

Privacy Policy

March 2019

Table of Contents

1.	Introduction.....	2
2.	Data Protection.....	3
3.	Our Privacy Policy in Brief.....	4
4.	Who are we?.....	6
5.	What information do we collect? Where do we get it from?.....	7
	a) Information that you give us directly.....	7
	b) Information that you give us indirectly.....	8
	c) Information that we collect from your use of our websites.....	8
	d) Information from third parties.....	8
	e) Information from public sources.....	8
	f) Sensitive/special categories of data.....	8
	g) Under 18s/School attendance age.....	9
6.	How do we use personal data?.....	10
	a) Love for Life's websites and cookies.....	10
	b) Google Analytics – currently not applicable.....	10
	c) Links to other websites.....	11
	d) Do we sell or share personal information?.....	11
	e) Sensitive/special categories of data.....	11
7.	What is our legal basis for processing data?.....	12
8.	Who has access to your personal information for processing data and how do we keep it safe?.....	14
	a) Storing your information.....	14
	b) Payment by credit or debit card.....	14
	c) Sharing your information.....	15
9.	How long do we keep your data for?.....	16
10.	What are your rights.....	17
11.	Complaints, compliments or comments.....	18
12.	Changes to the Privacy Policy.....	19

1. Introduction

Love for Life is committed to protecting your data and your privacy. We aim to ensure that any information you give us is held securely and safely. Having a positive relationship with our supporters, clients and partners is vitally important to us and we are committed to working in a transparent, ethical, responsible and honest way.

Please read this policy carefully, along with any other documents referred to in this policy, to understand how we collect, use and store your personal information.

We are committed to protecting your personal information and being transparent about what information we hold about you, whether you are a supporter, client or partner.

This policy explains how we collect and use the personal information you provide to us, whether this is online, in person or via phone, mobile, email, letter or other correspondence or printed form, and personal information about you that we may obtain from third parties.

Love for Life holds and processes personal details in accordance with the Data Protection Act 1998 and is registered with the Information Commissioner.

If you use our websites or any of our services, or provide us with any personal information, we will bring this policy to your attention so that you are fully aware of how your information will be used and disclosed.

2. Data Protection

Love for Life takes data protection very seriously.

As you use our website, get in touch with us, book our programmes, or take part in our campaigns and activities, we collect information. This deepens our understanding of what you are interested in and helps us to improve the quality and relevance of all of our communications.

Love for Life will never share your information with another organisation for their own marketing purposes and we will never sell your information for any reason whatsoever. We know that this is important and want to reassure you that you are always in control of how we use your personal information in regard to marketing and fundraising activities.

We do however need to collect and use your personal information for carefully considered and legitimate business purposes, which will help to ensure that we can run Love for Life efficiently, raise funds effectively and deliver our charitable programmes.

This policy will set out what data we collect, how we will use it, what the legal basis for this is, and outline what your rights are in respect of your personal data.

3. Our Privacy Policy in Brief

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are - but if you don't have time to read it all now, here's a quick summary:

We collect information from different people who engage with Love for Life (volunteers, donors, prayer supporters, Directors, youth workers etc)

- We collect information that is personal data. Personal data is information that can be used to help identify an individual, such as name, address, phone number, email address, IP addresses or website pages accessed
- We collect information about everyone who engages with Love for Life. This includes, but is not limited to; volunteers, teachers, financial supporters, staff, directors and youth workers
- We collect information to provide services or goods, to provide information, to fundraise for our work, to inform supporters, resource our activities and fulfil our charitable objectives and for administration. This information may also be used for research and wealth screening, analysis, and for the prevention or detection of crime
- We only collect and use information which we need or which you have agreed that we can use
- We are careful with your information and work hard to make sure it is held securely
- We do our best to keep personal information secure wherever we collect personal data online
- We never sell your data and we will never share it with another company or charity for their own purposes
- We endeavour to make it as easy as possible for you to update your information, withdraw your consent, and access your information
- We only share data where we are required by law or with carefully selected service providers who carry out work for us. We recognise the importance of ensuring that all our service providers treat your data as carefully as we would, use it only as instructed, and allow us to check that they do this
- We only keep your information for as long as we consider it necessary and reasonable. Our data retention policy takes into account our legal obligations, insurance recommendations, and accounting and tax consideration

These are the key points of the privacy policy. You will find the policy in full below, so you've got all the details you need.

This policy applies to all the digital channels we operate, our use of emails and postal mailings for marketing and charitable purposes, and any other methods we use for collecting and using information. It covers **what** we collect and **why**, **what we do** with the information, **what we won't do** with the information, and what **rights** you have.

