

## GivingTime Privacy and Online Policy

December 2024

### Section A - Privacy Policy

#### 1. Introduction

GivingTime, a registered charity with the charity number 1176752 ("we", "us" and "our"), is committed to safeguarding information provided to us by any person who it deals with ("you") relating to an identified or identifiable living individual, such as names, contact details and ID data ("**Personal Information**"). This includes the Personal Information of our GivingTime volunteers ("**Volunteer(s)**"); the young people who take part in the GivingTime programme ("**Students**") and all visitors to the website <https://givingtime.org.uk/> (our "**Website**").

This Privacy and Online Policy (the "**Policy**") sets out how we will handle any Personal Information we collect from you, that you provide to us, or we otherwise obtain in connection with our day-to-day business and which we hold in the capacity of a data controller. We will only use Personal Information as set out in this Policy and will ensure that your Personal Information is handled in accordance with the Data Protection Legislation that applies to us.

In this Policy, "**Data Protection Legislation**" means (i) the UK Data Protection Act 2018, (ii) the General Data Protection Regulation (EU) 2016/679 ("**EU GDPR**"), (iii) the "**UK GDPR**" which means the EU GDPR as incorporated into English law pursuant to the European Union (Withdrawal) Act 2018, (iv) the Privacy and Electronic Communications (EC Directive) Regulations 2003 and (v) all similar or related legislation relating to the processing of Personal Information applicable to GivingTime from time to time.

GivingTime is the data controller for the purposes of Data Protection Legislation, meaning that GivingTime determines what happens to the Personal Information that you provide.

Personal Information will be held by GivingTime in confidence in accordance with the Data Protection Legislation. Please read the following carefully to understand our practices regarding your Personal Information and how we will treat it. **If you need any of this policy explaining to you, please feel free to contact:** [admin@givingtime.org.uk](mailto:admin@givingtime.org.uk)

By visiting our Website you accept and consent to us collecting, using and transferring your Personal Information as described in this Policy. GivingTime may make changes to this Policy from time to time and so you should check this page frequently to ensure that you are happy with them.

#### 2. Information we may collect from you

We may collect and process Personal Information about you from any of the following means:

- (i) *Directly*
  - You may give us Personal Information about yourself by: registering as a Volunteer or a Student or as a point of contact for a school, GivingTime location or other partner; filling

in forms on our Website, by communicating with us by phone, email or otherwise and/or you or your organisation receives services from us or provides services to us or otherwise has a business relationship with us.

- You may give us emergency contact information (including contact details for notifying your next of kind and arranging medical attention).
- The Personal Information you give us may include your name; date of birth; address; e-mail address or phone number. If you register as a Volunteer you may provide your employment details, DBS certificate or other background checks, any personal description provided, proof of identification and photograph.
- Where you provide Personal Information on behalf of another individual, you are responsible for telling that individual that you have provided their Personal Information to us and directing them to this Policy so they can see how we will process their Personal Information.

*(ii) Automatically*

Where you make use of our Website we may also collect information about your use of the Website (e.g. your IP address).

*(iii) Cookies*

In addition, we and our authorised third parties may use “cookies” and/or other tools to store and sometimes track information about you. This is pretty common practice used by many online services. We do this to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For more information about how we use cookies and to manage our use of cookies please visit here: <https://givingtime.org.uk/cookie-policy/>

You can restrict, remove or block cookies or tracking services through your browser settings at any time (see below). Strictly necessary cookies may be set as soon as you access our Website, but you can remove them by enabling the Do Not Track (or DNT) preference in your browsing settings. This will let us know that you do not want us to collect certain information about you. For more information about how to do this, you can visit: [allaboutcookies.org](http://allaboutcookies.org) and [youronlinechoices.eu](http://youronlinechoices.eu)

### **3. Information we receive from other sources**

We may receive Personal Information from other sources including third parties we work with (such as schools and partners) who have confirmed to us they are authorised to pass your information on to us and we may share this data internally.

Volunteers and/or Students may also give us emergency contact information as part of our emergency scenario planning.

Where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Policy and obtaining any relevant consents from you to ensure you are happy with the ways in which your Personal Information will be used.

However, once we are holding it, we will only handle any person's Personal Information in accordance with this Policy.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out in paragraph 5 below (depending on the types of information we receive).

#### 4. Sensitive Personal Information

"**Sensitive Personal Information**" is defined under the Data Protection Legislation (as "*special category personal data*") but more easily understood as Personal Information that is particularly sensitive in nature such as information about an individual's race or ethnicity, religious beliefs, physical or mental health or sexual orientation or criminal records data.

Given the nature of the GivingTime programme, you may disclose Sensitive Personal Information to us whilst you are on the programme or otherwise communicate with us. Where applicable, our coaches will not record and/or disclose any Sensitive Personal Information about you unless it is necessary to follow the GivingTime Safeguarding Policy and Procedure and/or instructions from the GivingTime Safeguarding Officer, instructions from the police or local authorities and/or the law. Where we do receive and retain Sensitive Personal Information, we will only process and keep such information as set out in this Policy.

