

INTRODUCTION

WTRRP is a charity working to assist asylum seekers, refugees and others without recourse to public funds. To find out more about us, see <http://wtrrp.org.uk/our-vision/>.

The law on data protection changed in May 2018, when the new EU-wide General Data Protection Regulation (GDPR) came into force. This new regulation gives you greater control over how information about you is stored and used by organisations like WTRRP. We have undertaken an audit of all the personal information we hold at WTRRP, and put into place new processes and systems to make sure we are working in line with the regulations. This policy is part of that process.

If you have any queries about our privacy policy please email info@wtrrp.org.uk or call us on 01923 252434. Please note that this policy may be updated from time to time, and we will ensure that the latest version is always available on our website.

WHO ARE WE?

WTRRP is a charity registered in England (Number 1162226). Our registered office is at WTRRP, 128 Langley Road, Watford WD17 4RR.

For the purposes of this Policy, 'us', 'we' and 'our' refer to WTRRP.

WHAT IS THIS POLICY ABOUT?

WTRRP is committed to protecting your privacy and the personal information you provide us with. It is important to us that you have confidence in us as an organisation, and that you trust us to look after your information. This policy explains how we collect, use and store your personal information, and also explains the rights you have under the 2018 regulations.

At WTRRP, we have relationships with different people, including clients, supporters and volunteers. For each type of relationship, we collect different personal information and this data might be used and stored in different ways. We have created specific privacy notices providing more detailed information as to how we process your information, depending on the particular connection or relationship you have with WTRRP. These privacy notices are in the appendix at the end of this policy.

YOUR RIGHTS

Under GDPR, you have eight specific rights in law concerning your personal information.

1. The right to be informed- meaning you should be given clear information about what personal information we keep, why we keep it and how it is used and stored.
2. The right of access- meaning you can ask us for a copy of all the personal information we hold about you and you can ask us questions to make sure that we are processing your information legally.
3. The right to rectification- meaning that if the personal information we have is wrong or incomplete, you can tell us so that we only keep accurate information that you have chosen to share with us.
4. The right to erasure- meaning that you can ask us to erase all your personal information. This is sometimes known as 'the right to be forgotten'. There are some occasions when we may have a legal obligation or legitimate interest to keep certain information about you, even if you no longer want to be on our records, for example in terms of processing financial information, or keeping records in case of a future claim.

5. The right to restrict processing- meaning that you can ask us to keep your information but only use it for certain purposes, for example you may want to only receive certain types of information from us.
6. The right to data portability- meaning that you can ask for your data to be transferred to another system. This is not something that is currently relevant to our work at WTRRP, but an example would be if you use a price comparison website to compare different bank accounts, you have the right to tell your current bank to share relevant information with another account provider.
7. The right to object- meaning that if you are unhappy with the way we have processed your data, for example if we keep writing to you when you have asked us not to, you can tell us and we must respond.
8. Rights in relation to automated decision making and profiling- meaning that we need to tell you if we use any systems which automatically use your personal information without human involvement. There is more information about this and all the other rights on the Information Commissioners Office website [here](#).

WHAT INFORMATION DO WE COLLECT?

We collect personal information, or data, each time you interact with us. For example when you are referred in to our service for support, when you make a donation, request information, apply for a volunteer opportunity, sign up for an event, provide feedback or otherwise provide your personal details.

We collect information from third parties, for example fundraising sites like BT MyDonate or from referral agencies, where you have given your consent. You may wish to check the privacy policies of these organisations to find out more information on how they will process your data.

When you visit our website, we collect non-personal data such as details of pages visited and time and location data. Website usage information is collected using cookies (see the section on Cookies below).

We may collect publicly available information, for example from Companies House, Charity Commission, or information published in newspapers.

WHAT DO WE DO WITH YOUR INFORMATION?

More detailed information is given in the privacy notices at the end of this policy.

Clients – we may use the personal information we collect from you (and / or the organisation who referred you) to:

- arrange an initial contact meeting to understand your situation and find out whether we are able to offer you support
- provide you with any services (financial, education or support) we have agreed with you
- share information with other organisations, for example with your original referrer, or with legal or medical services

Our use of your information is always subject to our confidentiality policy and your Befriender or Drop-in contact will explain this to you.