4. Who are we?

Love for Life is an independent Christian charity, working to equip young people with the knowledge, skills and values necessary to make good choices when it comes to relationships and sex. Based in Waringstown, Love for Life's vision is to influence change in society so that young people value themselves, relationships and sex.

Love for Life's charity registration number is NI 102325. Love for Life is also registered as a Company Limited by Guarantee, Company No. NI 43026.

Love for Life is registered with the Information Commissioner's office (ICO) as a data controller, registration number: **INSERT**

Love for Life's registered address is: 6 Banbridge Road, Waringstown, Craigavon, BT66 7QA

For more information about our privacy policy and data protection, please contact us by:

- Emailing data@loveforlife.org.uk
- Writing to our Data Protection team at our registered address
- Calling us on 028 3882 0555

5. What information do we collect? Where do we get it from?

We will only ever collect the information we need - including data to help improve our services – or which you agree we can collect.

Personal data is any information that can be used to identify you. For example, it can include information such as your name, email address, postal address, telephone number, mobile telephone number, bank account details, credit/debit card details, and whether you are a taxpayer so that we can claim Gift Aid on any donations you may make. It also includes Internet Protocol (IP) addresses (the location of the computer on the internet), details of pages visited on our websites and files downloaded.

The vast majority of personal data we hold is given to us directly by our supporters, customers, beneficiaries, staff and volunteers in the course of them interacting with our services, websites, or charitable activities. We may also receive your personal information when you donate to Love for Life through third-party services such as Just Giving, MyDonate, or Paypal.

We may occasionally use third party organisations to provide us with further details of individuals who have expressed an interest in Love for Life and have agreed to receive communications from Love for Life.

In some situations we may update our supporters, clients, staff and volunteers personal information using other agencies; for example, to check we have a valid and deliverable postal address, or to check if you are on the telephone preference service or fundraising preference service

We collect information in the following ways:

a) Information that you give us directly

We collect this information in connection with specific activities, for example, when you use our websites or printed forms or telephone our offices to:

- i. Make a programme or event booking
- ii. Make a donation to us
- iii. Register for an event
- iv. Sign up to one of our email newsletters
- v. Engage with our social media
- vi. Apply for a volunteer or paid role
- vii. Complete a survey, questionnaire or feedback form
- viii. Or otherwise provide us with personal information by any other means

Please note: You don't have to disclose any of this information to browse our websites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

b) Information that you give us indirectly

Your information may be shared with us by fundraising sites like MyDonate or JustGiving. These independent third parties will only do so when you have indicated that you wish to support Love for Life and with your consent. You should check their privacy policy when you provide your information to understand fully how they will process your data.

c) Information that we collect from your use of our websites – *currently not applicable*

Website usage information is collected using cookies. This helps us to see how many people use our websites, how many people visit on a regular basis, and how popular individual pages are. Cookies are also essential to our websites running correctly and delivering goods and services to users.

d) Information from third parties

We may receive information about you from third parties, for example a friend/colleague who makes a booking for a programme, registered for an event or make a donation in your name.

We may receive updated delivery and address information from our delivery agents so that we can correct our records and deliver your next purchase or communication more easily. If we receive information about you from third parties, we will provide you with details of whom we received it from as soon as possible thereafter.

e) Information from public sources

We may combine information you provide to us with information available from public sources or records in order to gain a better understanding of our supporters or customers and those who engage with us. This helps us to improve our charitable activities, fundraising methods, resources and programmes. Such information may be found in places such as Companies House and information that has been published online and in print.

f) Sensitive/special categories of data

Data Protection law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data or special categories of data and covers health information, race and ethnicity, religious or philosophical beliefs and political opinions amongst other things.

We do not collect sensitive personal information about you unless there is a clear reason for doing so, such as involvement in an event where we need this information to ensure safeguarding, to carry out appropriate checks on volunteers, or care for participants. For some events we will collect health information so that leaders on our events have the relevant information to care for participants - i.e. dietary requirements. We will also collect generic religious and/or philosophical information in order to communicate our charitable activities to you relevantly and effectively.

When we collect this information, we will make it clear to you what we are collecting and why and what are our legitimate interests or other legal grounds for processing this information.

g) Under 18s/School attendance age

If you are aged 18 or under and would like to participate in an event, make a donation or get involved with us, please make sure that you have your parent or guardian's permission before giving us your personal information.

When we collect information about a child or young person, we will make it clear why we are collecting this information and how it will be used.

Children from 13 upwards may give their own consent in relation to any online services that we may offer.

During, or shortly after, the delivery of our programmes, we will collect feedback from under 16s in relation to their experience of the programme. In this process we will ask participants their age, gender and some specific questions around health and identify issues the programmes have addressed. We will not collect and actively advise students to not put their name, date of birth, or any other identifier on these forms to ensure anonymity. If a form is received with a name, it is destroyed securely as soon as possible with no information being recorded.