#### 5. Purposes for collecting and using your Personal Information

We will generally collect and use your Personal Data for one or more of the following purposes:

- (i) *Personal Information you give to us.*
- correspond with you, including to help us to provide you with the information required for your participation in the GivingTime programme;
  - to help us improve the Website, the experience you have and the quality of our services;
  - to send, with your permission, newsletters, updates and useful information about volunteering and how to get involved;
  - to ensure that content from our Website is presented in the most effective manner for you and for your device;
  - provide our services to you or your organisation or receive services from you or your organisation;
  - to administer and/or manage our relationship or potential relationship with you;
  - run our business affairs, including internal record keeping; and
  - comply with our legal obligations.
- (ii) *Personal Information we collect about you by other means.*
- to administer our Website and for internal operations, including troubleshooting, data analysis, testing, improvements, research, statistical and survey purposes;
  - to improve our Website to ensure that content is presented in the most effective manner for you and for your device;
  - to keep our Website safe and secure;
  - provide our services to you or your organisation or receive services from you or your organisation;
  - to administer and/or manage our relationship or potential relationship with you;
  - run our business affairs, including internal record keeping; and

- comply with our legal obligations

## 6. Lawful basis for processing your Personal Information

We will only process your Personal Information where we have a legal basis for doing so. Our legal basis will be one of the following bases outlined below:

- to fulfil a contract that we have in place with you;
- to comply with our legal obligations;
- to pursue our legitimate interests (or those of a third party), provided that your interests and fundamental rights do not override those interests; or
- where we have your express consent (in which case, you will be made aware and will be provided with the opportunity to withdraw your consent to the processing, should you wish to do so).

Where we process Sensitive Personal Information, we require an additional legal basis which will be one of the following bases outlined below:

- where you have made the information public;
- where we have your explicit consent (in which case, you will be made aware and will be provided with the opportunity to withdraw your consent to the processing, should you wish to do so);
- to fulfil our rights or obligations in the field of employment, social security or social protection law;
- to protect an individual's vital interests where they are physically or legally incapable of giving consent;
- to establish, exercise or defend legal claims; or
- where necessary for reasons of substantial public interest.

## 7. Disclosure of your Personal Information

We may share your Personal Information with selected third parties including: Volunteers, Young People, Schools, partners, and other third parties where it is necessary to enable us to provide the GivingTime programme.

We may also disclose your Personal Information to or share it with third parties:

- if we are under a duty to do so in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements;
- to protect the rights, property, or safety of GivingTime, our Volunteers, our Students, or others; and/or
- as necessary to follow the GivingTime Safeguarding Policy and Procedure and/or instructions from the GivingTime Safeguarding Officer, instructions from the police or local authorities and/or the law. This also applies to the disclosure of Sensitive Personal Information.

GivingTime will never sell your Personal Information. Where you have consented to this, we may send you updates on GivingTime and how you can stay involved with the GivingTime programme.

## **8. Where we store your Personal Information**

The Personal Information that we collect will be stored on a server within the United Kingdom ("UK"), however, this data may be processed outside the UK or European Economic Area ("EEA") by one of our suppliers. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy.

This means that we will only transfer your Personal Information outside the EEA or the UK (as applicable) if: (a) the receiver of the Personal Information is located in a country that the Information Commissioner's Office or European Commission (as applicable) has confirmed gives the right level of protection to individuals' Personal Information, (b) the receiver of the Personal Information has put in place a transfer mechanism approved under the relevant Data Protection Legislation such as the "model clauses"; or (c) we have your explicit consent to do so. Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by using the contact details in Section 14.

By submitting your Personal Information to us, you acknowledge and agree to this transfer, storing and processing of your Personal Information.

All Personal Information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website; any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access.

## **9. Retention of Personal Information**

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as Data Protection Legislation and our own internal rules and policies allow.

## **10. Your rights**

You have the right to ask us not to process your Personal Information for marketing purposes. We will request your consent to use your Personal Information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by indicating via the method provided on the forms we use to collect your Personal Information. You can also exercise the right at any time by sending us a privacy question on our Contact page.

## **11. Access to and updating your information**

You are entitled, subject to certain exemptions, to see the Personal Information we hold about you (unless, for example, our duty of confidentiality to a third party takes precedence over this right). You can also ask us to: (a) make any changes to ensure that any Personal Information we hold about you

is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) in some circumstances, transfer any information we hold about you to a specified third party.

If you wish to exercise any of these rights, please contact the Data Protection Coordinator, Chris Paterson by email at [admin@givingtime.org.uk](mailto:admin@givingtime.org.uk).

## 12. Third party links

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

## 13. Changes to our privacy policy

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Policy.

## 14. Contact

Should you have any queries or complaints in relation to how we use your Personal Information, please contact the Data Protection Co-ordinator, Chris Paterson by email at [admin@givingtime.org.uk](mailto:admin@givingtime.org.uk). Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office (which is the supervisory body in the UK) or, if you are an EU data subject, one of the competent European supervisory authorities..

## Section B - Online Policy

This online policy has been drawn up to protect Students in their use of the internet, online communications and technology ("online") as part of the GivingTime programme, as we believe that being online is beneficial for Student's education and development as long as sufficient safeguards are in place to keep Students safe. This online policy applies to all Students, Volunteers and anyone involved in GivingTime's activities.

In accordance with our diversity policy, we believe that we have a responsibility to keep all Students safe (regardless of factors such as age, disability, gender reassignment, race, religion or belief, sex or sexual orientation) when participating in the GivingTime programme whether online or otherwise, regardless of whether the network and devices used are personal or owned by a School or GivingTime.

We seek to keep Students and Volunteers safe online where the GivingTime programme is delivered online by:

- our safeguarding lead being engaged as to the potential harms posed by being online, contactable by email [safeguarding@givingtime.org.uk](mailto:safeguarding@givingtime.org.uk);
- providing direction to Students and Volunteers on how to behave online;
- incorporating online safety to the agreement that our Students and Volunteers sign up to;

- developing clear and robust procedures to enable us to respond to any incidents of any inappropriate online behaviour;
- providing guidance to Volunteers with regards to using their personal devices for GivingTime activities;
- having safeguarding procedures in place and providing safeguarding training to all Volunteers; and
- recording coaching sessions when they are conducted online (with the Student's prior consent).

**Reviewed:** December 2024

**Next review:** December 2025