

## Light Project Peterborough Privacy Policy

### Purpose

At Light Project Peterborough 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 [info@lightprojectpeterborough.org.uk](mailto:info@lightprojectpeterborough.org.uk) or by writing to Light Project Peterborough, The Garden House, Gravel Walk, Minster Precincts, Peterborough, PE1 1YU. Alternatively, you can telephone 01733 560031.

### How do we collect information from you?

We obtain information about you in the following ways:

- 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, purchase products and services or when you register to receive one of our newsletters.

- Information you give us indirectly
  - Your information may be shared with us by third parties, which might include:
  - independent event organisers, for example fundraising sites like 'Just Giving';
  - professional fundraisers; and
  - subcontractors acting on our behalf who provide us with technical, payment or delivery services, our business partners, advertising networks analytics providers and search information providers.

You should check any privacy policy provided to you where you give your data to a third party.

- When you visit our website(s)

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 our website(s), for example we collect information about pages you visit and how you navigate the website, i.e., length of visits to certain pages, products and services you viewed and searched for, referral sources (e.g., how you arrived at our website(s)).

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

- Social Media

When you interact with us on social media platforms such as Facebook and Twitter 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.

- Public information

We may supplement information on our supporters with information from publicly available sources such as annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a fuller understanding of someone's interests and support. For more information, please see the section on 'Building Profiles' below.

### **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
- information about your activities on our website(s) 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 or make a purchase, 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, in order to continue to promote equality in our employment practices, we ask that each job applicant completes a Recruitment Monitoring Form so that we may assess the effectiveness of our recruitment procedures.

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

### **How and why is your information used?**

We may use your information for several different purposes, which may include:

- providing you with the services, products or information you asked for.
- processing orders that you have submitted.
- carrying out our obligations under any contracts entered between you and us.
- keeping a record of your relationship with us.
- conducting analysis and market research to better understand how we can improve our services, products or information.
- checking for updated contact details against third-party sources so we can stay in touch if you move (see the section on 'Keeping your information up to date' below).
- seeking your views or comments on the services we provide.
- notifying you of changes to our services.
- sending you communications which you have requested and that may be of interest to you. These may include information about campaigns, fundraising appeals and activities and promotions of goods and services; and
- processing job applications.

### **How long is your information kept for?**

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g., health/safety and tax/accounting purposes). We review our retention periods on a regular basis.

### **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. These third parties may include:

- Third parties working 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.

### **Lawful Processing**

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- Specific Consent

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

- Performance of a contract

Where we are entering into a contract with you or performing our obligations under it, like when you buy Light Project Peterborough named products and services.

- Legal obligations

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission or Fundraising Regulator.

- Vital interests

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue which requires us to share your information with the emergency services.

- Legitimate interests

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Light Project Peterborough as a charitable organisation in pursuit of our charitable objects. For example, to:

- send postal communications which we think will be of interest to you
- conduct research to better understand our supporters and to improve the relevance of our fundraising
- understand how people choose/use our services and products
- determine the effectiveness of our services, promotional campaigns and advertising
- monitor who we deal with to protect the charity against fraud, money laundering and other risks
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website(s)

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

### **Fundraising and marketing communications**

We may use your contact details to provide you with information about our work, our fundraising appeals and opportunities to support us, as well as any products and services you can buy, if we think it may be of interest to you.

- Email/text/Phone

We will only send you marketing and fundraising communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by replying to our marketing email with the word "UNSUBSCRIBE".

- Post

We may send you marketing and fundraising communications by post unless you have told us that you would prefer not to hear from us.

### **Your choices**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work

we do and the exciting products and services you could buy, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We are committed to putting you in control of your data, so you are free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time by:

Email: [info@lightprojectpeterborough.org.uk](mailto:info@lightprojectpeterborough.org.uk)

Telephone: 01733 5600631

Writing to: Light Project Peterborough, The Garden House, Gravel Walk, Minster Precincts, Peterborough, PE1 1YU.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

### **Building profiles**

We may analyse your personal information to create a profile of your interests and preferences so that we can tailor and target our communications in a way that is timely and relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. This allows us to be more focused, efficient and cost effective with our resources and reduces the risk of someone receiving information they may find inappropriate or irrelevant.