Supporters – we may use the personal data we collect from you to:

- keep you up to date with news and stories about our work
- process any donations you give to us including claiming gift aid on your donations if authorised by you to do so
- thank you for your donations and invite you to continue to support us financially and non-financially, for example through volunteering or praying
- provide you with any information you have requested

- keep a record of your relationship with us

We will always do this in compliance with our own Fundraising Commitment and with rules set out by the Fundraising Regulator.

Volunteers and volunteer applicants - we may use the personal information we collect from you to:

- process and consider your application for a role at WTRRP. Your information will only be shared with our members involved in the recruitment process
- share specific and appropriate elements of your personal data, for example, your contact details and past experience with other WTRRP members that you will be working with should your application be successful.

This personal information may include your contact details, past experience, DBS information, references (we only seek references once we have confirmed we are proceeding with your volunteer application), and information relating to your activity with us.

SHARING YOUR INFORMATION

Sometimes we may need to share your information, with your consent. We may also have to share information if it is required by a law enforcement agency or by a regulatory body, for example the HMRC for processing gift aid on donations. **We do not share your information with any other organisations for their marketing purposes.**

We may use other organisations to carry out tasks on our behalf, including processing donations (for example we receive online donations via MyDonate), sending emails (such as using Mailchimp to send our newsletters) and sending text messages (for example, to send client appointment reminders). We will provide these organisations with only the information needed to deliver these services, and they are not permitted to use or store your data for any other purpose.

We may share your information internally, within the WTRRP team, for the purpose of safeguarding, or for example if a member needs to query something with you.

WHERE AND HOW DO WE STORE YOUR PERSONAL INFORMATION?

We take appropriate steps to ensure your personal information is managed securely. We store and process most of our information using cloud based systems and secured servers. Internally, this is accessed only by appropriate volunteers who are trained suitably. We restrict access to certain computer drives and files, for example information relating to clients' requirements, or financial giving.

Some of your information may be stored in hard copy (on paper), for example if you have given us a photocopy of any personal documentation, or signed copies of formal paperwork. We do our best to keep paper copies to a minimum and we store hard copies of these documents in locked filing cabinets with restricted access.

In some cases, third parties may have access to your personal information, and where this is the case we ensure that they are GDPR compliant. Our IT system is managed and supported by a company called Box.com (UK) Ltd, who have administrator rights across our IT system. They have their own privacy policy and are fully compliant with GDPR.

We may use external companies to collect or process personal data on our behalf, for example Wordpress who provide our website. While we take appropriate steps to ensure that information is secure, for example by using encrypted forms, we cannot guarantee that transmission of information over the internet is fully secure: therefore you submit data at your own risk.

Data in cloud based systems may be processed outside of the European Economic Area (EEA). By submitting your personal data, you agree to this transfer, storing and processing of your information.

COOKIES

Cookies are text files that are placed on your computer by websites that you visit. You can find more information about cookies here (www.aboutcookies.org). Most browsers allow you to turn off the use of cookies function, should you wish to.

Cookies may be used to collect information about your visit to our website, for example: the pages that you visit, the time and date of your visit, location and traffic data.

We may collect and use this data for the following reasons:

- To understand the interests and needs of those who visit our website
- To estimate our audience size and patterns
- To support the processing of forms, applications or requests you send to us
- To help us improve and update our website

WTRRP also uses third party suppliers such as Facebook, Twitter, Mailchimp, Vimeo and they may use cookies. We do not control these, and we would advise you to check with these third parties for information about their cookies and how to manage them.

Some of these third parties may be located outside of the UK and the European Union, and therefore they may not fall under the jurisdiction of UK courts. If this is a concern to you, you can change your cookie settings and you can find out more about this from the Information Commissioner's Office (ICO) (<https://ico.org.uk/>).

