

KEW NEIGHBOURHOOD ASSOCIATION

PRIVACY POLICY

9th March 2020

1. Privacy Policy

Kew Neighbourhood Association (KNA) is committed to protecting your information. This Privacy Policy explains why we collect personal information, how it is used and how we keep it safe. It adheres to the requirements of the General Data Protection Regulation which came into force on 25th May 2018 and which replaces the Data Protection Act 1998.

KNA is the data controller of your personal information. KNA is a registered charity (charity number 1034340). The registered office address is Kew Neighbourhood Association, St Luke's House, 270 Sandycombe Road, Kew, Richmond, Surrey, TW9 3NP.

If you have any questions about this Privacy Policy, please contact our Co-ordinator using our registered office address or by phoning 020 8948 8054. KNA's Office Volunteers are in the office 10am to noon, Monday to Friday (excluding public holidays). KNA's Co-ordinator can also be contacted by telephone on 07951 293 319 or by email at mail@kna.org.uk.

2. Types of personal information we collect and why

KNA aims to inspire a caring community where older people live fulfilling, independent lives knowing that voluntary help, willingly given by neighbours, is at hand. KNA helps combat loneliness and social isolation in older and vulnerable people in Kew, assisting them to live independent and dignified lives. "KNA clients" are those for whom we offer services including driving to medical and social appointments. KNA staff and volunteers (who are screened by the Disclosure and Barring Service) provide the services.

KNA Clients, Staff and Volunteers

Personal information which we collect may include:

- name, date of birth, and preferred title;
- contact information, such as home or work address, email and telephone number(s), and if you use our website your IP address;
- special information relevant to our activities, such as your health and wellbeing, GP surgery and who to contact in an emergency;
- your interactions with us, such as the KNA services you are interested in, use or volunteer for, any feedback, and your use of our website;
- financial information, which might include bank account details and payment history, and whether you are a taxpayer for Gift Aid purposes; and
- preliminary information in relation to possible clients, volunteers and employees and others seeking to contract or to partner or co-operate with us.

Donors

If you wish to make a regular donation to us, we will ask you to set up a standing order and will need your personal details to acknowledge payments. If you wish to make donations via Gift Aid, we will need confirmation from you that you are a UK tax payer through a signed Gift Aid Declaration Form.

Website users

If you visit our website (www.kna.org.uk) we may collect information to assist in managing our websites such as IP address, the pages viewed and when, any referring website and your internet browser.

Our website and other materials may contain links to websites or apps that are owned and operated by third parties. These websites and apps will have their own privacy policies which you should review. We are not responsible for the privacy practices of third party websites or apps so your use of such is at your own risk.

3. How we use your information

We collect the minimum amount of information. Where we use your information, it may be because you consented to us doing so or because we have a legitimate interest to do so. Other reasons include having a legal obligation or to fulfil contractual obligations.

We may use your information in a variety of ways. We use personal information to:

- provide services;
- source and manage volunteers to provide those services;
- understand how our services are used, improve our services and identify, develop and offer new services;
- let you know about our existing and new services;
- attract financial and non-financial support from a wide range of supporters; and
- manage our administrative activities, protect our reputation, rights and assets, and resolve disputes.

We generally rely on explicit consent to use personal information, but also where use may be necessary:

- for compliance with legal obligations e.g. health & safety, maintenance of accounts, laws prohibiting discrimination, cooperation with law enforcement and other government investigating authorities, employment, social security, social protection laws and PAYE
- for the performance of a contract or prior to entering into a contract
- for provision of activities (clients and volunteers), and
- to protect your vital interests or those of some other individual, including when appropriate using carer or emergency contact information.

We will use your contact details to contact you but will not make electronic or telephone contact with you for direct marketing purposes without prior consent, which you can withdraw at any time (usually in the case of email by using the unsubscribe link in the email).

We may provide information to you by post, over the telephone, by e-mail and social media.

4. Sharing your personal information

We do not provide your personal information to any third parties for marketing purposes.

KNA staff and volunteers, other charities and third-party providers we co-operate or partner with in providing services for KNA clients will have access to personal information on a need-to-know basis. Where any personal information is shared, it will only be information relevant to the specific service.

Our policy is not to share personal information with commercial third parties for their own purposes (i.e. separate from any activity they are undertaking on our behalf or at our request or in co-operation or partnership with us).

All personal information is stored on Lamplight, a secure database (for further information on Lamplight and their GDPR compliance visit this [link](http://www.lamplightdb.co.uk/gdpr-faqs/) www.lamplightdb.co.uk/gdpr-faqs/). Third-party suppliers who have access to personal information about you will include in particular:

- (a) the Avenue Club via Lamplight for the sole purpose of viewing the Work Tab to view KNA Drivers in the event of a query (it is agreed between KNA and the Avenue Club that their access to Lamplight is solely for this purpose);
- (b) providers of contractual benefits agreed with employees;
- (c) our independent examiner/auditor while producing financial statements; and
- (d) suppliers of 'cloud' storage on our IT systems ([link](http://www.superhighways.org.uk) www.superhighways.org.uk)

If you are looking to become an employee or volunteer, information about you will be supplied to the Disclosure and Barring Service. If you are an employee, information about you will be supplied to HM Revenue and Customs for tax and social security.

We may make personal information about you available to the police, the Charity Commission for England & Wales (our regulator) and other government entities, but only to the extent permitted or required by law.

5. How we keep your personal information safe

We use anti-virus software and we treat all personal information confidentially. In order to comply with information requests received from regulatory bodies such as HMRC, we need to retain data for a specific period after which the data is destroyed. However, we only retain your personal information for the minimum amount of time required.

Personal information we collect will not be kept for longer than is reasonably necessary. For KNA clients, volunteers and employees (and individuals connected with third party suppliers or other organisations we are in contact with), we will retain most information while you continue to have dealings with us, and usually for not more than four years thereafter.

Personal information will subsequently be deleted completely or anonymised (for example, by aggregation with other data) for statistical analysis and business planning. In the case of former clients, volunteers and employees, we will retain name, date of birth and the period of the KNA relationship for not more than two years after we become aware of their death.

6. Accessing and changing your personal information

You have the right to see what personal information we hold about you and you may request to see it at any time.

You may request for us to change your personal information, for example a change of address or if you feel the data we hold about you is inaccurate. You may also request that we contact you in a particular way, for example by e-mail only or that we stop contacting you altogether.

7. Deleting your personal information

You have the following rights, set out in detail in the law:

- to obtain from KNA confirmation as to whether or not personal information about you is being processed, and, where that is the case, access to that information;
- to require us to correct personal information;
- to require us to erase personal information (“the right to be forgotten”);
- to restrict our use of personal information or to object to such use;
- where we rely on your consent to our use of personal information, to withdraw consent; and
- to “data portability” (of information you have provided which is held electronically).

8. Your right to complain and who to contact

You have the right to complain about how personal information about you is used by us by contacting the KNA Co-ordinator. You also have the right, if you consider that our use of personal information about you infringes the law, to complain to the Information Commissioner’s Office, as supervisory authority. Information on how to do this is available from the Information Commissioner’s Office on its website at www.ico.org.uk and by application to its head office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

9. Updates to this Privacy Policy

This policy will be reviewed every three years and when there are significant legislation changes.