We are committed to putting you in control of your data so you are free to opt out of your information being used in this way at any time by contacting [info@lightprojectpeterborough.org.uk](mailto:info@lightprojectpeterborough.org.uk)

We may also use your personal information to detect and reduce fraud and credit risk.

### **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:

- Right of access

You have a right to request access to the personal data that we hold about you.

You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, please send a description of the information you would like to see and proof of your identity by post to our office address.

- Right to have your inaccurate personal information corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us, so we continue to work on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or if you believe any of the other information we hold is inaccurate or out of date, please contact us by:

- email to: [info@lightprojectpeterborough.org.uk](mailto:info@lightprojectpeterborough.org.uk)
- in writing: to Light Project Peterborough, The Garden House, Gravel Walk, Minster Precincts, Peterborough, PE1 1YU.
- Telephone: 01733 560031

- Right to restrict use

You have a right to ask us to restrict the processing of some or all your personal information if there is a disagreement about its accuracy, or we are not lawfully allowed to use it.

- Right of erasure

You may ask us to delete some or all your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to. In many cases, we will anonymise that information, rather than delete it.

- Right for your personal information to be portable

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

- Right to object

You have the right to object to processing where we are using your personal information (1) based on legitimate interests, (2) for direct marketing or (3) for statistical/research purposes.

If you want to exercise any of the above rights, please email us at [info@lightprojectpeterborough.org.uk](mailto:info@lightprojectpeterborough.org.uk) or write to Light Project Peterborough, The Garden House, Gravel Walk, Minster Precincts, Peterborough, PE1 1YU. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's Information Commissioner's Office.

### **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. Any sensitive information (such as credit or debit card details) is encrypted and protected. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

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. Where we have given (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **Keeping your information up to date**

We take reasonable steps to ensure your information is accurate and up to date.

Where possible we use publicly available sources to identify deceased records or whether you have changed address.

We really appreciate it if you let us know when your contact details change.

### **Use of Cookies**

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Our website(s) uses cookies to help identify and track visitors, their usage of our website(s), and their website(s) access preferences. Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our website(s), with the drawback that certain features of our website(s) may not function properly without the aid of cookies.

Our website(s) may set and access Cookies on your computer. First-party Cookies that may be placed on your computer are detailed in Schedule 1. All Cookies used by our website(s) are used in accordance with the provisions of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011. We have



Carefully chosen these Cookies and uses them to facilitate certain functions and features of our website(s). Our website(s) also use Cookies for analytics purposes. These Cookies track your movements and activities on our website(s) and are designed to give us a better understanding of our users, thus enabling us to improve our website(s) and our services. Certain features of our website(s) may depend upon Cookies to function and are deemed, within the law, to be strictly necessary. You will not be asked for your consent to place these Cookies however you may still disable cookies via your web browser's settings. You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of Services available on our website(s). You may delete Cookies at any time; however you may lose any information that enables you to access our website(s) more quickly. These Cookies are not integral to the services provided by our website(s) to you and may be blocked at your choosing via your internet browser's privacy settings or via your response to the request for consent. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your browser if you are unsure as to how to adjust your privacy settings.

### Schedule 1

Name of Cookie	Provider Name	Purpose
_ga(SessionCookie)	GoogleAnalytics	<p>These cookies are used to collect information about how visitors use this site. We use the information to compile reports and to help us improve the site.</p> <p>The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.</p> <p>More information can be found by visiting <a href="http://www.google.co.uk/intl/en/policies/privacy/">http://www.google.co.uk/intl/en/policies/privacy/</a></p>

### Links to other websites

Our website(s) may contain links to other websites run by other organisations. This policy applies only to our website(s), 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 those using links from our website(s).

In addition, if you linked to our website(s) 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.

### **16 or under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### **Vulnerable circumstances**

We are committed to protecting vulnerable supporters, customers and volunteers, and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

### **Transferring your information outside of Europe**

As part of the services offered to you through our website(s), the information which you provide to us may be transferred to countries outside the European Economic Area ("EEA"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. You should be aware that these countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

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

### **Legal requirements**

We are committed to compliance with applicable legal and other requirements to which Light Project Peterborough subscribes that relate to this Privacy Policy.