6. How do we use personal data?

We may use the personal data that you provide in the following ways:

- To process any donation(s) we may receive from you, to claim Gift Aid on these donations and to update you on how your donations are being used
- To process programme or event bookings
- To set up direct debits, standing orders and one-off card payments
- To provide you with information that you have requested about our work or our activities
- To provide you with information about other resources, events or programmes we offer that are similar to those you have already purchased or enquired about and to which you have not objected to receiving
- To provide you with information that you have requested about a paid or voluntary role
- To communicate with supporters
- To record the contact that we have with you
- To provide you with information about Love for Life and how you can support our work as a charity (where you have consented to receiving this information as applicable)
- To invite you to participate in surveys or research
- For administration purposes, e.g. we may contact you about a donation you have made or event you have expressed an interest in or registered for
- For internal record keeping, such as the management of feedback or complaints
- To notify you about changes to our services
- To analyse and improve the services we offer
- To analyse the use of our websites and ensure their content is presented in the most effective manner for you and your device
- To further our legitimate charitable aims such as sending you information about how donations are being used or sending you an annual report or update
- You can choose at any time which marketing materials you want to receive from Love for Life and in which format. If there is something you would prefer not to receive, please contact us by emailing: data@loveforlife.org.uk, writing to our Data Protection team at our registered address or calling us on 028 3882 0555.

a) Love for Life's websites and cookies – *currently not applicable*

Like many organisations, we use cookies to help us make our websites – and the way you use them – work better and to track information about how people are using them.

b) Google Analytics – *currently not applicable*

We use Google Analytics and other services to collect information about how our websites are used. These help us to know how often users visit our websites, what pages they visit when they do so, and how they use our content online.

c) Links to other websites

Our website contains links to other websites belonging to third parties and we sometimes choose to participate in social networking websites including, but not limited to, YouTube, Facebook, Twitter, Pinterest and Instagram.

We may also include content from websites such as these on our website. However, we do not have any control over the privacy practices of these other websites. You should make sure when you leave our website that you have read and understood the other website's privacy policy in addition to our own.

d) Do we sell or share personal information?

We never sell or share your personal information with other organisations to use for their own purposes.

However, if we run an event in collaboration with another named organisation, your details may need to be shared with them and those who provide services to help us deliver the event. We will make it clear what will happen to your data when you register.

e) Sensitive/special categories of data

If you provide us with sensitive/special categories of personal data including, but not limited to, your racial or ethnic origin, political opinions, religious or philosophical beliefs or your physical or mental health, we will only use this for the specific purpose for which you gave permission and where it is within our legitimate interests to process or where we have other legal grounds to do so.

7. What is our legal basis for processing data?

Love for Life, like all organisations in the UK/Ireland, needs a lawful basis to collect and use your personal data.

The law allows for six legitimate purposes which organisations can rely on to legally process people's personal data. Of these, only four are relevant to charities for the type of activities listed above:

- Information is processed on the basis of an individual's consent
- Information is processed in line with a contractual relationship
- Information is processed on it being a legitimate interest for Love for Life to do so
- Where we are fulfilling a public task, or acting under official authority

We may also share your personal information when we are compelled to do so by a legal authority acting in compliance with the law.

We use a contractual basis for processing data relating to purchases of services or resources you have ordered and events you have booked. This includes sending you Love for Life news and other information with your subscription.

We rely on legitimate interests for a variety of purposes. Legitimate interest is about balancing the interests of Love for Life against your rights and freedoms and having due regard to your reasonable expectations about the use of your data.

These purposes include:

- mailing you information about related resources and events that you might be interested in, given your previous purchases
- mailing other information about Love for Life such as our annual report or update
- thanking (either by email, mail or telephone) those of you who have made a financial gift
- research and wealth screening activity to better tailor any financial requests we make of you so that they reflect your specific interests in Love for Life's mission and are at an appropriate financial level
- We also rely on the legitimate interests legal basis to share with you the fundraising needs of the charity and to ask for your support, given your engagement with Love for Life's resources, events and programmes, provided that we have also previously obtained any additional consents required to send this information to you in particular formats. For example, we will not send fundraising information or requests to you by email or other electronic means or via automated telephone calls where you have not opted in to these formats beforehand. You can let us know at any time if you would prefer not to receive these communications.

We use your consent for all the email newsletters delivered by any of the activities and programmes run by Love for Life. Every email newsletter you receive provides a clear opportunity for you to opt out of/unsubscribe from future email newsletters.

