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Introduction

We want everyone who supports us or who comes to us for support to feel confident about how any personal information that they share will be looked after or used.

This Privacy Policy explains in detail the types of personal information we may collect about you when you interact with us. It also explains how we'll store and handle that information, and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how City Hearts uses your information. We hope the following sections will answer any questions you have but if not, please do get in touch with us. It's likely that we'll need to update this Privacy Policy from time to time, so you're welcome to come back and check it whenever you wish.

City Hearts UK is registered with the Information Commissioner for the United Kingdom. Within the UK and EEA our processing and retention of personal information is governed by the Data Protection Act 1998 and related legislation. However, our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements.

These are our main Privacy principles:

- We will only use personal information in the ways we need to and that is expected;
- We will only use your personal information if you have authorised us to do so;
- We will not release your information to other organisations for marketing purposes;
- We will be very careful when engaging with vulnerable people or those who we think may be vulnerable;
- We will take reasonable care to keep your information safe through secure processes;
- We will keep you up to date with our work including how we are campaigning to improve the situation for victims of Modern Slavery; raising awareness and promoting understanding of Modern Slavery; as well as for the purposes of fundraising;
- We will make it simple for you to tell us how you want us to communicate with you, including how to opt out from future communications, and we will deal with your request as soon as possible;
- We will make it easy for you to contact us to answer any questions about privacy or our data protection policy; and details of how to contact us are contained within this policy.

When do we collect personal information about you?

We may collect personal information from you as a supporter, or because you are accessing the services of City Hearts. There are lots of ways that we collect information about you. These are the most common ways.

- When you visit our website;
- When you engage with us on social media;
- When we are providing support to you and/or are working with other organisations to provide support to you and/or advise about a case of Modern Slavery;
- When you have contacted us by any means because you have made an enquiry about what we do, you want to be a supporter, volunteer or are applying for a job with us;
- When you or another organisation is asking for advice on your behalf;
- When you are registering with us for a campaign or making a donation;
- When you provide feedback to us or otherwise provide us with personal information.

What sort of personal information do we collect?

We collect three main types of data:

- **Personal information** that supporters and service users submit so that we can provide you with a service as a client or supporter;

The personal information we collect might include but not be limited to your contact details such as name, date of birth, email address, postal address, and telephone number, as well as information you provide in any correspondence between us.

As staff and volunteers, you are required to provide copies of documents to prove your age and identity where the law requires. This will include your passport and driver's licence which includes your date and place of birth, gender, address and facial image.

- **Financial information** that supporters voluntarily submit, to make a donation;

The **financial information** we collect might include your credit/debit card or banking details if you are making a donation. We use "Giving Cards" to collect this information at events. This information is then processed by City Hearts staff using an online service *Payment Sense*.

We process donations through our website, using the third party company *Charity Checkout*.

For fundraising campaigns, we hold accounts with and recommend third party companies *Just Giving* and *Virgin Money Giving*.

- **Anonymous information** that is collected from service users, supporters or other agencies who we may interact with;

We may also collect information if you tell us about your Modern Slavery or life-controlling issue experience or the experiences of a friend, relative or person you are supporting. This might include information on your legal and support needs. You can decide if you want to remain **anonymous** or if you are happy to share your personal details.

We use *Google Analytics* to gather general information about the use of websites, such as which pages users visit most often. We may also track which pages users visit when they click on links in City Hearts emails that are generated and sent through *Mail Chimp*. We may use this information to personalise the way we communicate with you, to make improvements to our website and to ensure we provide the best service for users.

How and why do we use personal information?

We may use your personal information to:

- Provide you with the advice and support that you have asked for. This could be advice after being identified as a victim of Modern Slavery or having a life-controlling issue, advice through our publications or other services, or advice given to third parties about an individual;

- Provide information to you about what we are doing. This may include letting you know about services we offer now and hope to offer in the future; providing you with information which may be of interest to you, news and events; and/or providing you with fundraising updates. We will do this with your consent and you can change your mind and remove or add your consent at any time by contacting us;
- Analyse so that we can better understand trends in the issues our service users face - including but not limited to Modern Slavery, understand your needs as a service user, and understand supporters' needs. This then informs our wider internal and external practices, legislation, policies and procedures;
- Disclose if we are required to do so by law (for example to comply with applicable laws, regulations, codes of practice or in response to a request from a competent authority); or in order to enforce other agreements.
- Provide or administer all activities related to the work we do including updating you with important information; help identify you when you contact us; and to help us maintain appropriate records;
- Improve our work with you. We may use your information to improve our services to you, to fulfil gift aid declarations (UK only), to improve our information and communications or to make our website better to service your needs;

