is appropriate, we rely on the processing being in our legitimate interests, provided we are confident that such processing is not likely to override your own legitimate interests or rights and freedoms. For example, sending you marketing and fundraising post, provided this is done in an unobtrusive manner.

9.1 Legitimate interests

Fountain of Life's legitimate interests are ultimately in pursuit of our charitable objectives, including:

- Governance and operational management, employee and volunteer administration and management.
- Publicity and income generation, such as marketing and fundraising, events, and supporter analysis.
- Administration, such as Gift Aid.
- Financial management and control, such as processing donations.

10. Your Rights

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that we think apply:

- The right to rectification: To have personal information amended if it is inaccurate or incomplete. You can ask us to check the personal data that we hold about you if you are unsure.
- The right to erasure: In some cases, to have your personal information erased (or anonymised), including when consent is withdrawn, your information is being unlawfully processed or it is no longer necessary for us to process it.
- The right to data portability. Where we are processing your information on the basis of consent you can request it to be transferred from one service provider to another in a suitable format.
- The right to object. You can ask us to stop processing your personal information in certain circumstances, including an absolute right to ask us to stop processing for direct marketing.
- The right to restrict processing. If there is any disagreement about the accuracy or legitimate usage of your personal information, you can ask us to "hold" it but not use it further, whilst the issue is resolved.
- You also have rights in relation to "automated decision making". Fountain of Life does not currently undertake this activity, which involves complex computerised processes which produce legal effects.

If you want to enforce any of these rights in respect to your personal information, please contact: The Data Protection Officer, Fountain of Life, 26 Langley Road, Chippenham, Wiltshire SN15 1BX or email dataprotection@fountainoflife.org.uk

11. Keeping your information safe

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it.

We only allow authorised personnel to have access to your information i.e. Fountain of Life staff and/or volunteers who have a valid reason for knowing and/or using such information.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

12. Use of 'cookies'

Like many other websites, our website uses cookies. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences.

13. Links to other websites

Our website may contain links to other websites run by other organisations. This policy applies only to Fountain of Life and our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the privacy policy of that third party site.

14. Children's data

While we do not actively collect information from children (under-18s), we appreciate that our supporters are of all ages. Where appropriate, we will always ask for consent from a parent or guardian to collect information about children.

15. Review of this Policy

We keep this policy under regular review. This policy was last updated in June 2021.

Change Record

Date of Change:	Changed By:	Comments:
21/06/2021	MP	Document created