



# Privacy Policy

## At a glance

This policy sets a framework for the principles of Privacy policy.

## Who this policy applies to

This policy applies to all members of staff who work under a contract of employment with Harry's Rainbow, volunteers and members of the Board, stakeholders, and service users.

## Policy status

This policy is owned by the Board of Trustees. It is non-contractual and may be updated or changed by the Board at any time. Colleagues are reminded that it is their responsibility to keep up to date with policy changes.

At Harry's Rainbow we value the beneficiaries we support, our staff and our volunteers. We take your privacy seriously, and as such we treat all data we receive in the strictest confidence.

We endeavor at all times to comply with the EU General Data Protection Regulation (GDPR), the Privacy and Electronic Communications Regulations (PECR) and other relevant legislation.

This policy explains how we collect and use the personal information you provide to us, and your rights in relation to that information. By using our website, any of our services, or providing us with any personal information we will assume you are agreeing to your information being used and disclosed in the ways described in this policy.

Owner: Odette Mould	Reviewed/Approved date: 05/01/2022
Approved by: The board	Review Date: 05/01/2023



## Privacy Policy

### How do we collect personal information?

We collect data and process data when you:

- Complete a contact form online on our website, for example, a Registration Form
- Complete an online or printed booking form, for example to book a stay at our Rainbow Retreat or a trip
- Complete an online or printed questionnaire
- Discuss your enquiry with a member of staff, for example our Family Liaison Officer
- Use or view our website via your browser's \*cookies

We also receive personal information indirectly, from the following sources in the following scenarios:

- fundraising platforms such as JustGiving or Virgin Money or a ticket selling organisation such as Eventbrite.
- Referrals made on your behalf such as from schools

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### What personal information do we collect, why do we collect it and how do we use it?

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting [odette@harrysrainbow.co.uk](mailto:odette@harrysrainbow.co.uk) OR [dataprotection@harrysrainbow.co.uk](mailto:dataprotection@harrysrainbow.co.uk)

***We have listed below the types of identifiers and the personal information we may request and hold***

#### **Beneficiaries**

The data collected and stored from our beneficiaries is used by Harry's Rainbow for our records and to assist us with providing, assessing, and measuring the support we provide, and for administration of our activities. This information includes;

- For the main registrant and additional adults (i.e., parent/care giver): name, address, date of birth, other personal identifiers, special category data, email address, telephone number, characteristics, ethnicity, any other data relevant to the purpose of registration
- For the child or young person: name, address, date of birth, characteristics, ethnicity, disabilities and additional needs, school, and activities attended, support provided and any other data relevant to the purpose of registration and support thereafter
- For the deceased: name and date of birth, the cause of death and other relevant information to help us ascertain the support needs of the family.

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- Information contained within surveys and evaluation forms for the purposes of assessing support needs, signposting, and making referrals, with consent and evaluating impact

Where we are providing activities, we may record dates of any short break booking, transport booking details, bank account information and information for any additional family members attending. Some of this data may be passed onto third parties, for example: the activity venue or transport providers, with your consent.

Where we have discussed referrals or signposting, to partner or other organisations it may be necessary to pass on some of your data, with consent, for example: Arthur Ellis, Ride High.

### **Referrer**

In some cases, we receive referrals for our services for potential beneficiaries who have lost a family member. This might be from a school, friend, social services, charity, or other official bodies.

Information collected in these instances include:

- Name, email, telephone number of potential beneficiary.
- Address, if consent is given by referred.
- Additional personal details on why support is required.

### **Supporters (Fundraisers, Donors, Heroes, Corporate)**

We are indebted to a range of people who devote their time, energy, and money to supporting our charity. In the course of our work with such volunteers, we hold personal information which is used to contact you about events you are involved in, volunteering opportunities and fundraising activities, or to otherwise communicate with you regarding your support of the charity.

This information can include:

- name, address, email, telephone number, date of birth, signature, consent disclaimer, and details on activity being undertaken, survey and questionnaire responses and any other data relevant to the relationship between the person and the charity

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### **Subscribers to our newsletters**

Your data will be stored for us to contact you from time to time, providing you with updates on our work, our events, and fundraising activities. This information includes:

- name, address, email, consent to receive newsletter by email and /or post

### **School data**

The support we provide extends to schools and as such we may store:

- Contact details for the school, specifically name and address, email address for main contact and telephone number, information about meetings held and resources provided
- Referral contact information (see referrer)

### **Photography & Videography**

Photographs and videos taken of our beneficiaries and volunteers are included within the definition of personal information. Harry's Rainbow will only use photos taken by employees, volunteers and Trustees or their authorised agents, unless otherwise consented and agreed. Permission to take photos and video is sought at point of registration for beneficiaries as well as at the point of the material being taken. Consent is requested of any stakeholder before material is taken. Photographs and videos may be used on our website and social media channels (such as Facebook, Twitter, and Instagram) and/or in our printed literature or by the media (including newspapers and broadcast media) for the promotion of our service.

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### How do we protect and store your personal information?

- Your data is stored electronically and in some cases on paper files.
- All data is stored in a locked cabinet and electronic files are password protected.
- This data is accessed and used by authorised persons within our organisation and is only shared outside of Harry's Rainbow if we are: providing transport or an activity provided by an external agency, making a counselling referral OR unless there is a risk of harm to the child and/or others in which case we will refer to our Child Protection Policy.
- Our Data Protection Policy outlines further details on how our staff and volunteers are expected to maintain your data and confidentiality

### How long will you keep my information?

We will not keep your personal information for any longer than is necessary for our charity's purposes or for legal requirements. Our Data Retention Policy outlines how long we keep specific data for, considering regulations and business need.

### Your legal rights

Under the General Data Protection Regulation (GDPR), you have the following rights:

- the right to be informed
- the right to access your personal information
- the right to edit and update your personal information
- the right to request to have your personal information deleted
- the right to restrict processing of your personal information

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- the right to data portability
- the right to object - including automated decision making and profiling
- the right to lodge a complaint with a supervisory authority

If you wish to exercise your rights, please contact us using the details below.

### How can you access, amend, or remove your personal information?

To request a copy of the information we hold about you, provide or withdraw consent, or make a complaint about how we have handled your personal data please contact us.

You can email our data controller at [dataprotection@harrysrainbow.co.uk](mailto:dataprotection@harrysrainbow.co.uk) or contact us at:

The Data Protection Officer  
Harry's Rainbow  
7 Warren Yard, Warren Park  
Wolverton Mill  
Milton Keynes, MK12 5NW

We will request proof of your identity, to ensure we do not pass personal information to anyone else other than the person making the request. We will complete your request within 1 month.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113

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## Privacy Policy

### \*Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our website, we may collect information from you automatically through cookies or similar technology. For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

#### How we use Cookies

We use Google Analytics tracking cookies to collect anonymous traffic data about your use of this website.

This information is stored by Google and subject to their privacy policy, which can be viewed here: <http://www.google.com/privacy.html>.

Google Analytics collects information such as pages you visit on this site, the browser and operating system you use, and time spent viewing pages.

The purpose of this information is to help us improve the site for future visitors.

The social plug-ins for Twitter and Facebook at the bottom of this page may also set or retrieve cookies on your device, if you are logged in to these websites, or have previously downloaded cookies controlled by these sites.

### Privacy policies of other websites

The Harry's Rainbow website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

### Changes to our Privacy Policy

We may update this privacy statement from time-to-time by posting an updated version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy statement by email.

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