



Privacy Policy

About this Policy

We know privacy is important to you and we are committed to safeguarding your data. This privacy notice outlines what data we collect, how we may use it, how we protect your data, your rights, and how you can exercise those rights. It applies to information we collect about:

- Visitors to our website
- Individuals we work with and provide services for
- Members
- Supporters and donors
- Volunteers
- Staff
- Individuals who make enquiries or raise complaints
- Individuals who sign on to join our events and/or fundraise for OneBodyOneFaith

References to 'we' or 'us' are to OneBodyOneFaith.

This privacy policy was prepared to be as comprehensive as possible, but it does not include an exhaustive list of every aspect our collection and use of personal information. However, we would be happy to provide any further information or explanation about our practices.

01. Why we collect your data

We collect personal data for many reasons, including the proper provision of services, to better communicate with individuals engaged with our work, and to administer events and donations. Depending on how you interact with us, we may process data for the following reasons:

 to record and contact you regarding donations you make to OneBodyOneFaith





- to communicate with you regarding OneBodyOneFaith's work when you have opted-in to this
- to process donations and administer Gift Aid information for any donation you make to OneBodyOneFaith
- to provide you with information about and to administer events, including mass participation events, concerts, and supporter meetings
- for our own internal administrative purposes, and to keep a record of your relationship with us
- to manage your communication preferences
- to process job applications or volunteer placements
- to conduct surveys, research and gather feedback
- to obtain information to improve OneBodyOneFaith's services and user experiences
- to carry out research to find out more information about our supporters' and prospective supporters' backgrounds and interests
- to provide third parties (namely partner venues, volunteers and grant providers) anonymised aggregated information of our yearly outcomes
- to deal with enquiries and complaints
- to comply with applicable laws and regulations, and to comply with requests from statutory agencies
- to verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us. Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.





Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

We have never supplied nor will ever supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

02. What information we collect

We may ask you for the following personal information:

- your full name
- contact details including your postal address, telephone number(s), and email address
- date of birth
- gender
- your bank details when administering a donation or regular gift
- records of your correspondence and engagement with us, i.e. volunteer and event participation history
- National Insurance, CV's and ID documents that you have asked/given permission for us to hold
- donation history and Gift Aid details
- your communication preferences
- information you may enter on the OneBodyOneFaith website
- photographs, video or audio recordings
- biographical information
- other personal information you share with us

If you visit our website or social media pages, we may automatically collect the following information:

- which pages you visit
- your IP address
- the amount of time you spend on our website
- whether you are a new visitor
- how you came to our website
- geographical location
- the type of device and browser you use

Cookies





We may automatically collect the information above through the use of "cookies" and we will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

Blocking or deleting cookies will have a negative impact on the usability of our website.

Google Analytics

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. The Google privacy

policy https://www.google.com/policies/privacy/ describes how they treat personal information when we use Google's products and services, including Google Analytics.

Sensitive Personal Data

We sometimes collect sensitive, personal data about individuals who access our services. This may include information about an individual's health, religion, sexuality, ethnicity, political and philosophical beliefs and criminal record. We will only record this data if we either have the individual's **explicit written consent**, or if we can document an alternative legal basis for processing data in the interest for the proper and safe administration of our services (see section on the legal basis for processing information)

03. How we collect information

Data on individuals may be collected via:

- any paper forms you complete
- telephone conversations
- email communications
- face-to-face interactions
- digital forms completed via our website (including CV's and applications), or online surveys





- third-party companies and websites such as Stripe, GoCardless, CAF Donate, PayPal, EventBrite and MailChimp
- publicly available sources
- digital communication (eg: social media and email)

Please let us know if the personal information that we hold about you needs to be corrected or updated. Please find information on <u>how to contact us</u> in the last section of this notice.

04. What we do with your personal information

Because of the different uses we have for different types of data, we handle data on individuals who use our services differently than individuals who volunteer at or support OneBodyOneFaith. Also please find information below on how we handle information about staff and job applicants.

OneBodyOneFaith Services (casework and winter services)

Fundraising/campaigning/direct marketing

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

We use a range of marketing activities and channels to contact our supporters - including our website, face-to-face fundraising, direct mail, SMS messaging, phone calls and email.

We will obtain your consent to contact you by email and SMS messaging for marketing purposes.

We will send you marketing by post and call you regarding our appeals, on the basis of it being within our legitimate interests to do so, unless you opt-out or are signed up to the Telephone Preference Service. See section 'Our legal basis for processing data' for more information about our use of legitimate interests.

We send digital and print marketing materials on the following activities:

1. updates about OneBodyOneFaith's work and future plans (via print newsletters, annual reports, e-newsletters) to inform you of how your





involvement is making a difference in the lives of the people who turn to us for support

- 2. appeals and fundraising activities including requests for donations; information about how you can leave a gift in your will, how you can raise money on our behalf, attend or take part in a fundraising event; and updates on the impact that your fundraising activities have had on our work
- 3. events- please note that if you sign up to a OneBodyOneFaith event, we will also send you administrative communications about how you can take part. On occasion we will also send you a reminder about the same event in future years, in case you want to participate in it again.
- 4. volunteering information about how you can help support OneBodyOneFaith by giving up your time or using your influence to progress our aims, along with updates on the impact of your involvement and invitations to volunteer-specific training and networking opportunities.