Sensitive Personal Information

If you contact us for advice by telephone or email about your situation you may provide information which is very sensitive. We will use this information for the purposes of dealing with your enquiry; training; quality-monitoring; evaluating the services; including support gaps which then informs changes to policy and law which need to be made.

We will not pass on your personal details to another person without your permission except in exceptional circumstances. Examples of this might be if you report serious issues such as self-harm, and/or you pose a threat to yourself or others; to prevent or detect crime, including if you disclose to us other victims in the same situation as you; or if we are required to do so by law, for instance if the court orders us to disclose information. Additionally, we can process and pass on your personal information without consent if the information is anonymised.

If you provide us with sensitive personal information by telephone, email or by any other means we will treat this information with extra care and in accordance with this Privacy Policy.

Who do we share your personal information with?

The personal information we collect about you may be looked at by staff and volunteers on a 'need-to-know' basis, so that we can best know how to help you and deliver services to you, all of whom are DBS checked and have signed non-disclosure agreements as a condition of employment. We also work with other organisations that assist us or act on our behalf to deliver services. Additionally, we may have to disclose your personal information to legal, statutory or regulatory authorities if required to do so by law.

This never involves us selling or sharing your personal information with organisations so that they can contact you for any marketing activities.

How do we protect your personal information?

We take the security of your personal information extremely seriously.

We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss. We will take all reasonable steps to protect your personal information, but information can never be guaranteed as 100% secure. Please note that we will not be liable for any breach of security unless we have been negligent;

Our website may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. If in doubt, please check their security and privacy policies.

How long will we keep your personal information?

Your personal information and details of the enquiries received are stored securely and no longer than is reasonable and necessary for the purposes of its use.

At the end of the appropriate retention period we will securely delete your personal information.

International Information Transfer

We may transfer the personal information we collect about you to recipients (including our global offices) in countries other than the country in which the information was originally collected, including but not limited to the countries we operate in which are UK, Germany, Ghana and Kuala Lumpur. Those countries may not have the same data protection laws as the country in which you initially provided the information.

When we transfer your information to other countries, we will protect that information as described in this Global Privacy Policy or as otherwise disclosed to you at the time the information is collected (e.g. via a privacy notice). City Hearts is an international organisation so we may need to transfer your personal information among several countries including those as detailed above. We will endeavour to comply with applicable legal requirements and provide adequate safeguards for the transfer of personal information to countries outside the European Economic Area (EEA) or Switzerland.

What are your rights and how can you update and access your personal information?

We value you whether you are a supporter or service user. We always like the opportunity to keep you updated with our progress, plans and how you can support us. Where you have given your consent, we would like to keep in touch by the means by which you provide the means – this may be by post, telephone, email, text and any other electronic means.

It's important for you to know that you have the right to request at any time:

- Access to the personal information we hold about you, free of charge in most cases;
- The correction of your personal information when incorrect, out of date or incomplete;
- That we stop using your personal information for direct marketing.

You can contact us at any time, to update your details, or request a copy of your personal information we hold, by contacting City Hearts:

- In writing – To the Data Protection Officer at City Hearts, The Mega Centre, Bernard Road, S2 5BQ. United Kingdom.
- By telephone – (+44) 0114 213 2063
- By email – dataprotection@cityhearts.global

We respect any information that you share and you can change your mind and remove or add your consent at any time by contacting us at dataprotection@cityhearts.global or following the unsubscribe instructions on communications you receive.

Please also contact our data controller using the information above if you require any further information about our confidentiality or data protection policies.

Changes to our Privacy Policy

Our Privacy Policy is reviewed regularly to ensure that it reflects the most up to date law and to evaluate how information is used. We will notify you of any changes that result from updating this policy, so please check our website to see if there have been changes which may affect you.

This Privacy Policy was last updated on: 18th May 2018