# The Whitechapel Centre

# Privacy Policy

The Whitechapel Centre promises to protect and respect your privacy. This Privacy Policy explains how we use any personal information we collect about you. It applies to information we collect about:

* Visitors to our website;
* People who use our services and we provide support to;
* Referrals to our services;
* People who support us, take part in events or fundraise for us;
* People we contact for marketing purposes;
* Job applicants and our current and former employees.

It covers how we process any personal information you provide to us, as well as how we're committed to keeping it safe and managing it in line with data protection laws.

Our supporters play an essential role for The Whitechapel Centre, either by donating goods, volunteering time, fundraising or making a financial donation. The information you provide helps us to carry out our life changing work, and allows us to let you know about the difference you're making.

**What information do we collect?**

This will depend on your interaction with The Whitechapel Centre. We will not collect more information that we need to fulfil our stated purposes and will not retain it for longer than is necessary.

**For visitors to our website:**

We collect information when you submit a form to contact us this allows us to respond to your feedback or referral, direct it to the correct team, and contact you with a response. Website usage information is collected using cookies; Weebly and Google Analytics are used to collect standard anonymous internet log information and details of visitor behaviour patterns.

**For people wanting to support** **us or take part in fundraising**, the information we collect is likely to include some of the following information:

* Name
* Contact details
* Date of birth
* Social media details
* Bank account details – when you make a donation on our website the charity does not record or store your bank details. All online processing of card payments in managed externally by a payment processing company on behalf of the charity.
* Why you have decided to donate to us. We will never make this question mandatory, and only want to know the answer if you are comfortable telling us
* And where appropriate, Information relating to your health (for example if you are taking part in a high risk event)

**For referrals to our services** and our current and past service users, this information is likely to include:

* Name;
* Contact details ;
* Date of birth;
* Information relating to your health ;
* Housing history;
* Alcohol or substance use;
* Criminal convictions;
* Information around the support we provide or have provided to you.

**For job applicants**, current and former employees of The Whitechapel Centre:

The information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide us during the recruitment process with any third parties for marketing purposes.

**For children’s data:**

We collect and manage information from children, and aim to manage it in a way which is appropriate to the age of the child.  Information is usually collected when children attend our events or fundraise for us. But it can also be sensitive personal data - of children who are supported by our services.

Where possible and appropriate we will seek consent from a parent or guardian before collecting information about children.  Our events have specific rules about whether children can participate, and we‘ll make sure advertising for those events is age appropriate.

**How we collect information about you**

We collect information in the following ways:

**Information you provide to us directly**

You may give us information in order to sign up for one our events, make a donation, register as a volunteer, self-refer for support services, apply for a job or otherwise communicate with us.

**Information you provide indirectly**

Your information may be shared with us by other organisations ;

* Fundraising related activities e.g. Nightrider event or fundraising sites like Just Giving or Virgin Money Giving.
* Other agencies who refer you to us for support e.g. Support Agencies, Housing Options Service, Liverpool City Council, Housing Associations
* Employment agencies

These independent third parties will only pass on your information when you have given your consent that you wish to support or hear from The Whitechapel Centre. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

**Information from other sources**

* **Social Media -** Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.
* **Information available publicly -** This may include information found in places such as Companies House and information that has been published in articles/ newspapers.
* **Website** - When you use our website your personal data is collected using “cookies” and other tracking methods.

**How we use and process information**

We will not share any of the information provided to us in any interaction with any third parties for marketing purposes. The information you provide to us will be held securely by us and/or our data processors whether the information is in electronic or physical format. We will not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

After we have received your information, there are a variety of ways in which we might use it to ensure we give you the best possible service.

**For supporters:**

We will mainly use your data to:

* Provide you with the services, products or information you asked for
* Administer your donation or support your fundraising, including processing gift aid
* Keep a record of your relationship with us
* Process your volunteering or job application
* Ensure we know how you prefer to be contacted
* Understand how we can improve our services, products or information.

**For our clients:**

We provide support services to individuals and families with housing and support needs and collect personal data in order to provide those services. This information is managed separately from other data provided to the charity.

Support workers may collect sensitive personal data about your housing, health, social needs, substance use and offending history when you speak, email or send an instant message to them. They will use this information to answer your questions and give advice, support or guidance. We will also use it for training, quality monitoring or evaluating the services we provide.

We process some of the sensitive personal data you might provide, (e.g. information about your health, ethnicity) where you have given your consent to do so, as set out on applicable forms, or where you have made that information manifestly public.

We have to hold these details via our in-house database or Mainstay\* in order to provide you with the right advice, support or service. However, we only use these details to provide the service the person has requested.

