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# Website Privacy Policy

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## Document reference Website Privacy Notice

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Approved by Leadership Team

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## Contents

1	Purpose.....	1
2	Important Information and who we are.....	1
3	Controller.....	2
4	Contact details .....	2
5	Changes to the privacy notice and your duty to inform us of changes .....	2
6	Third-party links.....	3
7	The data we collect about you .....	3
8	How is your personal data collected?.....	4
9	How we use your personal data .....	4
10	Consent.....	5
11	Change of purpose.....	6
12	Disclosures of your personal data.....	6
13	Data security.....	6
14	Data retention.....	7
15	Website Cookies .....	7
16	Your legal rights.....	7
17	Right to Withdraw Consent at any time.....	8
18	Complaints.....	8
19	Changes to the Privacy Policy.....	8

## 1 Purpose

- 1.1 This privacy notice aims to give you information on how Evolve Housing + Support collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, apply for a job or volunteer vacancy, or make a donation.
- 1.2 This website is not intended for children and we do not knowingly collect data relating to children.
- 1.3 It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## 2 Important Information and who we are

- 2.1 Welcome to the Evolve Housing + Support's privacy notice.

Version: **1.0**  
Date issued: **04-Jan-16**  
Next review: **08-Jun-18**  
Max. time b/w reviews: **3 yrs**

- 2.2 At Evolve Housing + Support we rely on the generosity and support of individuals like you. That is why we want to be completely transparent about why we need the personal information we request when you support us and how we will use it. Developing a better understanding of our supporters through their personal information allows us to make better decisions, communicate more efficiently and ultimately helps us to reach vision to support homeless people into independence.
- 2.3 Evolve respects your privacy and is completely committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### **3 Controller**

- 3.1 Evolve Housing + Support is a registered charity in England and Wales (1099051) and a Company Limited by Guarantee registered in England (4796537). We are also a registered Housing Association (H4400).
- 3.2 Evolve Housing + Support is the controller and responsible for your personal data (collectively referred to as "Evolve", "we", "us" or "our" in this privacy notice).
- 3.3 We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### **4 Contact details**

- 4.1 Our full details are:

Evolve Housing + Support  
Jenny Strudwick  
Jenny.strudwick@evolvehousing.org.uk  
Head Office  
16-20 Kingston Road  
South Wimbledon  
SW19 1JZ  
020 7101 9965

- 4.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **5 Changes to the privacy notice and your duty to inform us of changes**

- 5.1 This version was last updated on 19<sup>th</sup> April 2018, and historic versions can be obtained by contacting us.
- 5.2 The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not

yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these changes.

- 5.3 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **6 Third-party links**

- 6.1 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **7 The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- › **Identity Data** includes title, first name, last name, username or similar identifier, and gender.
  - › **Contact Data** includes address, email address and telephone numbers.
  - › **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
  - › **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
  - › **Usage Data** includes information about how you use our website, products and services.
  - › **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- 7.1 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

- 7.2 We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **8 How is your personal data collected?**

- 8.1 We use different methods to collect data from and about you including through:
- 8.2 **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- › create an account on our website
  - › subscribe to hear about our work
  - › subscribe to hear about how you can get involved in our work
  - › subscribe to hear about how you can fundraise for us
  - › sign up to take part in an event
  - › enter a competition, promotion or survey
  - › apply for a job vacancy
  - › apply to volunteer in our services
  - › give us some feedback
- 8.3 **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- 8.4 **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
- › Technical Data from the following parties:
  - › analytics providers such as Google based outside the EU
  - › Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as JustGiving based inside the EU.

## **9 How we use your personal data**

- 9.1 We will only use your information where we have a legal basis to do so and will always respect your rights.
- 9.2 Where we use your information, it may be because you have consented to us doing so or because we consider we have a legitimate interest to do so. Where we do rely on a legitimate interest to use your information, we will always ensure that this is done in a way so as not to be intrusive or cause distress, and that respects your rights. Other reasons may include using information because we have a legal obligation to do so or because we have

to fulfil contractual obligations. You have the right to withdraw consent to marketing at any time by [contacting us](#).

