



## **Harrow Community Action Privacy Policy – How We Use Cookies & Personal Data**

This privacy policy sets out how we collect, use and store your personal information.

Please read this policy carefully; by providing us with your personal information, you consent to the collection and use of any information you provide in accordance with this policy. Occasionally, we may make changes to this policy so do remember to check back at regular intervals.

If you have any questions on this policy, please contact Voluntary Action Harrow Co-operative – [contact@voluntaryactionharrow.org.uk](mailto:contact@voluntaryactionharrow.org.uk) | 020 8861 5894

### **Who we are**

Harrow Community Action (HCA) is a consortium working to strengthen the voluntary & community sector. HCA provides an opportunity for Harrow organisations to work in partnership to secure larger contracts to create a stronger sense of local identity, engagement, support, collaboration and focused mission for the voluntary & community sector.

<http://www.harrowca.org.uk/about/>

Harrow Giving is a trading name of a project of the Harrow Community Action Consortium. Through Harrow Giving we raise funds for local causes and administer a local grants.

<http://harrowgiving.org.uk/>

Voluntary Action Harrow Co-operative is contracted by Harrow Community Action to co-ordinate the work of Harrow Community Action.

Harrow Community Action is a 'Data Controller' and Voluntary Action Harrow Cooperative is a 'Data Processor' for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Data Protection Officer by: email at [info@harrowca.org.uk](mailto:info@harrowca.org.uk) or by phone via Voluntary Action Harrow on 020 8861 5894.

### **How we collect information**

Information helps us operate as efficiently as possible and to make sure our interactions with you are timely, relevant and tailored for you.

To do this, we may collect information about you in the following ways:

<b>Collection Methods</b>	<b>Examples (but not limited to)</b>	<b>Reason</b>
When you interact with us.	Communicating with us by email, attending an event, donating, completing a survey, applying for a grant.	This data helps us communicate with you, answer your queries, and respond to your requests more effectively.
When you interact with third parties.	Engage with us on social media and messaging services like Facebook, WhatsApp or Twitter.	The data we are given access to by social media services will vary but will always be in line with the Terms of that particular service.
When you visit our website	We may gather information, such as which pages you visit or how long you spend reading a particular page.	This data helps us to improve your online experience, for example by adding new features, or removing elements that make the website difficult to use.
From other information that is available to the public	We may use information from publicly available sources such as Companies House, the Charity Commission or information published in the media (websites, social media etc...).	By understanding more about you, the support you might need, and how you might be interested in supporting us, means we can help effectively.

### **What information we collect**

Depending on how you interact with us (online, offline, over the phone, etc.), we may collect from you various types of information. We may also gather information that is publicly available, to build a better picture of you and your interests, as well as behavioural data on digital platforms so we can consider how best to ask for your support.



We do this to make sure our communications to you are appropriate and tailored.

### **How we use your information**

We will ask for your consent before we use your information for certain purposes, such as sending you emails about training events.

We may also use your information where we have a legitimate interest in order to carry out our activities, examples include:

- To provide you with the services, products or information you have requested, or that we feel would be of interest to you, and reasonably expected by you
- To process your donations, payments and verify financial transactions
- To process orders, deliver products and communicate with you about orders
- To provide updates on our work, where you have agreed to receive this
- For administrative purposes, for example to contact you with a query or where you have contacted us
- To keep a record of your communications with us
- To ask you to participate in surveys or research
- To analyse the personal information we collect about you alongside publicly available information to better understand you and ensure our communications, and work, are tailored to you
- To carry out due diligence in accordance with our internal policies
- To analyse and improve our website, services, products or information
- To understand our supporters better and develop service briefs
- To process a volunteer position, internship or job application.

So we can let you know the latest news, we may contact you by direct mail, and by telephone, email or SMS, where you have agreed to be contacted. You can change how you hear from us at any time simply by getting in touch with us.

