## **Privacy Statement**

#### About us

This is the privacy statement of Saheli Hub a charity (1153202) and limited company (08373929) whose main office is 110 Edward Road, Balsall Heath, Birmingham B12 8LF. We are registered with the Information Commissioner's Office (ZA222468). Our email address is <a href="mailto:info@saheli.co.uk">info@saheli.co.uk</a>.

# **Privacy Policy**

We understand the importance of maintaining your privacy, keeping your personal information secure and complying with data protection laws.

We are the data controller of any personal information you provide to us. This means that we are responsible for complying with data protection laws. This privacy policy describes what personal information we may collect from you, why we use your personal information and more generally the practices we maintain and ways in which we use your personal information.

By providing your personal information to us, you acknowledge that we may use it in the ways set out in this privacy policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information. We may also give you the ability to opt-in or opt-out of selected uses such as fundraising and promoting the interests of the charity when we collect your personal information.

We may collect information from you about other people, for example family members. If you give us information about another person, it is your responsibility to ensure and confirm that:

- you have told the individual who we are and how we use personal information, as set out in this privacy policy notice.
- you have permission from the individual to provide that personal information to us and for us to use it, as set out in this privacy notice.

Our Privacy policy is divided in 13 sections to help you concentrate on the area you are interested in.

- 1. Why we need it and how we use your personal information
- 2. Nature of personal information
- 3. How we collect your personal information

- 4. Sharing information
- 5. Marketing
- 6. How we protect your personal information
- 7. How long we keep your personal information
- 8. Data transfer outside the UK
- 9. Your rights
- 10. Your right to complain to the Information Commissioner's Office
- 11. Other websites
- 12. Cookies
- 13. How to contact us

# Section 1: Why we need and how we use your personal information

We only collect and store your information where we have a lawful grounds and legitimate reasons to do so. We collect, use and store your personal information in order to allow you to access our services. We record basic information about who you are, where you live, why you are accessing our services.

The use of your data is essential for some of our services to enter into a contract with us.

We may monitor emails and other communications with you and when you contact us, we will keep a record of that correspondence and any information provided to us in that or subsequent communications.

Under data protection laws, for each purpose we must be able to rely on a legal ground to justify why we are using your (non-sensitive) personal information. The legal grounds that we may rely on are:

Consent of the individual	You have provided informed and unambiguous consent for specific data processing purposes
Performance of our contract with you	Processing is necessary for the performance of a contract that you are party to or in order to take steps at your request prior to entering into a contract
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject

To protect your vital interests or those of another person	Processing is necessary where we believe you or another person is at risk
For our legitimate interests where these do not cause you undue harm	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal information.  Our main legitimate interests for using your personal information are:  to enable us to provide and deliver services  to promote our work and services for the purposes of fundraising

When we use your sensitive personal information (for example, details about your health) we must be able to rely on an additional legal ground. The additional legal grounds that we may rely on in these instances are:

For Processing sensitive personal information		
For Processing sensitive personal information		
Your explicit consent	You have given your explicit consent to the processing of your sensitive personal information for one or specified purposes. You may withdraw your consent at any time by contacting us. if you do so, you may not be able to receive the benefit of some of our services where in order to provide them, we rely on your explicit consent to process your sensitive personal information	
Necessary to protect the vital interests of the data subject or another person	Processing is necessary where we believe you or another person is at risk	
Where it is necessary to consider your	It may be necessary to process	
medical condition when providing	sensitive data where we need	
services	understand more about your health in order to provide our services	
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity	
You have made this information public	You have made your sensitive personal information manifestly public.	

## **Section 2: Nature of personal information**

Personal information is any information that may identify a living individual. We collect personal information such as name, email addresses, date of birth, financial details, IP addresses, depending on the nature of the service we are providing.

We may collect, use and store sensitive personal information so called special categories of data such physical or mental conditions, racial or ethnic origins, (for example if we are required to collect this information as part of our recruiting process) and your religious beliefs as necessary in relation to providing our services to you. This information may be shared with other agencies and third party service providers. Where necessary we shall obtain your consent to the processing of such information.

We may collect information from:

- Present, past and prospective clients
- Employees from other agencies we work with when delivering services (for example referrals)
- Users of our website

We might collect your information if:

- you ask to be part of any fundraising or marketing campaign
- you register (or someone on your behalf registers you) to attend one our events or training courses
- You enroll in one of our programmes
- you apply for an advertised employed role
- you approach us in relation to any of the services it offers
- you use our website (for more information please see section12 on Cookies)

Where you have registered for an event or training hosted by us we will use your personal information to:

- process bookings
- send you the relevant information relating to the event
- include your name on delegate lists and registers which are available to other delegates (unless you have indicated to us that you do not want your details to appear on such lists) and third parties such as event organisers
- to produce name badges
- for security, catering and to make other necessary purposes related to running of our events

## Section 3: How we collect your personal information

We may collect your personal non-sensitive personal information and sensitive personal information:

- face to face (directly form you)
- by telephone
- by email
- via our website (including through cookies please see section 12 on Cookies)
- via forms including payment and direct debits
- via our management information systems
- from partner and local authority agencies with whom we work.

