

One to One Children's Fund

Privacy Policy

1. General Statement

The privacy and security of the personal information or data processed by One to One Children's Fund ('the Charity') is important to us and we are committed to protecting such personal and confidential information in compliance with the Data Protection Act 1998, the General Data Protection Regulation and all relevant and subsequent legislation or regulations in force from time to time ('the Regulations') for the data we store both on file and on IT systems.

To discuss any matter relating to how personal data is used, please call us on 020 7317 7040 or email us at office@onetoonechildrensfund.org or write to us at One to One Children's Fund, Hillsdown House, 32 Hampstead High Street, London NW3 1QD. We may be required in certain instances to ask that requests for information be submitted in writing

References to the processing of information includes the collection, use, storage and protection of data. One to One Children's Fund is the 'data controller' for the purposes of this policy, and the policy extends to its staff, trustees, volunteers and anyone else processing data on our behalf from time to time. Any personal data collected by us will only be processed in accordance with this privacy policy.

One to One Children's Fund aims to relieve the suffering, hardship and neglect of children and young persons anywhere in the world through:

1. **The relief of poverty and starvation;**
2. **The advancement of education;**
3. **The relief of sickness and disability;**
4. **The promotion of social rehabilitation;**
5. **Assistance to overcome the trauma of conflict, persecution and natural disaster.**

One to One Children's Fund applies the **Eight Data Protection Principles** to its data processing:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained only for the purpose specified.
3. Personal data kept will be adequate, relevant and not excessive for the purposes required.
4. Personal data shall be accurate.
5. Personal data will not be kept for longer than is necessary for purpose.
6. Personal data will be processed in accordance with the rights of data subjects.
7. Appropriate technical and organizational measures will be taken against unauthorized or unlawful processing of personal data and against accidental loss, destruction or damage to personal data.
8. Personal data shall not be transferred outside the EEA unless that country or territory ensures an adequate level of data protection for the rights and freedoms of data subjects except where consent has been given, for reasons in the public interest, where data is available on a public register or with the approval of the Information Commissioner.

2. Collection of Personal and Confidential Information

Organizations are permitted to process data if they have a legal basis for doing so. One to One Children's Fund processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed; and/or
- One to One Children's Fund has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; and/or
- One to One Children's Fund has a legal obligation to process the data.

One to One Children's Fund may collect personal data when, for example, individuals make a donation, book a place for an event or contact the charity with an enquiry or for other purposes in writing, by email, by phone or via the website.

2.1 One to One Children's Fund collects and uses the personal data provided by individuals for the following purposes:

- To enable the general management and administration of One to One Children's Fund, its events and campaigns.
- To maintain accurate internal records of our engagement with supporters, volunteers, staff and others. These records facilitate our programmes and activities run in accordance with our charitable objects and the ways in which we raise funds and awareness about our work through campaigns and events.
- To process enquiries about the work (as stated above) of One to One Children's Fund.
- To process payment and administration of their donation or ticket purchase.
- To process Gift Aid declarations and claims and maintain a record of the same.
- To notify about important changes or developments at One to One Children's Fund.
- To verify, on occasion, the personal data supplied to ensure it is up to date and accurate.
- To contact individuals by phone or post to promote the aims and objectives of the charity, to request donations, and to market our events and challenges.
- To contact individuals by email to promote our aims and objectives, to request donations, and to market our events and challenges where express consent has been provided for this.
- For staff and volunteer administration.
- To store historical accountancy records for the period set out by law.

2.2 One to One Children's Fund will hold only such personal data as is reasonable and necessary for these purposes and only for as long as is required.

2.3 One to One Children's Fund do not collect or store sensitive data (racial, ethnic, political, religious, health, sexual, judicial) but do store confidential data in the form of Card Payment Records.

