



## ASYLUM WELCOME DATA PRIVACY NOTICE

### INTRODUCTION

Asylum Welcome (“we”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our supporters, donors, volunteers, staff, suppliers and clients and will only collect and use personal data in a way that are described here, and in a way that is consistent with our obligations and your rights under Data Protection law.

In line with these rules we will aim to contact supporters principally where they have consented to receive such communications (opted in). This will certainly apply to any email communication, where consent is absolutely required.

Charities raise money through direct marketing, and GDPR makes it clear that direct marketing can be considered a ‘legitimate interest’. ‘Legitimate interest’ allows a charity to send direct marketing by post as long as an individual hasn’t said ‘no’. If a supporter has said ‘no’, their interests will override our ‘legitimate interest’.

Our marketing communications include information about our latest projects, events, appeals and fundraising. If you would like to receive such communications but have not opted in, please contact us on 01865 722082 or [development@asylum-welcome.org](mailto:development@asylum-welcome.org)

Remember you can change the way you hear from us or withdraw your permission for us to process your personal details at any time by [contacting us](#).

### HOW WE COLLECT INFORMATION ABOUT YOU

We collect information in the following ways:

#### **When you give it to us directly**

Asylum Welcome is known as the ‘data controller’ of the personal data you provide to us. We are registered with the UK’s Information Commissioner’s Office (registration no. Z8133117). We will usually collect personal data about you like your name, postal address, telephone number and e-mail address if you are supporting us. You may give us your information in order to sign up for one of our events, tell us your story, donate, volunteer for us, or communicate with us.

Your activities and involvement with Asylum Welcome will result in personal data being created. This could include details of how you’ve supported us by donating, volunteering or being involved with our events. We may also collect details of your interests and preferences (such as the ways you support us or types of causes you care about).

We do not normally collect or store sensitive data (such as information relating to health) about supporters. However, there are some situations where this will occur including, but not exclusively, if:

- An accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers)
- You are attending one of our events or trainings and have disclosed specific access or dietary needs

If this does occur we will be clear with you that we wish to collect such information, our reason for collecting such information, and that we will only do so with your specific consent and permission.

#### **When you give it to us indirectly**

Your information may be shared with us by fundraising sites like JustGiving, Benevity, payroll giving, and Easy Fundraising. These independent third parties will only do so when you have indicated that you wish to give your consent. You should check their privacy policy when you provide your information to understand fully how they will process your data.

#### **When it is available publicly**

We may occasionally combine information you provide to us with information available from external sources in order to gain a better understanding of our supporters to improve our services and any fundraising activities. For example, by analysing your interests and involvement with our work, we may be able to build a profile that helps us decide which of our communications are likely to interest you. This may include information found in places such as Companies House and information that has been published in articles/newspapers or other media.

We understand that personal data in the public domain is covered by Data Protection laws. We will only process profile information with your consent.

#### **Social media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp, Twitter or LinkedIn, you might give us permission to access information from those accounts or services, such as your location or engagement with posts online.

#### **When we collect it as you use our website?**

Our website uses Cookies and similar technologies in order to distinguish you from other users. By using Cookies, we are able to provide you with a better experience and to improve Our Site by better understanding how you use it- for example by automatically filling your name and address in text fields. There are more details below. Your acceptance of our Cookie Policy is deemed to occur when you have selected your preferred cookie options in our cookie pop-up.

## **COOKIES**

We use Google Analytics to track visits to our websites (e.g. which pages are visited the most), but this is not linked with personal information.

Our websites may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any

control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites, and such sites are not governed by this Data Privacy Notice.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

## **WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT**

The type and quantity of information we collect and how we use it depends on why you are providing it.

### **Supporters**

If you support us, for example by donating, volunteering, or signing up for an event, we will usually collect:

- Your name
- Your contact details
- Information about how you found out about us, or people in our network with whom you are connected

We hold and process supporters' personal data for a number of reasons:

- Administer and record your donation, reclaiming any Gift Aid
- Keep a record of your relationship with us, including our communications to you
- To support community-based fundraising and advocacy, where relevant
- Understand how we can improve our communications and engagement with you, ensuring we know how you want to be contacted
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted
- To send our supporters news about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to

### **Clients: Asylum Seeker, Detainee or Refugee**

If access our services, for example by make an appointment to meet with a case worker, or for us to provide you with support with your legal rights, education, employment or food service etc, we will usually collect and process:

- Your name
- Your contact details (i.e. mobile phone, email address)
- Details about your current situation (i.e. asylum seeker, detainee or refugee)
- Case file information, including hardship payments, advice appointments, addressing any homelessness or destitution issues.

