



PRIVACY POLICY

1. INTRODUCTION

VASL is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

This Privacy Policy applies to anyone that VASL comes into contact with, including but not exclusively; staff, clients, trustees, volunteers, the general public, professional contacts.

VASL asks its supporters to “opt-in” for marketing communications. This means you’ll have the choice as to whether you want to receive these messages.

You can decide not to receive communications at any time. If you wish to do so please contact VASL by emailing admin@vasl.org.uk, writing to Business Support, VASL, 1st Floor, Torch House, Torch Way, Market Harborough, LE16 9HL or telephoning 01858 433232 (Monday – Thursday 9am to 5pm, Friday 9am to 4.30pm).

We will **never** sell your personal data and we will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

2. QUESTIONS

Any questions you have in relation to this policy or how we use your personal data should be addressed to the Business Support, VASL, 1st Floor, Torch House, Torch Way, Market Harborough, LE16 9HL

4. WHAT INFORMATION WE COLLECT

Personal data you provide

We collect data you provide to us in the course of our usual operations. This includes information you give when joining or communicating with us. For example:

- personal details (name, date of birth, email, address, telephone etc.) when you become a client, staff or volunteer;
- financial information (payment information such as credit/debit card or direct debit details, and whether donations are gift-aided. Please see section 9 for more information on payment security);

- details of your interests and preferences (i.e. which services, projects interest you, to fully benefit from our services); and
- Medical and next of kin information when you register to volunteer, become a staff member or become a client when this is necessary.

Information created by your involvement with VASL

Your activities and involvement with the VASL will result in personal data being created. This could include details of how you've helped us by volunteering or journeys to medical appointments or a carers plan or training and activities you have participated in.

If you decide to donate to us then we will keep records of when and how much you give.

Information we generate

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we may be able to build a profile which helps us decide which of our communications are likely to interest you.

Information from third parties

We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation and concerned relatives. If applicable, you should check their Privacy Notice when you provide your information to understand fully how third parties will process your data.

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Sensitive personal data

We sometimes need to collect or store sensitive personal data with regards to health. These are either to ensure that we are able to provide the right service and suitable environment (e.g. correct car to fit a disabled passenger) or signpost to other relevant services (other agencies that provide support for carers, for example McMillian),

We may also collect information relating to beliefs, sexual preference and ethnic origin. This is for anonymous data reporting to the council and other funders to demonstrate that we do not discriminate. This information could also be used to ensure that there is a more successful match of volunteer with client.

If this does occur, we'll take extra care to ensure your privacy rights are protected.

Accidents or incidents

If an accident or incident occurs on our property, at one of our events or involving one of our staff, volunteers or clients then we'll keep a record of this (which may include personal data and sensitive personal data). We may also be required to share this with the appropriate statutory bodies.

Volunteers and Staff

If you are a volunteer or staff then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us and you (including in the event of an insurance or legal claim) and for safeguarding purposes.

5. HOW WE USE INFORMATION

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided these do not override your rights.

In any event, we'll only use your information for the purpose or purposes it was collected for (or else for closely related purposes) as follows:

a) Marketing

We use personal data to communicate with people, to promote VASL services. This includes keeping you up to date with our news, updates, campaigns and fundraising information.

b) Providing Services and Administration

We use personal data for administrative purposes (i.e. to carry on our charity work). This includes:

- receiving donations (e.g. direct debits or gift-aid instructions);
- maintaining databases of our volunteers, members and supporters;
- performing our obligations under membership contracts;
- fulfilling our services;
- helping us respect your choices and preferences (e.g. if you ask not to receive specific or marketing material, we'll keep a record of this).

c) Internal data analysis

We carry out analysis of the data from our clients, volunteers, supporters and donors, to determine the success of a project, better understand behaviour and responses and identify patterns and trends. This helps inform our work and makes VASL a stronger and more effective organisation. Understanding our supporters, their interests and what they care about also helps us provide a better service.

d) Anonymised data

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, primarily it is used to provide reports to our funders (e.g. National Lottery Community Fund, Leicestershire County Council and Harborough Council) but also to provide case studies and statistics for newsletters and our website, or to identify trends or patterns within our existing supporter base. This information helps inform our actions and improve our services.