3. Use of Personal Data

One to One Children's Fund uses personal data to contact individuals to promote the aims and objectives of the charity, to request donations, and/or to market our events and challenges. As such,

- 3.1 One to One Children's Fund will never conceal its identity when sending marketing messages.
- 3.2 One to One Children's Fund will only send such communications by email or text if an individual has clearly and expressly opted-in to receiving such communications.
- 3.3 One to One Children's Fund will always provide a valid address for marketing opt out and/or an unsubscribe option on every mailing.

- 3.4 Individuals may choose not to be contacted by phone or post by writing to One to One Children's Fund. Individuals may choose not to be contacted by email by unsubscribing at any time.
- 3.5 If an individual asks not to receive marketing communications at all, or modifies their preferences, One to One Children's Fund will keep a record of such requests in order to comply with the individual's wishes.

4. Using Personal Data for positive supporter engagement

It is important to One to One Children's Fund that the engagement our supporters have with us is a positive one. We try to focus our campaign communications for our supporters so they are appropriate, relevant and most likely to be of interest to them based on what we know of their past engagement with us and their preferences. In doing so, we may profile supporters or potential supporters so we are using our resources effectively, which donors consistently tell us is a key priority for them.

- 4.1 When building a profile, we may analyse geographic, demographic and other open source information relating to supporters in order to better understand their interests and preferences. This may include considering publicly available information about, for example, business and professional profiles, or information filed at the Charity Commission, Companies House, Trustfunding.org, LinkedIn or appearing in the press.
- 4.2 We do this because it allows One to One Children's Fund to understand the background of the people who support us and helps us to make appropriate requests to supporters (individuals, charitable trusts/foundations and companies) who may be able and willing to give more than they already do and/or leave us a gift in their will. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.
- 4.3 Supporters can opt out of their personal data being used for profiling and screening techniques by contacting us using the details given above.

5. Disclosure of Personal Data

- 5.1 We will not sell or hire the personal information we collect about individuals to any third parties. We do, however, reserve the right to disclose personal information in certain circumstances to certain third parties as follows:
- To any partners or sub-contractors we may engage to assist us in carrying out activities and services on behalf of the charity where those sub-contractors must abide by One to One Children's Fund's own data protection standards and this Privacy Policy.
 - To sub-contracted event providers to enable the administration and management of the event, where those sub-contractors must abide by One to One Children's Fund own data protection standards and this Privacy Policy.
 - To the individual's bank/building society, credit/debit card provider to process donations and payments on our behalf.
 - To appropriate third party platforms and services that process credit/debit card payments on behalf of the charity.
 - To appropriate third parties for the purposes of verifying personal information and/or creditworthiness (with respect to a donation or other financial transaction.)
 - To trusted partners or third parties outside of the EEA provided that such partners or third parties abide by One to One Children's Fund's own data protection standards and this Privacy Policy.
 - Where disclosure is necessary (i) in response to a subpoena, court order or government request or request by any other appropriate authority; (ii) for the purposes of taking legal action to establish or exercise our legal rights or defend legal claims against us; (iii) to investigate, prevent and/or take other

Board approval needed

action in connection with possible illegal activities, suspected fraud and/or situations involving potential threats or actual harm to the physical safety or mental wellbeing of any persons, including the safeguarding of vulnerable persons; (iv) actual or suspected violations of the charity's data protection policies; or (v) as otherwise required and/or permitted by law or regulation.

6. Data Retention of Personal and Confidential Information

6.1 We will retain personal and confidential information from individuals for a reasonable period in accordance with the purposes for which the data is being processed and for so long as the law requires. As such,

- One to One Children's Fund will regularly review the personal data we hold.
- Where personal data is held for more than one purpose, we will keep such data as is still needed for any of those purposes.
- Information that no longer needs to be accessed regularly, but which still needs to be retained, will be safely archived or put offline.
- Information that has appears to be surplus to purpose will be considered for deletion, archiving, or making anonymous.
- While data may be made inactive and/or inaccessible, One to One Children's Fund may not delete all personal data when our supporter relationship ends. We will retain enough information necessary to confirm that the relationship existed – and that it has ended – as well as such details as may be reasonably necessary for one of the reasons given above.

