

Steps Privacy Notice

This Notice explains how and why we use your Personal Data, to ensure you remain informed and in control of your information.



Date policy passed by Trustees: October 2019

Steps Privacy Notice

1. Introduction

Steps (Registered Charity No 1063143 Registered Office: The Old School, 40 Loughborough Road, Shepshed, LE12 9DN) is committed to protecting your privacy and security.

This Notice explains how and why we use your Personal Data, to ensure you remain informed and in control of your information.

This Privacy Notice applies to anyone that we contact, including but not exclusively; trustees, members, employees, customers, volunteers, the public and professional contacts.

We will never sell your Personal Data and will only ever share it with organisations we work with where necessary and if data privacy and security are guaranteed.

You can ask questions in relation to this Notice or how we use your Personal Data, decide not to receive communications from us, or change how we contact you at any time. If you wish to do so, please contact Steps by emailing info@stepscentre.org.uk or calling us on 01509 506878

2. What is personal data?

This Notice sets out how we will control and process data that can be associated with or which relates to a person and/or could be used to identify a person ("Personal Data").

"Non-Personal Data" is therefore any information that does not relate to a person and/or cannot be used to identify a person. When you interact with Steps, we may also collect Non-Personal Data. The limitations and requirements in this Notice on our collection, use, disclosure, transfer and storage of Personal Data do not apply to Non-Personal Data.

3. What personal data do we collect?

Personal Data you provide...

We collect data you provide to us during our usual operations. This includes information you give when joining as an employee or member, engaging our services or communicating with us. For example:

- Personal details (e.g. name, email, address, telephone etc.) when you become a member, employee, volunteer or customer; make an enquiry; attend an event; or participate in a consultation activity.
- Financial information (e.g. bank details when you pay us, or we need to pay you).
- Details of your interests and preferences (such as our services you use or enquire about, events you attend, or organisations you represent).

- Demographic (e.g. age, gender etc.), medical and next of kin information when you are employed or volunteer with us, participate in a consultation activity or attend an event when this is necessary.

Data collected automatically...

We automatically collect certain technical data if you interact with us online via a computer, tablet, smart phone or other online device (“Automatic Data”). Automatic Data includes without limitation, a unique identifier associated with your access device and /or browser (including, for example your Internet Protocol (IP) address) and other data collected through Cookies and other similar technologies. You can find out more information about how we use Cookies and other similar tracking technologies in section 10 of this Notice.

Data created by your involvement with Steps...

Your activities and involvement with Steps may result in Personal Data being created. This could include details of your enquiries and/or services we have provided to you, responses you provide to consultations we undertake, input you provide at events we hold, or work you have undertaken for us. If you make a payment or donation to us, then we will keep records of when and how much you give.

Data we generate...

We may conduct research and analysis on the information we hold, which can in turn generate Personal Data. For example, profiling your interests and involvement with us to target our communications or analysing input and responses you submit within surveys or at events we facilitate.

Data from third parties...

We sometimes receive Personal Data about individuals from third parties. For example, if we are partnering with or contracted to work on behalf of another organisation (e.g. you provide your information to another organisation we’re collaborating with or working for). Also, we may use third parties to help us conduct research and analysis on Personal Data (and this can result in new Personal Data being created).

In circumstances where your information may be shared with us by independent third parties, you should check their Privacy Notice when you provide your information to understand fully how they will control and process your data.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Sensitive personal data...

We do not normally collect or store sensitive Personal Data (such as information relating to health, beliefs or political affiliation). There are some situations where this will occur, and in these circumstances, we’ll take extra care to ensure your privacy rights are protected. Such situations may include:

- **Accidents or incidents** - If an accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data). We may also be required to share this with the appropriate statutory bodies.
- **Employees and volunteers** - If you are an employee or volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us and you (including in the event of an insurance or legal claim) and for safeguarding purposes.

4. How we use personal data

We only ever use your personal data with your consent, or where it is necessary to:

- a. Enter into, or perform, a contract with you;
- b. Comply with a legal duty;
- c. Protect your vital interests;
- d. For our own (or a third party's) lawful legitimate interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose(s) we collected and for closely related activities including:

Marketing - We may use personal data we hold to communicate with you and to promote Steps. This includes keeping you up to date with our news, services, events and other relevant information. For further information on this please see Section 6 of this Notice.

Administration - We use personal data for administrative purposes including:

- maintaining databases of our employees, volunteers, members, customers and contacts;
- performing our obligations under membership and service delivery contracts;
- responding to enquiries or providing services (online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive specific or marketing material, we'll keep a record of this).