If you would prefer us not to analyse your information or combine it with publicly available information, you can let us know by contacting us.

### **Who we share your information with**

We may share your information with service providers to allow them to perform services on our behalf. This will not be done without your consent.



These agencies will only act under our instruction and will not use your information for their own purposes. We require any external agencies to comply with UK's law on data protection and to have systems and processes to protect the security of your information.

We will ensure your details are kept safe and we'll never sell or swap your information with any other organisation. We may disclose personal information if required to do so by law or if we believe that such action is necessary to protect and defend the rights, property or personal safety of Harrow Community Action, our websites or our visitors and for other lawful purposes.

### **How we keep your information safe**

We make sure that appropriate physical, technical and human controls are in place to ensure we take good care of your information.

However, the transmission of information over the internet is never completely secure and as a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your data, we make every effort to try to ensure its security both on our systems and while in transit between our systems and our partners who work on our behalf.

All staff who have access to your personal data understand the importance of keeping your information safe and secure at all times and are given training to support them in this.

We cannot be responsible for the privacy policies and practices of other websites even if you access them using links from our websites and recommend that you check the policy of each site you visit.

We ensure that additional controls are in place for financial, sensitive and special categories of information, meeting regulatory and legal requirements for managing these types of information.

### **How long we keep your information**

We will hold your personal information on our systems for as long as is necessary for the relevant activity, and meet any legal or regulatory requirement. This is so that we can provide the services, products or information you have requested, to administer your relationship with us, to ensure we don't communicate with you if you've asked us not to and to comply with the law.



You have the right to object to your data being processed by us and can do so by contacting us at The Lodge, 64 Pinner Road, Harrow, HA1 4HZ by email at [info@harrowca.org.uk](mailto:info@harrowca.org.uk) or by phone via Voluntary Action Harrow on 020 8861 5894

You can request a copy of the personal information that we hold about you under the General Data Protection Regulation 2018. If you would like to do so, please send a description of the information you would like, as well as approved proof of identity to us at The Lodge, 64 Pinner Road, Harrow, HA1 4HZ by email at [info@harrowca.org.uk](mailto:info@harrowca.org.uk) We will act on all valid requests as soon as possible, and at the latest within **one calendar month**, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

You have the right to lodge a complaint about the way we manage your data with the Information Commissioner's Office.

### **How to change the way we contact you**

We always want you to be happy with the communication you receive from us.

If you want to change how you hear from us, or update your details, simply get in touch us at The Lodge, 64 Pinner Road, Harrow, HA1 4HZ by email at [info@harrowca.org.uk](mailto:info@harrowca.org.uk) or by phone via Voluntary Action Harrow on 020 8861 5894.

### **You can also change the way we contact you in the following ways**

You can use the unsubscribe or update preferences link in an email from us.

Where you tell us that no longer want to hear from us for marketing purposes, please be aware that we may still contact you for administration purposes or providing you with information you've requested or in helping resolve a query.

### **How we use cookies**

Cookies are small text files that are placed on your device to help us give you a better experience of using our website. Cookies do lots of different things, such as helping us to:

- personalise the website to your requirements
- avoid asking you to register or complete details twice
- estimate the number of visitors to our site, including the source and patterns relating to this traffic
- display relevant advertising to you when you visit other websites



- understand how visitors use the site, and how we can enhance this experience

You are able to set your devices to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time, although of course please be aware this means that you'll miss out on some personalised services. You should read the information that came with your browser software to see how you can do this.

You can also find out more about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu/](http://www.youronlinechoices.eu/).

### **What if I'm under 16?**

If you are under 16, please make sure that you obtain your parent/guardian's permission beforehand whenever you provide personal information via our websites. Users without this consent are not allowed to provide us with personal information. Also, if you do use our sites to obtain information about supporting or accessing our work, please let an adult know.

### **Changes to this policy**

We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you by means of a notice on our home page.

This privacy policy was last updated on 15th May 2018