



Name of policy	Privacy Policy
Brief description	<p>This policy aims to explain how we use the information people give us, how we store it and what it means for you.</p> <p>Note: The latest version of this document must be available on our website..</p>
Approved by	Board
Who is responsible	Director of Finance and Resources
Applies to	Any one who engages with us
Other relevant policies/acts	Data Protection Policy Data Security Protocol Data Protection Act 2018 (DPA 2018) UK General Data Protection Regulation (UK GDPR) EU General Data Protection Regulation (EU GDPR)
Creation Date	January 2019
Version Control	Version 2.0

Introduction

Justice and Care does all it can to protect the privacy and protect the personal data of everyone who engages with us, by whatever means. This policy aims to explain how we use the information people give us, how we store it and what it means for you. This policy should be read in conjunction with our terms and conditions which are available on our website.

Who are we?

Justice and Care is a charity committed to helping to bring an end to modern day slavery. We are a charity registered in England and Wales (1133829) and Scotland (SC042389). Our company number is 6990037 and our registered office address is 10 Queen Street Place, London, EC4R 1AG.

Data Controller

The Chief Executive Officer is the controller for any personal data processed by Justice and Care

Data Protection Officer

The Data Protection Officer is Jon Bell. You can contact him at: security@justiceandcare.org

c/o Information Security Officer
Suite 139
210 Upper Richmond Road
London
SW15 6NP

Overarching

Justice and Care holds and processes personal information in accordance with the Data Protection Act 2018 and both UK and EU General Data Protection Regulations.

How do we collect data?

Directly with us

We primarily collect personal information each time you deal with us – that could be through making a donation, asking to be kept up to date with our work, requesting information, providing comments, applying for a job, via social media or perhaps interacting with one of our campaigns.

From website interaction

We collect non-personal data such as IP addresses, details of website pages downloaded and file downloaded using Cookies. More information about Cookies can be found below.

Indirectly from 3rd parties

We are given information from 3rd parties sites (such as Just Giving, My Donate or Benevity Causes) when you have agreed to support Justice and Care and given your consent for your information to be passed on. Organisations like these will have their own privacy policy as to how they process data.

Through social media and other sites

We may collect information that you have made publicly available from social media and other sites such as Twitter, Facebook and LinkedIn. Each will have their own privacy policies.

From publicly available data

We may also collect information from publicly available sources such as newspapers, blogs, articles, websites, Companies House and the Charities Commission.

What information do we collect

The personal data we collect and use will include personal data and special category personal data.

Types of personal data we process may include information such as;

- personal details such as name and address
- financial details
- complaint, incident and accident details
- employment details

Special category personal data may include:

- racial or ethnic origin
- political opinions
- religious beliefs, or those of a similar nature
- physical or mental health
- sexual health or orientation

We will only use the minimum amount of personal information necessary to carry out a particular activity.

Occasionally, we may collect this data for the prevention of crime, to safeguard those with whom we work and support, or for another reason which is in the public interest. Where we do this we will do it carefully and in accordance with applicable laws.

All sensitive personal data and data relating to the victims of crime is stored on a secure database platform, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, this data will only be shared with law enforcement agencies if requested under a criminal investigation, and is available to you at any point should you wish to see it.

Why do we collect information?

Broadly speaking this information is held to allow us to collect donations, assist victims of Modern Slavery and Human Trafficking, to stay in touch and connect well with supporters and to help develop and grow the work of Justice and Care.

How do we use your information?

We use the information to:

- Keep supporters up to date with our work, sometimes with real time updates
- Provide vital care and assistance for victims of crimes
- Ask for financial and non-financial support

- Process donations and Gift Aid contributions
- Provide information that you have requested
- Keep records of our relationship – including conversations we've had, events you've attended, issues you've raised, emails we've exchanged
- Conduct market research to aid our understanding of supporters
- Provide a personalised service
- Customise the content of the Justice and Care website to visitors current and future needs
- To enable certain groups to access restricted content on our site
- Analyse the information to aid our understanding of our supporters and potential donors – this includes developing profiles to help us provide the right information at the right time and also target our fundraising activities

We may use publicly available data (for definition see above) to identify potential supporters who we understand have an interest in giving major gifts or having a public profile with charities such as Justice and Care. Where you do not want to pursue a relationship with us, we will not retain any publicly sourced personal data about you that we have collected for this purpose.

For very specific situations

We will also collect and store data from time to time for other purposes, such as to organise a trip for supporters to see our work. This will be agreed with the individual at the time and might include sensitive information such as personal health and also holding such things as passport information. This information will be stored securely and only be held as long as necessary for the purpose consented to.

Use of digital information

Other information relating to website activity may be used by us to offer and improve our services, to diagnose problems with our server or services, to provide you with requested information or technical support, to administer our site and to communicate with you and to assist us with providing a more personalised experience to you on our site. We may also aggregate and anonymise information received to produce reports on trends and statistics such as the number of visitors that have visited/clicked on our site and email open rates.