Internal data analysis - We may carry out analysis of data to determine the quality and success of communications and marketing, service delivery, and events. This helps inform our work and makes Steps a stronger and more effective organisation. Understanding our members and customers, including their interests and priorities helps us provide a better service (e.g. more relevant communications).

Anonymising data - We may aggregate and anonymise Personal Data so that it can no longer be linked to any individual person (i.e. it becomes Non-Personal Data). This information can be used for a variety of purposes, such as recruiting new members, attracting customers, securing grant funding or service delivery contracts,

or to identify trends or patterns within our existing member and supporter base. This information helps inform our actions and improve our projects/services and materials.

5. Disclosing and sharing data

We will never sell your Personal Data. We may contact you with information about our partners, or third-party products and services, but these communications will always come from Steps and are usually incorporated into our own communications (e.g. leaflets, emails or e-newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. These activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another organisation). We'll only share information when necessary and for the purposes that you have provided the data to us.

6. Marketing

Unless you specifically tell us not to, if you are a Steps member or customer, we may contact you from time to time with marketing communications. These will usually be sent via e-mail. If you are not a member or customer, we will ask you to 'opt in' to receiving all marketing information.

7. Children

Where possible we will avoid collecting Personal Data from individuals under the age of 16.

Some of the services we offer are aimed specifically at

- engaging young people (for example, volunteering opportunities, fundraising and awareness sessions) and to deliver these services safely and effectively it will sometimes be necessary for us to collect Personal Data.
- Siblings attending Steps events.

In these circumstances we'll only collect, process or use the Personal Data of anyone under the age of 16 with consent of a parent or guardian. We will always take reasonable steps to ensure consent is legitimate.

8. How we protect data

We always maintain suitable physical, electronic and managerial procedures to safeguard and secure your Personal Data when it is stored or processed within our systems. Personal Data you transfer to us electronically (e.g. via e-mail, our website, social media or any other online channel) or via post can never be guaranteed to be 100% secure. As a result, while we strive to protect your data, we cannot guarantee the security of any data you transmit to us, and you do so at your own risk.

9. Storage

How we store data...

Where possible we store all Personal Data electronically in a commonly accessible format within secure and protected computer and cloud-based storage systems.

We will minimise the collection and storage of Personal Data in hard copy, however where this is essential it will be stored in a suitably secure and protected manner (for example within a lockable storage area).

How long we store data... We operate a policy of data minimisation. We only use and store information for so long as it is required for the purposes it was collected. How long information will be stored depends on the information in question and what it is being used for. We will regularly review the type and associated retention periods for information we hold and securely destroy or delete what is no longer required. Your right to ask for data to be deleted is set out in Section 11.

10. Cookies and privacy online

Cookies... A cookie is a small file which asks permission to be placed on your computer's hard drive. If you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used on our websites. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs.

We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with better online content, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Links to other websites... We may provide you with links to third party websites of interest. However, once you have used these links, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Notice. You should exercise caution and look at the privacy statement applicable to the website in question.

Social Media... We operate several social media pages (including Facebook) Although this Notice covers how we will use any data collected from those pages, it does not cover how third-party providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

11. Keeping you in control

Your rights... Part of keeping you in control of any Personal Data we collect is ensuring that you understand your legal rights, which are as follows:

- The right to be informed if we hold any of your Personal Data and, if we do, to obtain a copy of the Personal Data we hold (this is known as subject access request)
- The right to have your Personal Data erased (this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- The right to have inaccurate Personal Data rectified
- The right to object to your Personal Data being used for marketing or analysis
- The right to data portability (where technically feasible, you have the right to see personal details)
- Data you have provided to us which we process automatically based on your consent or the performance of a contract. This information will be provided in a common electronic format)

Please keep in mind that there are exceptions to the rights above and although we will always try to respond to your satisfaction, there may be situations where we are unable to do so. If you would like further information on your rights or wish to exercise them, please contact Steps by emailing info@stepscentre.org.uk or calling us on 01509 506878

How you can access or update your information...

You can ask for a copy of the information we hold about you at any time and the accuracy of your information is important to us. If you would like a copy of the information we hold, your contact details change, or if you believe any of the other information we hold about you is inaccurate or out of date, please email info@stepscentre.org.uk or contact us on 01509 506878

Complaints...

You can complain to Steps directly by contacting us using the details set out above. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk.

12. Changes to this privacy notice

We review and amend this Privacy Notice from time to time to ensure it remains up to date.

This Privacy Notice was last updated on 21 October 2019

Signature of Trustee:

Date: 24th October 2019