We hold and process client's personal data for a number of reasons:

- To provide you with practical support, including legal rights, employment opportunities;
- To provide you with access to education services, such as English lessons.
- To provide you with support making asylum support applications and brokering urgent communication with the Home Office.
- To respond to urgent health needs.

### **Staff**

When you apply for a vacancy or send a speculative CV to us, or as a member of the Asylum Welcome team, we will usually collect:

- Contact details
- Employment history, education and job history
- Information supporting the interview processes
- Application details, including CV
- Performance reviews
- Bank & Personal Tax details
- Contract, salary and job title
- Photographs

We hold and process job applicants and employee's personal data for a number of reasons:

- Deciding about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Liaising with your pension provider.
- Administering the contract, we have entered into with you.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Deciding for the termination of our working relationship.

### **Direct marketing**

With your consent, we will contact you to let you know about the progress we are making with our services, to ask for donations or other support such as foodbank or specific needs, to inform and recruit for volunteering opportunities, and to publicise events. Occasionally, we may include information from partner organisations or organisations who support us in these communications. We make it easy for you to tell us how you want us to communicate, in a way that suits you.

Our Supporter forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. Just let us know your preferences when you provide your data, or contact us on 01865 722082 or [development@asylum-welcome.org](mailto:development@asylum-welcome.org).

If we run an event in partnership with another named organisation, your details may need to be shared. We will be very clear what will happen to your data when you register. We do not sell or share personal details to third parties for the purposes of marketing.

### **Sharing your story**

Some people choose to tell us about their experiences as community fundraisers, donors to help further our work. They may take on a role as a patron or volunteer, attend our events or sit on our committees. This may include sharing sensitive information related to their personal life, in addition to their biographical information.

If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting our work, or in documents such as our annual impact report.

We may also collect and retain your information if you send feedback about our services or make a complaint.

### **Photos**

For events, such as our AGM, we will state at the beginning that we will be taking photos. Please let us know if you do not wish your picture to be used in our communications. Occasionally we may request photos of our supporters, for example those who have completed a challenge event to support us, or community fundraisers, and would request consent at the time.

## **HOW WE KEEP YOUR DATA SAFE AND WHO ACCESSES IT**

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted and our IT network is protected and routinely monitored. Personal data is managed through the Donorfy CRM system, a well-reputed system with its own built-in security measures.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and volunteers. Staff receive training and support on how to keep online and paper-based data safe from cyber-attack, misplacement, loss or breach, both in and out of our office premises.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. We will only use reputable suppliers who can provide assurances of the security of data. A record of our checks will be kept. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

### **Retention**

We hold your information only as long as necessary for each purpose we use it. We regularly review what information we hold and delete what is no longer required.

If you decide not to support Asylum Welcome any longer, or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information.

### **Payment security**

If you wish to make donations to Asylum Welcome, we never request your bank details. BACS payments can be made directly to our business bank account (details of which are available upon request), or via our secure online donation pages (provided by JustGiving).

### **Keeping your information up to date**

We really appreciate it if you let us know if your contact details change.

## **YOUR RIGHT TO KNOW WHAT WE KNOW ABOUT YOU, MAKE CHANGES OR ASK US TO STOP USING YOUR DATA**

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g. processing your donation, volunteering, or registering you for an event) we will do so. Contact us on 01865 722082 or [development@asylum-welcome.org](mailto:development@asylum-welcome.org) if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to Asylum Welcome, Unit 7, Newtec Place, Magdalen Road, Oxford OX4 1RE. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you have any questions please send these to [accounts@asylum-welcome.org](mailto:accounts@asylum-welcome.org), and for further information see the Information Commissioner's [guidance here](#) (link is external).

### **CHANGES TO THIS POLICY**

We may change this Data Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on our website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting: Asylum Welcome, Unit 7, Newtec Place, Magdalen Rd, Oxford OX4 1RE or [development@asylum-welcome.org](mailto:development@asylum-welcome.org)

*Reviewed in May 2020*