

DAME AGNES WESTON'S ROYAL CHARITY FOR THE NAVAL SERVICE

PRIVACY POLICY

Introduction

This Policy explains when and why Aggie Weston's collects personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Any questions regarding this Policy and our privacy practices should be sent by email to office@aggies.org.uk or by writing to Data Protection Officer, Aggie Weston's, Castaway House, 311 Twyford Avenue, Portsmouth, PO2 8RN. Alternatively, telephone 02392 650505.

Guidance

This policy is based on the advice and guidance contained in the Information Commissioner's Office "Guide to the General Data Protection Regulations." The trustees of Aggie Weston's are committed to meeting the Charity Commission expectation that charities should operate in line with this guidance, and within the provisions outlined in the charity's own governing document.

Process

We obtain information on individuals in a number of ways. We hold information on those directly attached to the charity; for example, as trustees, employees, potential employees or suppliers. We also gather information on those who contact us about products and services, to donate, or to register to receive our magazine.

The personal information we collect includes name, address, email address, IP address, and information regarding what pages are accessed and when. If you make a donation online, the card information is not held by Aggie Weston's, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

We may use the information to:

- process a donation;
- to carry out our obligations arising from any contracts entered into by you and us;
- seek views or comments on the services we provide;
- issue notification of changes to our services;
- send communications which have been requested
- process a grant or job application.

Aggie Weston's reviews the retention periods for personal information 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 personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract held with us.

We accept that we must have a lawful reason to process personal data. All data which we retain is justified through one of six lawful reasons:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

Details of the various retention times and legal basis for holding data are given at Annex A.

Who has access to information?

Aggie Weston's will not sell or rent information to third parties.

Aggie Weston's will not share information with third parties for marketing purposes.

When using our secure online donation page, the donation is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions

We use a third-party distributor to send out our magazines. This organisation has access to the addresses of those who wish to be on the distribution list.

Our data is held on secure servers which are maintained by a trusted and certified third-party IT specialist.

Staff information is shared with our third-party payroll provider via a secure net to facilitate payment of salaries.

Contact choices

Aggie Weston's will not contact anyone for marketing purposes by email, phone or text message unless prior consent has been given. We will not contact anyone for marketing purposes by post if they have indicated that they do not wish to be contacted. Marketing preferences can be changed at any time by contacting Aggie Weston's by email: office@aggies.org.uk or telephone on 02392 650505.

How to access and update information

The accuracy of information is important to Aggie Weston's. If information needs updating, please email: office@aggies.org.uk or write to Aggie Weston's, Castaway House, 311 Twyford Avenue, Portsmouth, PO2 8RN. Alternatively, telephone 02392 650505.

You have the right to ask for a copy of the information Aggie Weston's holds on you. If you want a copy of the information we hold on you please contact our Data Protection Officer by writing to Data Protection Officer, Aggie Weston's, Castaway House, 311 Twyford Avenue, Portsmouth, PO2 8RN or by email: office@aggies.org.uk. The process that will be followed is at Annex B.

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure. If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner.

The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

T: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

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

Non-sensitive details (email addresses etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while Aggie Weston's strive to protect personal information, we cannot guarantee the security of any information you transmit to us over this medium, and you do so at your own risk. Once we receive your information, our policies, processes and storage arrangements ensure the security of the information.

Profiling

We will not use your information for profiling

Links to other websites

The Aggie Weston's website contains links to other websites run by other organisations. This privacy policy applies only to our website. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from the Aggie Weston's website.

In addition, if you linked to the Aggie Weston's 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.

16 or Under

If you are aged 16 or under, please get a parent/guardian's permission before you provide Aggie Weston's with personal information.

Data Processing and reason for holding information

This Annex details the various areas where Aggie Weston's holds personal data, why we are allowed to hold the data and how long we will hold the data for.

Storybook Waves

Lawful process - consent

Users' details

Log sheets and associated audio will be kept for three years then destroyed. All files are backed up onto Microsoft One drive. This is to be cleared on an annual basis so that no more than three years' worth of data is kept. All paper and digital files will be destroyed after three years. Paperwork will be shredded and digital files wiped. The reason for keeping the files for this length of time is so there is the ability to replace a copy of a story if the original is damaged or lost.

Editors' details

Details are not given to a third party and are only on paper. The paper records will be destroyed once there has been 1 year of no contact.

Aggies@Rowner

Lawful process – Consent

Stats sheets

As they have financial information they will be kept for 7 years, in accordance with current accounting rules.

Photo consent forms

These are kept at the office in Shackleton Road and are reviewed annually.

Magazine Distribution Database

Lawful process – legitimate interest for existing supporters, consent for new additions to the database

Removal from database

This database is a live document. We save copies of it on a monthly basis and retain these copies for 3 years, showing removals and hardcopy removal requests. The records must be kept for 3 years in case there is a query on legacies or gift aid status.

Gift aid forms

Even if the supporter has been removed from the database, Gift Aid records are financial records and must be kept for 7 years in accordance with current accounting rules.

Staff files

Lawful process - Consent

Personnel files will be held for 1 year after the member of staff has left. Paper records will be shredded and digital records wiped. Finance records will be held for 7 years in accordance with current accounting rules.

Unsuccessful job applicants

Lawful process – Consent

Details of unsuccessful job applicants will be destroyed 3 months after the closing date of the role or the interview as applicable. The reason for holding the data is if after interview the successful candidate pulls out for any reason or another role arises for which the unsuccessful candidate may be better suited.

Subject Access Request Policy

This Annex sets out Aggie Weston's policy for responding to "subject access requests" under data protection legislation.

A subject access request is a written request for personal information (known as personal data) held by Aggie Weston's. Data protection legislation gives individuals the right to know what information is held about them. However, this right is subject to certain exemptions.

When we receive a subject access request we will first check that we have enough information to be sure of the identity of the person requesting the information. Often we will have no reason to doubt a person's identity, for example, if we have regularly corresponded with them. However, if we have good cause to doubt identity we can ask for any evidence we might reasonably need to confirm identity.

We will gather any manual or electronically held information (including emails) and identify any information provided by a third party or which identifies a third party.

If we have identified information that relates to third parties, we will write to them asking whether there is any reason why this information should not be disclosed. We do not have to supply the information to you unless the other party has provided their consent or it is reasonable to do so without their consent. If the third party objects to the information being disclosed we may seek legal advice on what we should do.

We will deal with a subject access request without undue delay and in any event within one month of receipt of the request. However, if the work involved is particularly complex or if numerous requests are made then we may extend this period by up to two additional months. In this case, we will inform the individual about the extension and explain the reasons.

We will not charge a fee to complete such a request.

We will explain what steps have been taken in dealing with a request i.e. we will set out the source of the personal information we have gathered.

The information will be provided in a concise, transparent and easily accessible form. It may be provided in writing, or by other means, including, where appropriate, by electronic means.

There are a number of exemptions to our duty to disclose personal data and we may seek legal advice if we consider that they might apply. An example of an exemption is information covered by legal professional privilege.

If we agree that the information is inaccurate, we will correct it and where practicable, destroy the inaccurate information. If we do not agree or feel unable to decide whether the information is inaccurate, we will make a note of the alleged error and keep this on file.

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure. If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner.

The Information Commissioner can be contacted at:

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Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

T: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

If you would like to know more or have any concerns about how your personal data is being processed please contact:

The Data Protection Officer
Aggie Weston's
311, Twyford Avenue
Portsmouth
PO2 8RN
T: 02392 650505
E: office@aggies.org.uk