LINKS/OTHER WEBSITES

This privacy policy only applies to WTRRP. The WTRRP website contains links to other websites, which are run by other organisations. WTRRP is not responsible for the privacy practices of other organisations, and as a result of this you should read their privacy policies with care.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will keep your personal information only for as long as we consider it necessary. We have to take into account legal obligations, for example we are obliged to keep details of anyone making a financial donation for 7 years after the gift (and share those details to the HMRC if this is gift aided), accounting and tax considerations and also consider what is reasonable for the activity in question. If you have any questions about this, please contact us in writing using the contact details at the bottom of this Privacy Policy.

We only hold volunteers' data for as long as is necessary. If your application to volunteer is unsuccessful or withdrawn your data will be destroyed 6 months after that decision. If you join us as a volunteer your data will be held for the duration of your time as an active volunteer on our database and for six years afterwards (in case you ask for a reference or want to re-activate your volunteer status in changed circumstances).

UPDATING YOUR DETAILS AND PREFERENCES WITH US

Please keep your details up to date with us, for example if you change address or telephone number. When you provide us with personal information, we may use the Royal Mail's Postcode Finder or other available sources to confirm this, for example if we are unsure of what you have written on a form. We do not use these sources to access data that you have chosen not to provide to us.

You can change your preferences for which communications you receive from us, and how we contact you, by getting in touch with us at any time, at the phone, email or postal address below in the How to contact us section.

ACCESSING AND AMENDING YOUR INFORMATION AND PREFERENCES

At any time, you can do the following:

- ask for a copy of the personal information we hold about you (this is also known as a Subject Access Request – please see the Appendix for our SAR policy)
- ask us to erase or remove all your personal information
- ask us to restrict how we use your personal information
- object to our use of your personal information

Your request needs to be in writing either on paper or in an email. The more detail you are able to include the better we'll be able to respond.

To do any of these, please write to us at the phone, email or postal address below in the *How to contact us* section

We will act on any requests received within one month of receiving your request, unless this request is complex, in which case we will inform you within one month of receiving your request and explain why we need to extend this length of time.

VULNERABLE PERSONS AND CHILDREN

WTRRP takes seriously the importance of identifying and supporting people who are known to us and who may be in vulnerable circumstances. WTRRP members are trained to do this appropriately in accordance with our Safeguarding policy. If you wish to view a copy of this document, please contact us.

We only support adults aged over 18. We do not actively seek to collect children's data. If you are a WTRRP supporter and are aged 16 or under we ask you to please gain the permission of a parent or guardian before you provide WTRRP with any personal information.

HOW TO CONTACT US OR MAKE A SUBJECT ACCESS REQUEST

Please contact us if you have any questions about our privacy policy or information we hold about you.

By email: info@wtrrp.org.uk

By phone: 01923 252434

By post: Data Protection Officer, WTRRP, 128 Langley Road, Watford WD17 4RR.

For more information about your rights in relation to the information we hold about you, you can visit the ICO website (<https://ico.org.uk>).

For a subject access request, please include in your request specific details of the data you wish to see. We may need to contact you for further details if insufficient information is contained in the original request. Requests may be made by you personally or by a third party (e.g. a solicitor acting on your behalf). We will request evidence that the third party is entitled to act on your behalf if this is not provided at the same time as the request is made. Before supplying the data (where appropriate) we may contact you asking for proof of identity. You must produce this evidence for your request to be complied with.

We will act on any requests received within one month (30 calendar days) of receiving your request, unless this request is complex, in which case we will inform you within one month of receiving your request and explain why we need to extend this length of time. Wherever possible we will ensure you receive the information requested, in writing, and within 30 calendar days.

Your request will normally be complied with free of charge but if the request is manifestly unfounded, excessive, or if it is repetitive, or if you request further copies of the same information a fee may be charged. The fee charged will be based on the administrative cost of providing the information requested.

In rare cases we may refuse a subject access request; if it is manifestly unfounded or excessive, or if it is repetitive. In these circumstances, we will write to you without undue delay and at the latest within one month of receipt to explain why we are unable to comply. You will be informed of the right to complain to the Information Commissioner and to a judicial remedy.

ABOUT THIS POLICY

Our Privacy Policy may be amended and updated, and so you may wish to check it whenever you share personal information with us. If we do amend this privacy policy, the most recent version of it will always be available on our website. We may not explicitly inform our users of these changes.