6. DISCLOSING AND SHARING DATA

We will **never** sell your personal data. If you have opted-in to communications, we may contact you with information about our partners, or third party services, but these communications will always come from VASL and are usually incorporated into our own communications (e.g. leaflets or articles in magazines or email newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example some specialist services we have offered include counsellor and IT consultant. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another charity). We'll only share information when necessary and for the purposes that you have provided the data to us.

There may be occasions where we share information with third parties where we have a legal duty, where possible we will notify the person when it is our duty to share their data

We may also share information to a third party (e.g. social services), if we are instructed to by a client to further enrich the services they are being provided with. We will always seek verbal consent before sharing any information.

7. MARKETING

VASL will ask its supporters to “opt-in” for marketing communications.

This means you have the choice as to whether you want to receive these messages.

You can decide not to receive communications at any time. If you wish to do so please contact VASL by emailing admin@vasl.org.uk, writing to Business Support, VASL, 1st Floor, Torch House, Torch Way, Market Harborough, LE16 9HL or telephoning 01858 433232 (Monday – Thursday 9am to 5pm, Friday 9am to 4.30pm).

What does ‘marketing’ mean?

Marketing does not mean offering things for sale, it is providing news and information about:

- our charity, campaigns and services;
- volunteering opportunities
- our events, activities and local groups;
- products, services and offers (our own, and those of third parties which may interest you);
- leaving a legacy;
- taking part in projects.

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

Newsletters and magazines

We sometimes send our volunteers and clients newsletters and booklets. We send these out based on the services they are involved with and to what capacity (volunteer or client). However, please be aware that our newsletters and booklets may include fundraising information.

Fundraising

As a charity, we rely on donations and support from others to continue our work. However, we rarely contact our supporters with fundraising material and communications as we already value the support and time we receive.

Data

8. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Electronic data and databases are stored on securely and we control who has access to information.

Web security

All electronic forms that collect personal data from our website will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

Payment security

We use widely recognised third party providers to collect donations: Easy Fundraising and Just Giving. We would never email and ask for your bank details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

9. STORAGE

Where we store information

VASLs operations are based solely in the UK and we store our data within the European Economic Area (EEA) with the exception of one system (which operates largely in Europe and has confirmed that it complies with EEA legislation).

Some organisations which provide services to us may transfer personal data outside of the EEA, however these transfers will be subject to adequate data protections.

How long we store information

Under forthcoming data regulations, we will be required to make sure that we use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. Our data retention policy is available on request.

We will regularly review what information we hold and delete what is no longer required.

10. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);

- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or analysis; and
- where technically feasible, you have the right to see personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to our Business Support, VASL, 1st Floor, Torch House, Torch Way, Market Harborough, LE16 9HL or telephoning 01858 433232 (Monday – Thursday 9am to 5pm, Friday 9am to 4.30pm).

Complaints

You can complain to VASL directly by contacting our data protection officer using the details set out above. If you wish to make a complaint (including a complaint about fundraising activity) which does not directly relate to your data protection and privacy rights, you can do so in accordance with our charity's complaints policy by contacting admin@vasl.org.uk.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office (ICO) which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

12. COOKIES AND LINKS TO OTHER SITES

Cookies

Our website uses local storage (such as cookies) to provide you with the best possible experience and to allow you to make use of certain functionality. For more information check our cookies policy found on our website: <http://vasl.org.uk/about-us/cookies> or <https://www.supportforcarers.org/misc/cookies>

Links to other sites

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by emailing admin@vasl.org.uk).

If an external website requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by

VASL's Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

Social Media Sites

We operate a number of social media pages (including Facebook, Twitter and YouTube). Although this policy covers how we will use any data collected from those pages, it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.