We will keep you personal information confidential and will not disclose it to any third party without your consent, unless we are obliged to do so by law.

Mainstay was created to provide improved access to short-term Housing Related Support services for single persons (and couples in some circumstances) within Liverpool City Region.  With your consent, your personal information may be stored on Mainstay, providing easier access into the right services.

Mainstay does not sell, rent, share or otherwise distribute any of your personal information to third parties except in certain specific circumstances. Those circumstances are as follows:

1. We receive a subpoena, court order or other legal demand for your information.
2. We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, or as otherwise required by law.
3. Mainstay is acquired by or merged with another company. In this event Mainstay will notify you before your information is transferred and becomes subject to a different privacy policy.
4. Some of our services allow you to make certain information public or accessible to certain individuals. If you make use of these services Mainstay will share your information as you request.

**Direct Marketing:**

With your consent, we will contact you to let you know about the progress we are making and to ask for donations or other support. Occasionally, we may include information from partner organisations or organisations who support us in these communications. You can opt out of these communications at any time by contacting us on 0151 207 7617 or fundraising@whitechapelcentre.co.uk

We do not sell or share personal details to third parties for the purposes of marketing. However, if we run an event in partnership with another named organisation your details may need to be shared. We will be very clear what will happen to your data when you register.

**Employees or job applicants:**

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for. If you are unsuccessful at any stage of the process, the information you have provided until that point and any information we have generated throughout the assessment process, will be retained in accordance with our Document Retention Policy. If you are successful, the information you provide during the application process will be retained as part of your employee file for the duration of your employment and, following the end of your employment, it will be retained in accordance with our Document Retention Policy.

**Meeting our legal obligations:**

If we have a legal obligation to use or disclose information about you for instance, where we are ordered by a court or regulatory authority or we are legally required to hold donor transaction details for Gift Aid or accounting/tax purposes, or to HMRC, we will need to share relevant personal information with the organisation concerned.

**Legitimate Interests:**

In certain instances, we may collect and use personal information where this is necessary for our own legitimate interest.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Privacy Policy and that does not intrude on your privacy or previously expressed marketing preferences.

**How we keep your information safe**

We ensure that there are appropriate technical controls in place to protect your personal details.  For example our online forms are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

**Who has access to your data**

**We will never sell or pass on your personal information to third parties for their own marketing purposes.**There may be some third parties that we need to share personal information with in order to help us provide services and products to you and to run our website, including the following:

* Our advisors, in order to help us better manage, support or develop our organisation and comply with legal and regulatory obligations;
* Any service providers who need to know certain information in order to provide you (or us) with a product or service
* Our partners including, for example, event organisers we work with;
* Law enforcement bodies and/or regulatory entities, in order to comply with any legal obligation or court order.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA).  Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent. However, if you do choose to share your information with us publicly (for example, photos or footage on social media), then it's possible that other people may have copied this information during the time that it was live, and therefore use of it is beyond our control.

We may share anonymised data about you with organisations engaged in related research activities to help improve transplant outcomes for our patients, but, as this information is anonymised, these organisations will be unable to identify the information as relating to you.

**Your rights**

You have the right to:

* be told how your personal information will be used;
* request a copy of the information we hold about you;
* update or amend the information we hold about you if it is wrong;
* change your communication preferences at any time;
* ask us to restrict the processing of your personal information if there is a disagreement about its accuracy or legitimate use;
* ask us to remove your personal information from our records;
* request an electronic copy of your personal information be sent to you, or another organisation;
* object to the processing of your information for marketing purposes on the basis of a legitimate interest or for statistical purposes;
* ask us for human intervention or to challenge any such decision where we take automated decisions in relation to your personal information; or
* raise a concern or complaint about the way in which your information is being used.

The information you provide will be retained by us in accordance with applicable laws. We will take reasonable steps to destroy or de-identify personal information we hold if it's no longer needed in connection with the purpose(s) for which it was collected and/or processed.

**Updates to this policy**

This Privacy Policy was updated in **May 2018**. We will keep it under review and make updates from time to time. If we make any significant changes to the way we treat your personal information, we will make this clear on the The Whitechapel Centre website or by contacting you directly.

**Questions or complaints**

If you have any questions, concerns or complaints, or would like to obtain a copy of the information we hold about you, please contact the Data Protection Team at:

Data Protection

The Whitechapel Centre

Langsdale Street
Liverpool L3 8DT

Email: data@whitechapelcentre.co.uk

Or you can find out more on the Information Commissioner's Office website at <https://ico.org.uk/>