# **Section 4: Sharing Information**

We may disclose your information to the Third Parties listed below for the purposes disclosed in this privacy policy. You can contact us for details of specific disclosures made in respect of your personal information. The third parties listed below will only use your personal information under strict instruction and are under an obligation to ensure where appropriate security measures are in place.

- Specific organisations where we are in a partnership to deliver contracted services
- IT Service Providers
- Professionals who are engaged to facilitate the delivery of services
- Local Authorities
- Health services
- · Regulators and official bodies

We may also disclose your personal information to other third parties where:

 the disclosure is required by law or by a regulator who has authority over us or you, such as where there is a court order or statutory obligation.

We never share your information outside our organisation for marketing purposes.

#### Section 5: Fundraising and promoting our interests

We are committed to only sending you communications relating to fundraising and the promotion of our interests if you have expressed an interest in receiving. These may include:

- subscribing to our social media feeds (Twitter and Facebook)
- news of crowd funding campaigns
- annual impact reports
- · communications from third party providers
- newsletters and updates

You may unsubscribe from any of these communications at any time by contacting us.

## Section 6: How we protect your personal information

We are committed to keeping your personal information secure. We keep your personal information on secure servers and have appropriate measures in place at our physical facilities. Where we have contracted IT services out we make every effort to ensure that their systems and facilities confirm to the highest security standards and are able to provide the necessary documentation to show they are compliant with data protection law with regards to data security

Whilst we strive to protect your information, due to the nature of the internet we cannot guarantee the security of any information you transmit to us. With this in mind, any transmission is at your own risk and we urge you to take every precaution to protect your personal information while you are online.

## Section 7: How long can we keep your personal information?

We only keep your personal information for as long as is reasonably necessary to fulfil the relevant purposes described in this privacy policy or for longer, if required by law. The minimum retention period relating to financial transactions (for example the payment of fees or subscriptions) will be seven years. Once we decide it is no longer necessary to keep your information, it will be securely and confidentially destroyed.

#### Section 8: Transfer of data outside the EEA

We will not transfer your data outside the UK and EEA as we are unable to guarantee that such transfers will be subject to same levels of protection for the data as within the EEA under data protection law.

#### **Section 9 Your Rights:**

#### The right to access your personal information

Subject to any relevant exemptions, you are entitled to see a copy of the personal information we hold about you and to request details of how we use your personal information including any disclosures made. To exercise your rights to access your personal information, please contact us. There will not usually be a charge for dealing with these requests.

Your personal information be provided to you in writing, or where you have made the request by electronic means, your personal information will be provided to you by electronics means, where possible.

#### The right to rectification

We take reasonable steps to ensure that the personal information we hold about your is reliable, accurate and as complete as necessary for its intended use; but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to update or amend any personal information we hold about you, please contact us.

#### The right to object to marketing

As set out in section 5, you are entitled to object to receiving marketing material from us at any time. You can exercise this right by contacting us or click 'unsubscribe' at the bottom of any marketing email.

# Other rights

Under certain conditions, you may also have the right to require us to:

- delete any personal information where no longer have legal grounds to retain it
- where processing is based on consent, to withdraw your consent so that we can stop that particular processing
- object to any processing based on the legal ground of legitimate interest unless our reason for undertaking that processing outweighs any prejudice to your data protection rights
- restrict how we use your personal information whilst a complaint is being investigated.

If you contact us to exercise any of these rights we will confirm your right to do so and respond in most cases within 30 days.

Section 10: Your right to complain to the Information Commissioner's Office If you are not satisfied with our use of your personal information, with our response to any exercise of your rights set out in section 9 or if you believe us to be in breach of our data protection obligations, you have the right to complain to the Information Commissioners Office at:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 SAF. Telephone 0303 123 1113 (local rate) or 01625 545 745 (national rate number).

#### Section 11: Other websites

Our website may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third party websites.

# **Section 12: Cookies**

Wet use a very limited number of cookies on its website. Cookies are small data files that are transferred from the website to your device where they are stored on the device's hard drive. We use cookies to enhance to provide a better user experience and as a means to track user behaviour on the site, such as the areas visited which are then anonymised and processed Google Analytics.

You can set your web browser to refuse cookies, however, some of our website features may not function as a result.

The cookies we make us of on our website are:

Cookie Name	Purpose	Lifetime
https://	Anonymised tracking data	14 Months
analytics.google.com	to Google Analytics.	
https://platform.twitter.com	Records interaction with	30 days
	Twitter	
Facebook Cookies	Records interaction with	30 Days
	Facebook	-

#### Section 13: How to contact us

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

You can contact us by writing to us at 110 Edward Road, Balsall Heath, Birmingham B12 8LF or email us at <a href="mailto:info@saheli.co.uk">info@saheli.co.uk</a>.

We may update this policy from time to time to keep it up to date or comply with legal requirements. The latest version of this policy can be found at <a href="https://www.saheli.co.uk">www.saheli.co.uk</a>