We will never share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

Administrative communications to supporters

In addition to the fundraising and marketing communications that you receive from OneBodyOneFaith, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters. For example, we will email you after you have set up a Direct Debit or to confirm your details. There may also be other occasions where we need to contact you about your donation - for example, if there is a problem with a payment or in relation to your gift aid declaration.

On occasion, we will also contact you about an event that you have signed up to participate in.

As mentioned above, we may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

Supporter research and analysis





We may use profiling and database segmentation techniques to analyse your personal information, and create a profile of your interests, preferences and ability to donate. This allows us to ensure communications are relevant and timely, to provide an improved experience for our supporters. It also helps us understand the background of our supporters so that we can make appropriate requests to those who may be willing and able to donate more than they already do, or leave a gift in their will. This enables us to raise funds quicker and in the most cost-effective way.

We use information that is already in the public domain (information that has been published in print or online) to identify high-net-worth individuals who may be interested in supporting our work with a major gift. These publicly available sources of information include Companies House, the electoral register, the phone book, the Charity Commission's Register of Charities, Who's Who, LinkedIn, company annual reports, and articles in newspapers and magazines. We do not use publicly available sources that we consider would be intrusive for this purpose, such as Facebook, Twitter, JustGiving, the Land Registry, online planning applications, or websites that are like these. We also carry out research to identify existing supporters who may be able to join our major donor programme. This is based both on publicly available information and information our supporters have given us voluntarily (e.g. where a person lives, who they bank with, what their occupation is and their age).

Under data protection legislation, you have the right to object to your data being processed in this way. If you have any concerns, please contact us..

We are also legally required to carry out checks on individuals who give us large donations, to comply with our duties in respect of anti-money laundering legislation and the prevention of fraud.

Applying for a OneBodyOneFaith job

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process through the statistics collected. Where we need to share your data - such as for gathering references, obtaining a Disclosure and Barring Services (depends on the role), or a prison clearance (depends on the role) - you will be informed beforehand, unless the disclosure is required by law. These checks are done only after a position has been offered and only to the successful candidate. We will





contact referees supplied by the applicant only after receiving permission from the applicant to do so.

Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it.

Once you have taken up employment with OneBodyOneFaith, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

Children

If a child (<16) signs up and participates in a OneBodyOneFaith event their details will be added to our system. This is done so we can account for any individual raising money on our behalf as required by law and to track people taking part in our events. Any emergency contact details will be held for the duration of the event; this is so we can ensure the safety of each participant and have access to any emergency contacts if necessary. Once the event is complete, we will then remove all emergency contact details from our system. Any children signing up for an event will not be contacted for direct marketing even if they have opted-in to receive these types of communications.

05. Withdrawing consent

You can withdraw your consent, unsubscribe or update your marketing preferences at any point by emailing us or, if you are a member, in the Members Area of our website.

Electronic marketing communications, such as e-newsletters, will have a link to unsubscribe, so you can manage your own communication preferences.

If you make any changes to your consent, we will update your record as soon as we possibly can. It may take up to 28 days for our systems to update and stop any postal communications from being sent to you. Email communications will, however, be stopped immediately. If you tell us you do not wish to receive marketing, fundraising or campaign communications, you may still receive





transactional and service-based communications confirming and servicing other relationships you have with us (as described below).

Where possible, we cleanse and remove out-of-date data by checking it against publicly available records such as deceased records. This helps us to improve the delivery rate of our mailings and minimise wasted expenditure.

06. The legal basis for processing personal data

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that we carry out. This includes information that is processed on the basis of:

- 1. a person's consent (for example, to send you direct marketing by email or to allow us to advocate on your behalf to external services)
- 2. a contractual relationship (for example, applications from OneBodyOneFaith recruitment prospects or current and former employees of OneBodyOneFaith)
- 3. processing that is necessary for **compliance with a legal obligation** (for example to process a Gift Aid declaration, for Health & Safety of volunteers and carrying out due diligence on large donations)
- 4. **OneBodyOneFaith's legitimate interests** (please see below for more information)

OneBodyOneFaith will ask for written explicit consent when recording **sensitive personal data**.

Legitimate Interests

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal





information in ways that are not unduly intrusive or unfair. Our legitimate interests include:

- Charity Governance: including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes.
- Administration and operational management: including responding to enquires, providing information and OneBodyOneFaith services, research, events management, the administration of volunteers, and recruitment requirements
- Fundraising and Campaigning: including administering campaigns and donations, and sending direct marketing by post and via phone calls, sending thank you letters, analysis, targeting and segmentation to develop communication strategies, and maintaining communication suppressions

If you would like more information on our uses of legitimate interests, or to change our use of your personal data in this manner, please get in touch with us.

