

# Privacy Policy

We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

This Privacy Policy may change so please remember to check back from time to time. This policy was last reviewed in July 2021. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

We are committed to treating you with respect and openness as outlined in our Fundraising & Supporter Promise.

1. Who we are
2. How we collect information about you
3. Information we collect and why we use it
4. Profiling: making our work unique to you
5. Legal basis for using your information
6. Marketing
7. Sharing your information
8. Keeping your information safe
9. How long we hold your information for
10. Your rights

## 1. Who we are

At Welcare, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact us by:

- Writing to Welcare, 19 Frederick Crescent, London, SW9 6XN
- Calling us on 0207 820 7910
- Emailing to [info@welcare.org](mailto:info@welcare.org)

## 2. How we collect information about you

Everything we do, we do to ensure that we can help children, young people and families through challenges and crises. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event, sign up to our communications or make a donation.

We collect information from you in the following ways:

**When you interact with us directly:**

This could be if you ask us about our activities, register with us for training or an event, make a donation to us, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This can include when you phone us, visit our website, or get in touch through the post, or in person.

**When you interact with us through third parties:**

This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

**When you visit our website:**

We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use “cookies” to help our site run effectively. Find out more about ‘Cookies’.

We use this information to improve our website and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

**From other information that is available to the public:**

In order to tailor our communications with you to your background and interests we may collect information about you from publicly available sources or through third party service providers (we have provided further details about this below – see ‘Profiling: Making our work unique to you’).

### 3. Information we collect and why we use it

**Personal Information**

Personal information we collect may include details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making a purchase or donation), as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering for an event, applying for a role or any of the other ways of interacting with us.

We will mainly use this information:

- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions
- To provide the services you have requested
- To update you with important administrative messages about your donation, an event or services
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations
- To keep a record of your relationship with us
- Where you volunteer with us, to administer the volunteering arrangement

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide services you have requested.

We may also use your personal information to contact you about our work and how you can support Welcare (see section 8 on 'Marketing' below for further information).

### **Sensitive Personal Information**

If you share your personal experience or the experiences of a friend or relative, we may also collect this health information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work telling people's personal stories (for example, in our enewsletter).

### **A special note about the Sensitive Personal Information we hold**

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you choose to provide details of a sensitive nature we will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation
- Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it in our enewsletter or on our website

### **4. Profiling: making our work unique to you**

We want to improve how we talk to you and the information we provide through our website, services, and information. To do this we sometimes use profiling and screening methods so that we can better understand our supporters, your preferences and needs to provide a better experience for you.

We may carry out targeted fundraising activities using profiling techniques based on the information that we hold about you. We may also work with third party organisations who provide additional insight, this may include providing wealth screening information or general information about you that is publicly available, such as updating your address if you have moved. This information can be appended to the information that you have provided which allows us to use our resources more effectively by better understanding the background of our supporters and making appropriate requests based on what may interest them and their capacity to give.

You can of course opt out of this activity at any time. To do this, email [fundraising@welcare.org](mailto:fundraising@welcare.org) with the subject line 'Please stop analysis of my data' or by writing to Welcare, 19 Frederick Crescent, London, SW9 6XN or by phone on 0207 820 7910.

## 5. Legal basis for using your information

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfill a contract with you (for example, because you have registered for an event).

However, there are other lawful reasons that allow us to process your personal information and one of those is 'legitimate interest'. This means that the reason that we are processing information is because there is a legitimate interest for Welcare to process your information to help us to achieve our vision of ensuring that all children have the best start in life.

Whenever we process your personal information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

## 6. Marketing

We will only contact you about our work and how you can support Welcare by email, phone, or text message, if you have agreed that we can contact you in this manner.

However, if you have provided us with your postal address we may send you information about our work and how you can support Welcare by mail unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting [fundraising@welcare.org](mailto:fundraising@welcare.org) or clicking the unsubscribe link at the bottom of the relevant communication.

## 7. Sharing your Information

The personal information we collect about you will primarily be used by our staff (and volunteers) at Welcare so that we can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities nor do we sell any information about your web browsing activity.

We may however share your information with our trusted partners and suppliers who work with us or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. Some examples of where we may share your information are with our fulfilment partners who help to create and send information to you to reduce our costs, or with data audit companies who help 'clean' our database.

We enter into contracts with these service providers that require them to comply with Data Protection laws and ensure that they have appropriate controls in place to secure your information.  
Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

## 8. Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

Any debit or credit card details which we receive on our website are passed securely to Blackbaud Merchant Services, our payment processing partner, according to the Payment Card Industry Security Standards.

## 9. How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

## 10. Your rights

You have rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at Welcare, 19 Frederick Crescent, London SW9 6XN, by email at [info@welcare.org](mailto:info@welcare.org) and by phone on 0207 820 7910. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

- **Access to your personal information:**

You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity

- **Right to object:**

You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection

- **Consent:**

If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time

- **Rectification:**

You can ask us to change or complete any inaccurate or incomplete personal information held about you

- **Erasure:**

You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it

- **Portability:**

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred

- **Restriction:**

You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it

- **No automated-decision making:**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

To find out more about this policy and how we look after your personal information, contact us at [info@welcare.org](mailto:info@welcare.org) or on 0207 820 7910.

# Our use of cookies

Last updated: 22.06.2022

## What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

## How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

## Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies.

## The Cookies We Set

### Forms

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

### Customisation

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

## Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

## Google Analytics

This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.

## Social media

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work, social media sites including Facebook and Twitter will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

## Embedded content

Some of the content on our site may be provided by third parties. This includes but is not limited to: Google Maps for interactive mapping, YouTube or Vimeo for hosted video and Flickr for images. When you visit a page containing content from one of these sites a cookie may be set. We do not have any control over these cookies and you should check the relevant third party website for more information about these.

## More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.