- 9.3 Some examples can be found below.
- 9.4 You have explicitly (opted in to) given us your consent to use the information for a specified purpose, such as sending you emails about our work, fundraising activities and how we spend your donations.
- 9.5 You have given us consent to take payment for a donation.
- 9.6 We have a legal obligation to use your information, for example to claim Gift Aid.
- 9.7 We need to use your information to fulfil a contract with you, but this is unlikely to apply to you if you support us through donations or volunteering.
- 9.8 We are using your information in pursuit of a legitimate interest, for example:
- › To pursue our charitable purpose to deliver our values
  - › To raise vital funds for our work
  - › To ensure we meet our regulatory requirements as a charity
  - › To manage our ongoing relationship with our supporters and anyone we work with
  - › Notifying you about changes to our terms or privacy policy
  - › Asking you to leave a review or take a survey
  - › To enable you to partake in a prize draw, competition or complete a survey
  - › To manage our financial transactions and prevent fraud
  - › To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
  - › Newsletter sign ups
- 9.9 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:
- 9.10 Opt-in statement**
- 9.11 We would love to stay in touch with you and tell you about the work we are doing to support homeless people on their journey to independence, and tell you about the different ways you can be involved and support our work.
- 9.12 If you are happy for us to email about the work we are doing in London to support homeless people, please tick here.
- 9.13 If you are happy for us to email you about ways you can get involved in supporting our work with homeless people in London, please tick here.
- 9.14 If you are happy for us to write to you about the work we are doing in London to support homeless people, please tick here.
- 9.15 If you are happy for us to write to you about ways you can get involved in supporting our work with homeless people in London, please tick here.

## **10 Consent**

- 10.1 You can ask us to stop sending you communications at any time by following the opt-out links on any message sent to you, or by [contacting us](#) at any time.
- 10.2 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **11 Change of purpose**

- 11.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).
- 11.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 11.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **12 Disclosures of your personal data**

- 12.1 We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4, above:
- 12.2 External Third Parties, such as MailChimp, who provide our email/newsletter capabilities.
- 12.3 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- 12.4 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **13 Data security**

- 13.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 13.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **14 Data retention**

- 14.1 How long will you use my personal data for?
- 14.2 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 14.3 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 14.4 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting US](#).

## **15 Website Cookies**

- 15.1 This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.
- 15.2 Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.
- 15.3 Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.
- 15.4 This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computers hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information.
- 15.5 Other cookies may be stored to your computers hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## **16 Your legal rights**

- 16.1 Under the General Data Protection Regulations (GDPR) you have the following rights:

- 16.2 Information Right – the right to receive the information contained in this policy and our data collection forms about the way we process your personal data.
- 16.3 Personal Data Access Right – the right to know that we are processing your personal data and, in most circumstances, to have a copy of the personal data of yours that we hold. You can also ask for certain other details such as what purpose we process your data for and how long we hold it.
- 16.4 Personal Data Correction Right – You have the right to request that we correct inaccurate data or complete incomplete data that we hold on you.
- 16.5 Personal Data Erasure Right – Known as the Right to be forgotten. In certain circumstances you may request that we erase your personal data held by us.
- 16.6 Personal Data Restriction Right – You have the right to restrict the way we process your personal data in certain circumstances, for example if: you contest the accuracy of the data, if our processing is unlawful, to pursue legal claims, where we are relying on legitimate interests to process data.
- 16.7 Data Processing Objection Right – You have the right to object to us processing your data for (i) direct marketing purposes (ii) scientific or historical research or statistical purposes and (iii) purposes of profiling related to direct marketing or based on our legitimate interests or on the performance of a task in the public interest
- 16.8 Data Portability Right – you have the right to receive a copy of certain personal data or to have it transferred to another organisation in some circumstances

## **17 Right to Withdraw Consent at any time**

- 17.1 Where we use your personal information based on your prior consent, or where you have given us permission to send you marketing communications by email and by direct message on social media, you can withdraw your consent at any time by contacting us.

## **18 Complaints**

- 18.1 If you have any complaints about how we handle your personal data, please contact us so we can resolve the issue, where possible. You also have the right to lodge a complaint about any use of your information with the Information Commissioners Office, the UK data protection regulator. Where you have a complaint about the way in which we have used your personal information in our fundraising, you can also complain to the Fundraising Regulator.

## **19 Changes to the Privacy Policy**

- 19.1 We may update this policy to reflect changes in how we use your information. You may wish to check this policy each time you provide Evolve Housing + Support with your information. Where appropriate, we will provide you with notice of any significant changes to how we use your information.