07. Who has access to your data

We **do not** sell or share personal data to third parties for the purposes of marketing.

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary to perform or maintain our services. They will only use the data in accordance with this Privacy Policy and wider GDPR laws. They do not use any of this data for their own interests.

For instance, when you give consent to receive our e-communications, we use MailChimp to send email newsletters. We occasionally use other service providers to send surveys (e.g.: SurveyMonkey) or invitations (eg: EventBrite). These agents store your data to the extent that it is necessary to perform these functions, in using their service you agree to their T&Cs.

Our website consultants and hosts RussFuss Ltd, F5 Computing, Wix and WV Solutions will have access to your data only for the reasons of administering our website and support. They do not use this information in any other way.





As per Data Protection law, OneBodyOneFaith is required to ensure that all information held on you is accurate. Therefore, we undertake a yearly data cleanse/check of our donations database).

All our website **financial transactions** are handled through our payment services provider, Stripe, PayPal and CAF Donate. Direct Debits are handled through GoCardless and CAF Donate. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

If you would like to see a **full list of OneBodyOneFaith subcontractors** please contact us. We have ensured that all our partner organisations who store data on our behalf agree to a Data Processing Addendum, and we have verified their own data security complies with our own. Therefore, they **cannot** give, sell or rent your information to others for any marketing purposes and they are required to protect your information to the same degree that we do.

We may disclose some information to our **partners** insofar as it is reasonably necessary for the running of our services and for the purposes set out in this policy.

We may share anonymised data on volunteers and guests of our services with organisations who are supportive of our aims, for example funders, partners, volunteers and supporters. No individual is able to be identified from this data.

We may disclose data where it is necessary to protect the vital interests of an individual.

Police or Social Services: there are exemptions within data protection regulations that mean we are under legal obligations to share limited data. This includes the prevention and detection of crime or to prevent benefit fraud.

08. Security

The main bulk of our data is held in our offices on a firewall and password protected server. We (and our service providers) use appropriate technical, organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data. Only employees that need access to a portion of data will be granted it, i.e. only caseworkers will have





access to guest data and only fundraisers/administrators will have access to donor data.

The hosting facilities for our website are situated in Ireland and Amsterdam. Transfers to each of these countries will be protected by appropriate safeguards, namely adherence to the GDPR. All electronic financial transactions entered through our website will be protected by encryption technology.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. However, once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

09. International data transfers outside of the European Economic Area

We use Microsoft Office 365 and Beacon, which are multi-tenant cloud services, to manage and record our supporter personal data respectively. This means that internal documents and information generated by us are stored in cloud services hosted within the European Economic Area (EEA).

However, in some limited cases, we may use data processors that process and/or store data outside of the EEA - for example, payment processors such as Stripe or e-mailing companies like MailChimp.

In these cases, we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your information, for example, by entering into a contract that includes prescribed clauses about the use of data and (if the company is based in the United States, checking that it is accredited under the EU-US Privacy Shield).

In regards to personal data that you submit *for publication* through our website, you acknowledge that it will be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

10. How long does OneBodyOneFaith hold information?





We will retain your personal information for the period necessary to fulfil the purposes in this Notice unless a longer retention period is permitted by law. Different types of information are held for different periods of time in accordance with our internal Data Retention & Deletion Procedure.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc., or any contractual obligation we might have - such as with employment contracts.

Subject to the above, we will typically store data relating to donors and people who have taken campaign actions for seven years after their last donation or interaction, and people to whom we provide services to for six years after the final communication. Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy.

We will not store your credit card details once we have processed a one-off donation.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted.

You can request deletion of your personal information at any time, by contacting our Data Manager or via the details at the bottom of this page.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

Notwithstanding the other provisions of this section, we will retain documents (including electronic documents) containing personal data:

- to the extent that we are required to do so by law;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).





11. Your rights

You have many rights under data protection (GDPR) legislation. These include:

Right of Access

You have the right know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a Subject Access Request (SAR), and can be done by:

Emailing our Operations Manager:

Writing to our Operations Manager,

Right to be informed

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

• Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us.

Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us.





• Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

• Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records please contact us.

Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

12. Amendments and links

Please let us know if the personal information that we hold about you needs to be corrected or updated.

Updates to this policy

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy by email or through the private messaging system on our website.

Links to other websites





The OneBodyOneFaith website may, from time to time, contain links to the websites of other organisations which may be of interest to you. Linked websites are responsible for their own privacy practices. This privacy policy only applies to the OneBodyOneFaith website.

How to contact us and where to raise concerns or complaints

This website is owned and operated by OneBodyOneFaith Ltd.

We are registered in England and Wales under 1048842, and our registered address is: 15 Newland, Lincoln, LN1 1XG.

You can contact us by writing to the postal address given above, by using our <u>website contact form</u>, by email to <u>hello@onebodyonefaith.org.uk</u> or by telephone on 01636 673072.

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To be reviewed: December 2023