

## DEAF CONNEXIONS PRIVACY POLICY

### Introduction

This policy describes how and why Deaf Connexions uses your personal information, how we protect your privacy when we use your personal information and your rights and choices regarding this information.

We promise to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect.

Understanding our service users, supporters and volunteers, better through their personal data allows us make better decisions, fundraise more efficiently and helps us to achieve our aims and objectives.

### Privacy Statement

The General Data Protection Regulation (GDPR) [Regulation (EU) 2016/679], provides the legal framework that defines how personal information can be used. Deaf Connexions is fully committed to complying with current data protection legislation and has a legal duty to protect any information we collect from you.

- Your personal information is only used for the purpose for which we collect it
- Only information that we actually need is collected
- Your personal information is only seen by those who need it to do their jobs
- We will not pass your personal information on to any other organisation without your consent unless we are required to do so by law
- Personal information is retained only for as long as it is required for the purpose collected
- We will, where necessary, keep your information up to date
- Your information will be protected from unauthorised or accidental disclosure
- We will provide you with a copy of your personal information on request (please see below for information on access rights and requests)
- Inaccurate or misleading data will be corrected as soon as possible
- These principles apply whether we hold your information on paper or in electronic form.

### How we collect Information about You

We may collect information in the following ways:

- **When you provide information to us directly**  
You may give us your information in order to make use of our services, sign up for one of our events, tell us your story, make a donation or communicate with us.

- **When you provide information to us indirectly**

Your information may be shared with us by independent third parties e.g. online fundraising or donation sites, or by referrals from other organisations e.g. local authorities. These independent third parties will only do so when you have indicated that you wish to support Deaf Connexions and with your consent. You should check their Privacy Policy when you provide your information to fully understand how they will process your data.

- **Social Media**

Depending on your setting or the privacy policies for social media and messaging services like Twitter, Facebook or WhatsApp, you might give us permission to access information from those accounts or services.

- **Information available publicly**

This may include information found in places such as Companies House and information that has been published in articles / newspapers

- **When we collect information as you use our websites**

Like most websites, we use 'cookies' to help us make our site, and the way you use it, better. Cookies mean that a website will remember you. They are small text files that sites transfer to your computer, phone or tablet. They make interactive with a website faster and easier. There are more details in our Cookie Policy.

Also, the type of device you are using to access our website and the setting on that device may provide us with information about your device. This may include what type of device it is, what specific device you have, what operating system the device is using. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

## **What personal data we collect**

When you use our services, we may collect, store and use the following type of personal information:

- Your name
- Your contact details (including postal address, email address, telephone number, social media identity)
- Nature of your enquiry
- Your IP address

We may also collect sensitive personal information such as date of birth, ethnicity and other information required to allow us to review how we deliver our services (which may be due to a contractual obligation under any funding we receive for providing a service), and information about Service Users needs which may include details of a personal nature if this is required for the purpose you have contacted us.

## How we use your information

We may use your personal information to:

- Deal with your enquiries and requests
- Provide you with the services or information you asked for
- Administer your donation or support your fundraising, this may include processing gift aid
- Keep a record of your relationship with us
- Respond or fulfil any requests, complaints or queries you make to us
- Understand how we can improve our services, products or information by conducting consultation
- Obtain your permission to publicise details of your feedback
- Manage our events and activities
- Check for updated contact details against third party sources so that we can stay in touch if you move (see “Keeping your information up to date” below)
- Further our charitable objectives
- Communicate with you
- Contact you if enter your details onto one of our online forms, and you don’t ‘send’ or ‘submit’ the form, to see if we can help with any problem you may be experiencing with the form or our websites
- Display content to you in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or a computer)
- Generate reports on our work, services and events
- Safeguard our staff and volunteers
- Process your application for a job or volunteering position
- Conduct training and quality control
- Audit and administer our accounts
- Meet our legal obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies

For the people that use our services, we will only use the information provided to carry out our work with you and to record information required by the organisation that funds us for the work, as well as for internal administrative purposes such as monitoring the quality of our service.

## Legal basis for processing

Data protection laws mean that each use we make of personal information must have a “legal basis”. The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

- **Legal obligation**

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator, Information Commissioner, or to use information we collect about you for due diligence or ethical screening purposes.

- **Performance of a contract**

We may process your personal information in order to perform our obligations under a service contract.

- **Vital interests**

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance, if there were a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services, or an emergency impacting individuals at one of our events.

- **Legitimate interests**

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their “legitimate interests” (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities Deaf Connexions carries out with personal information. Some additional examples where we are relying on legitimate interests are:

- Updating your address using third party sources if you have moved house (please see the “Keeping your information up to date” section for more on this)
- Use of personal information when we are monitoring use of our websites for technical purposes
- Use of personal information to administer, review and keep an internal record of the people we work with, including supporters and volunteers

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## Sharing your information with Third Parties

We may disclose your information to third parties in connection with the other purposes set out in this policy. These third parties may include:

- Business partners, suppliers and sub-contractors who may process information on our behalf

- Analytics and search engine providers
- IT service providers
- Organisations that fund our work
  - Where we are under a legal or regulatory duty to do so, we may disclose your personal information to the police, regulatory bodies or legal advisors, or where we consider it necessary to protect the rights, property and safety of Deaf Connexions, its staff, volunteers, visitors or service users or others.

## Your Rights

Under UK data protection law, you have rights over personal information that we hold about you. This is summarised below:

- **Right to access your personal information**

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply. If you want to access your information, please contact us at [mail@deafconnexions.org.uk](mailto:mail@deafconnexions.org.uk), 01603 660889 text 07932069352 or write to us at Deaf Connexions, Rotary House, King Street, Norwich. NR1 2BL
- **Right to have your inaccurate personal information corrected**

If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.
- **Right to restrict use of your personal information**

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.
- **Right to delete your personal information**

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.
- **Right for your personal information to be portable**

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.
- **Right to object to the use of your personal information**

If we are processing your personal information based on our legitimate interests or for historical research or statistics, you have a right to object to our use of your information.

If you want to exercise any of the above rights, please contact us by [mail@deafconnexions.org.uk](mailto:mail@deafconnexions.org.uk). 01603 660889 text 07932069352 or write to us at Deaf Connexions, Rotary House, King Street, Norwich. NR1 2BL

We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the Information Commissioner's Office.

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

Where possible, we try to keep your records up to date; for example, using the Post Office's National Change of Address database. However, we really appreciate it if you let us know if your contact details change.

### **Complaints**

- If you are unhappy with any aspect of how we are using your personal information, please contact us. [mail@deafconnexions.org.uk](mailto:mail@deafconnexions.org.uk). 01603 660889. Text 07932069352

Our Complaints Policy is available online in English and BSL.

You have the right to lodge a complaint about how we use your information with the Information Commissioner's Office.

### **Changes to this Policy**

We may change this Privacy Policy from time to time.