We collect IP addresses to obtain aggregate information on the use of this website. An IP address is a number assigned to your computer by a web server when you're on the web. When you are on our site, we have a server that logs your computer's IP address which we generally only use to track IP addresses in the aggregate to show us how many users entered a specific area of our site. However, we may use such information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

Basis of processing your data

Data protection laws set clear guidance on the legal basis for organisations to collect and process your personal data. With the unique nature of our work we collect your data in two clear areas, we will always make clear to you which of the data we collect from you is necessary for a particular purpose.

The following legal basis is use for data collection from marketing or donor activities:

Consent

We will process your personal data on the basis of the consent you provided us. You are free to change your preferences by contacting us at any time (see changing your preferences below).

Legitimate interest

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests.

For data collection not relating to marketing or donor details, we may rely on different legal bases:

Legitimate interest

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests.

Legal compliance

If the law requires us to, we may need to collect and process your data.

Public Interest

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or dishonesty, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

Cookies

Forgive us as we get a little technical. We collect data using cookies. A cookie is an alphanumeric text file that is sent from a website and stored on your computer's hard drive by your web browser. Most browsers allow you to turn off the cookie function but if you opt to do this you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our site.

We use three different types of Cookies – those that help the website remember information from page to page (such as the details you filled in on a donation form), analytics Cookies which help us understand how many people are visiting our site and the pages they are looking at (no personal information is stored, but information may be kept for up to two

years) and embedded functionality Cookies that allow users to do such things as share one of our stories on social media such as Facebook.

If you do not wish to receive cookies you can easily modify your web browser (see <http://www.allaboutcookies.org/manage-cookies/>) to refuse cookies, or to notify you when you receive a new cookie. If you register with us or if you continue to use our site, you agree to our use of cookies.

How we share your data

We do not share, rent or sell any data we receive in relation to donors with any other charities or organisations. However, due to the nature of our work there are occasions where certain case file data may need to be shared with other charities or organisations, including law enforcement agencies.

In very specific circumstances, for example when we undertake a supporter trip, it may be necessary for us to share some data - however this will only ever be done with explicit permission and with data transfer agreements in place.

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC or if asked for if required by a law enforcement agency.

We may provide third parties with overall information about visitors and users to our site, but this information, other than as explained above, is both aggregate and anonymous.

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).

We may transfer some personal data outside the UK. If it does so, this may occur under the protections of the European Commission's standard contractual clauses, but will otherwise only take place where appropriate standards and safeguards are in place.

Our service providers and third parties

We employ some agents to help us carry out tasks on our behalf, for example processing online donations and then passing on information to us. These agents are bound by contract to protect your data and we remain responsible for them.

How and where we store your information

We use cloud based systems to process and store data. Data therefore may be processed outside of the UK. We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with both UK and EU data protection regulations. All cloud based storage systems we work with hold ICO certification. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy.

By submitting your personal data you agree to this transfer, storing and processing of your information.

For how long do we keep data?

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

For example we will retain details of donations for 7 years to meet tax and accounting requirements, but we will only hold sensitive medical personal information provided to participate in an overseas trip until the trip is completed.

Legacy income is an important source of income for our charitable work in service of our beneficiaries. We may keep data you provide indefinitely to carry out the administration of legacies and to communicate with the families of those leaving us legacies.

Security

Our intention is to use Secure Socket Layer (SSL) software, which encrypts information given over the internet to protect all personal data as soon as it is possible. We also seek to ensure our network is protected and routinely monitored and ensure that access to personal data is restricted to those staff and volunteers whose job role requires such access and that suitable training is provided.

Whilst we make every reasonable effort to ensure that information sent to us is done so securely, we cannot warrant the security of information transmitted to us through the internet. When you transmit information to us via the internet, you do so at your own risk.

Financial details

If you use your debit or credit to donate to us, or pay for a trip, whether online, over the phone or by mail, we will process your information securely in accordance with the [Payment Card Industry Data Standard](#). We do not store your debit or credit card details once your transaction has completed. All card details are securely destroyed once your donation or payment has completed.

Bank account details will be used for the purpose of collecting direct debits or standing orders. We or our partner organisations will always work in accordance with direct debit mandate rules.

Changing your preferences

We want to make sure you receive the information from Justice and Care that you want in the way you want. You can change therefore your preferences on what you receive from us and how we contact you (mail, phone or email) at any time.

You can do so by:

Visiting our website – www.justiceandcare.org

Calling us: 0203 959 2580

Email us: hello@justiceandcare.org

Write to us: Suite 139, 210 Upper Richmond Road, London, SW15 6NP

Your rights

You have the right to ask us not to process your personal data for marketing purposes such as by email or text. We will inform you (before collecting your data) if we would like to use your data for such purposes. When you provide your data to Justice and Care you will be asked to opt in to the different ways we may contact you (email, text, phone and through the post). You have the right to change your preferences, or stopping us contacting you altogether, to do so you just need to contact us.

If you provide us with sensitive personal data, including but not limited to your physical or mental health or condition, you hereby explicitly consent to our use of such data in accordance with this policy as stated above.

You also have the right to request details of the information we hold about you. To exercise that right you should contact the Data Protection Officer at the address given above. We will respond within 30 days of receiving your letter or as otherwise required by law.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Changes to policy

From time to time, we will make changes to this statement to keep it up to date and relevant. You should therefore ensure that you check regularly to see what's changed.

