



## ***Suffolk Refugee Support Privacy Policy***

At Suffolk Refugee Support, we're committed to protecting and respecting your privacy in line with current legislation.

This Policy explains when and why we collect personal data about people, how we use it and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [office@suffolkrefugee.org.uk](mailto:office@suffolkrefugee.org.uk) or by writing to Suffolk Refugee Support, 38 St Matthew's St, Ipswich, IP1 3EP.

### **1. Who are we?**

We're Suffolk Refugee Support, a specialist independent charity established in 1999 to support refugees and asylum seekers in Suffolk. Suffolk Refugee Support is a registered charity (no. 1078794) and company limited by guarantee (no. 03894990). The registered address is 38 St Matthew's St, Ipswich, IP1 3EP.

### **2. How do we collect information from you?**

We obtain information about you when you use our website, for example, when you contact us through a form on the website, opt in to our mailing list, download an application form or comment on a post.

We obtain information about you when you apply to become a volunteer or Trustee, or when you apply for a job at SRS whether via our website, by email, by post or by phone.

We obtain information about you when you request help from one of our services or when you are referred to one of our services by a partner organisations or as part of the Refugee Resettlement Programme.

### **3. Why do we collect and use information about you?**

We will only use your personal data when the law allows us to:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- We may also use your personal data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest

**The main purposes for which SRS use your personal data are:**

- To enable us to carry out the work of SRS as specified in our Memorandum and Articles (also known as our constitution).;
- To respond appropriately to your contact with us.
- To provide services to our Service Users.
- To recruit Trustees, Employees and Volunteers
- To send you communications which you have requested and that may be of interest to you; these may include information about campaigns, appeals and fundraising.
- For legal and regulatory compliance purposes, for example, to ensure compliance with safeguarding, health and safety requirements and other legal obligations, or in connection with litigation, an internal investigation or audit, and to ensure compliance with laws, as well as equal opportunities monitoring;
- To process donations or standing orders we may receive from you;
- To process membership applications
- To carry out any contractual obligations we may have to you such as fulfilment of an order (such as Christmas card purchasing)
- To maintain our own accounts and records;
- For our 'legitimate business interest', which means a reasonable use in line with what the aims and activities of SRS are.

Should you choose to contact us using our website contact form or an email link, none of the data that you supply will be stored by our website.

#### **4. What type of Personal Data is collected from you?**

Personal data we collect can include information such as your name, communication preferences, email address, postal address, telephone number, mobile number, date of birth, and, where relevant, bank account details so we can process donations or payments and information as to whether you are a taxpayer to help us to claim gift aid. We may also collect and record any other relevant information you share with us about yourself.

If you contact us via the website, we may also collect and process information about your interactions with us, including IP address, and information regarding what pages are accessed and when.

We may also receive information about you when you interact with third parties with whom we work. For example, where you've made a donation to us through a third-party website (e.g Virgin Money Giving) and given them permission to share your information with us. However, your card information is not held by us, it is collected by the third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

## **5. Special Categories of data**

Under data protection law, certain special categories of personal data are recognised as sensitive, including information regarding race, religious beliefs, immigration status, sexuality and health. We would only collect sensitive personal data if there is a clear and legitimate reason for doing so.

We do not collect sensitive personal data unless there is a clear reason for doing so, for example we might collect physical or mental health, or disability status of a volunteer to ensure their health and safety whilst carrying out their role.

We do collect sensitive personal data about our service users but only where there is legitimate reason to do so and that it is necessary to do so for the purpose for which the service user is being helped by us.

### **Data relating to recruitment**

SRS has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants, volunteers or Trustees allows SRS to manage the recruitment process. SRS may also need to process data from job applicants to respond to and defend against legal claims.

SRS may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. SRS processes such information to carry out its obligations and exercise specific rights in relation to employment.

For most of its roles, SRS is obliged to seek information about criminal convictions and offences. Where SRS seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment or volunteer recruitment.

## **6. Sharing your data with a third party**

We do not share with, sell or rent the information you provide on our website to any third parties. Our website does use Google Analytics (GA) to track user interaction. This enables us to collect statistical information to analyse how people are using our site and better understand how they find and use our web pages. Although GA records data such as your geographical location, device, Internet browser and operating system; none of this information personally identifies you to us. We consider Google to be a third party data processor. GA makes use of cookies, details of which can be found on [Google's developer guides](#). Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

We may transfer your personal data to a third party if you are a Service User and sharing is required for the purpose for which we are providing you support.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may share your personal data with a third party if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and service users. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

We may share your personal data if it is necessary for our legitimate interests and if your interests and fundamental rights do not override those interests.

## **7. Retention of data**

We review our retention periods for personal data on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We will hold your personal data on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

## **8. Legislation compliance**

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1998 (DPA)
- The Privacy and Electronic Communications Regulations 2003
- EU General Data Protection Regulation 2018 (GDPR)

## **9. Additional information for Employees and Service Users**

Relevant Privacy Information Notices are issued to Employees and to Service Users when required.

## **10. Additional information for Supporters and Website users**

### **How can you change your contact details and preferences with us?**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the work we do with refugees and events, news, updates, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences or unsubscribe at any time by contacting us by email: [office@suffolkrefugee.org.uk](mailto:office@suffolkrefugee.org.uk), or writing to us at: 38 St Matthew's St, Ipswich, IP1 3EP.

### **The right to have inaccuracies corrected**

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [office@suffolkrefugee.org.uk](mailto:office@suffolkrefugee.org.uk), or write to us at: 38 St Matthew's St, Ipswich, IP1 3EP.

### **The right to request a copy of personal data held about you**

You have the right to ask for a copy of the information Suffolk Refugee Support hold about you. If you would like a copy of the information we hold on you, in the first instance please write to:

Office Systems Coordinator  
Suffolk Refugee Support  
38 St Matthew's St  
Ipswich  
IP1 3EP

### **Other rights:**

- The right to request that we stop or restrict the processing your personal data
- The right to withdraw consent (if previously given)
- The right to lodge a complaint with the Information Commissioner's Office or with the SRS Charity Manager

### **Security precautions in place to protect the loss, misuse or alteration of your information**

We do not take sensitive data over the Internet. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information whether over the Internet or by other means, we make our best efforts to ensure its security on our systems in line with our Information and Data Sharing Policy.

### **Use of 'cookies'**

- Like many other websites, the Suffolk Refugee Support website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better, more personalised service.
- It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer,

visit our [cookies policy](#). Turning cookies off may result in a loss of functionality when using our website.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal data.

### **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in August 2020..