7. Accessing and Accuracy of Personal and Confidential Information

7.1 One to One Children's Fund will take reasonable steps to ensure the accuracy of the information recorded:

- One to One Children's Fund will update records whenever new information is supplied to ensure personal data is kept up-to-date.
- Where individuals challenge information held about them we will consider whether the information is accurate and, if it is not, we will delete or correct it.
- In those instances where details have been supplied by the individuals themselves, but we are subsequently found to be holding inaccurate personal data, we will not be considered to have breached the fourth data protection principle.

7.2 Individuals are entitled to see the personal information held about them by the charity and they may ask the charity to make any necessary changes to ensure that it is accurate and kept up to date:

- One to One Children's Fund will provide to individuals, on written request, information on what data is being kept on them, and them only, and for what purpose in a permanent, intelligible form. Where a third party places the request the third party will need to provide evidence of this entitlement.
- Individuals wishing to access this information or update details of the information are asked to write to the Office Manager at One to One Children's Fund. One to One Children's Fund will respond to all requests within 30 days of receipt, once the identity of the person making the request has been verified.

8. Security of Personal and Confidential Information

8.1 One to One Children's Fund have organisational measures in place designed to protect the personal and confidential information of individuals. We will use all reasonable measures to protect information from damage, loss or misuse. As such we have adopted an information security policy which includes:

- Physical security (fob access is required to building, code access to floor, key access required to office)
- Printed security (All personal information in printed format will be stored in locked filing systems and be available only to staff who require access to this information in order to undertake their work.)

- Electronic security (IT firewalls, password protection on files and server access)
- Continuity/disaster recovery plan (One to One Children's Fund takes regular back-ups of its computer data files and this is stored away from the office at a safe location)
- Training staff on security systems and procedures
- Staff being bound to the organisation's policy on Confidentiality, where breach of this policy or others related to information management and data protection constitute a disciplinary offence.
- Investigating breaches of security should they occur.

In the unlikely event that there is any kind of a breach of our duties and obligations under this policy or the Data Protection laws, we will take immediate steps to isolate and rectify the problem. Should the breach be serious one (where there is a risk of, for example, discrimination, damage to reputation, financial loss or loss of confidential information) we have a duty to report that matter to the individuals affected and to the Office of the Information Commissioner.

Further information about Data Protection and privacy laws and individuals' rights can be obtained by visiting the Information Commissioner's website at: <https://ico.org.uk/for-the-public>.

9. Web browsing and Cookies

- 9.1 A cookie is a small file which asks permission to be placed on a computer's hard drive. Once an individual agrees, the file is added and the cookie helps analyse web traffic or when a particular site is visited. Cookies allow web applications to respond to an individual user. The web application can tailor its operations to their needs, likes and dislikes by gathering and remembering information about their preferences. Overall, cookies help One to One Children's Fund provide visitors with a better website, by enabling us to monitor which pages they find useful and which they do not. A cookie in no way gives us access to their computer or any information about them, other than the data they choose to share with us.
- 9.2 One to One Children's Fund may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to visitor needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 9.3 Visitors can choose to accept or decline cookies. Most web browsers automatically accept cookies, but users can usually modify their browser setting to decline cookies if they prefer. This may prevent visitors from taking full advantage of the website.
- 9.4 We may also collect and store information about a visitor's browsing device, including, where available, their IP address, operating system and browser type. This is anonymous statistical data about browsing activities and patterns and does not contain any personal data.
- 9.5 One to One Children's Fund website may contain links to other websites of interest. However, once a visitor has used these links to leave our site, they 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 they provide whilst visiting such sites and such sites are not governed by this privacy policy. Visitors should exercise caution and look at the privacy policy applicable to the website in question.

10. Destruction of Personal and Confidential Information

- 10.1 Manual destruction of files, records and computer printouts containing sensitive data and confidential information will be carried out in a secure manner (e.g. security shredding.) Personal and confidential information provided by electronic means will be deleted from the charity's systems on a regular basis.