We use compliance with a legal obligation as the basis for processing any legally required activities such as Gift Aid returns to HMRC.

8. Who has access to your personal information for processing data and how do we keep it safe?

We maintain a high level of security in relation to the collection, storage and disclosure of your information. This is very important to us and we take all necessary steps to ensure that any information we hold about you is safe.

a) Storing your information

We place great importance on the security of all personal data associated with our subscribers, supporters and customers.

Information is stored by Love for Life on secure servers at our offices, encrypted off-site back-ups and in the Cloud. We may also store information in paper files.

We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are able to access personal information, we ensure access to information is password protected or secured via locked filing cabinets and any financial information you input is encrypted by our 3rd party partners before it is sent to us.

While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Any sensitive or special categories of data you may provide to us are only shared on an absolute need to know basis and are deleted after each relevant event unless we need to keep that information for a longer period e.g. for safeguarding reasons.

We enforce strict procedures and security features to protect your information and prevent unauthorised access, although we cannot completely guarantee the security of any information you transmit to us.

b) Payment by credit or debit card

If you use your credit or debit card to donate to us, buy something or pay online or over the phone, we will ensure that this is done securely and in accordance with the Payment Card Industry Data Security Standard. Find out more information about PCI DSS standards by visiting their website at www.pcisecuritystandards.org.

Only those staff authorised to process payments will be able to see your card details. Once your transaction is completed, we do not store your full credit or debit card details.

All transactions online are processed by DonorBox. We do not process offline card payments

We hold bank account details for the purpose of collecting direct debits in accordance with direct debit mandate rules.

c) Sharing your information

Love for Life does not sell or share any information about you to other organisations.

Love for Life may disclose your personal information only in the following circumstances:

- a. To third parties who provide a service to us and are our data processors. We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, processing credit card payments, and providing customer service. These data processors have access to personal information needed to perform their functions but may not use it for other purposes. We require these third parties to comply strictly with our instructions and data protection laws and will make sure that appropriate controls are in place.
- b. Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies), or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect Love for Life (for example in cases of suspected fraud or defamation).

9. How long do we keep your data for?

We have a retention policy for every personal data set. We will hold your personal information on our systems for as long as is needed to fulfil the function for which we hold the data or as long as is required by law for the relevant activity. For example, HMRC requires us to keep a record of donations, Gift Aid and financial transactions for seven years.

If you request that we stop sending you marketing or fundraising information, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us until 24 months after a legacy gift is received, or until we are notified that Love for Life is not a beneficiary from the estate, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where your information is no longer required, we will ensure that it is disposed of in a secure manner.

Information will only be kept as long as is necessary for the purposes for which you provided it, or we obtained it and will be minimised to ensure we only keep what is necessary.

10. What are your rights

We'd like to keep all who engage with Love for Life up to date with our progress. So, to update you on what we're doing and ask whether you are able to support us, we'd like to keep in touch with you (by post, phone, email, text and other electronic means) about our progress and how you can continue to help us in this important mission.

We will not use your information for marketing or fundraising purposes if you have asked us not to or we do not have your permission to use it for these purposes (in certain circumstances we must obtain your permission before we contact you for marketing or fundraising purposes). However, we will retain your basic details on a suppression list to help ensure that we do not continue to contact you.

If you are registered to receive one of our email newsletters, every email communication provides a clear opportunity for you to opt out of/unsubscribe from future email communications.

The Data Protection Act and the General Data Protection Regulation give you certain rights over your data and how we use it. You have the right to:

- request a copy of the information we hold about you and details of what we do with that information (known as a subject access request)
- update or amend the information we hold about you if it is wrong
- change your communication preferences at any time
- withdraw your consent to use of your personal information where we are relying on consent as the legal ground for processing it
- ask us to remove your personal information from our records
- ask us to restrict the processing of your personal information
- obtain a portable copy of certain personal information where this is processed automatically
- object to the processing of your information for marketing purposes
- raise a concern or complaint about the way in which your information is being used
- ask us to explain any automated processing we carry out and the impact of this on you

If you wish to exercise any of these rights, please contact our Data Protection team in writing at our registered address.

If we are not sure who you are, we may ask for reasonable proof of your identity before providing you with information or carrying out any of the above actions.

11. Complaints, compliments or comments

If you are unhappy with our work or something that we have done or failed to do, we want to know about it. We also welcome your views on what we do well. Your comments enable us as an organisation to learn and continuously improve our services. You can get in touch with us by emailing: data@loveforlife.org.uk, writing to our Data Protection team at our registered address or calling us on 028 3882 0555.

If you wish to raise a data protection concern or complaint with a supervisory body, you can address a complaint to the Information Commissioner's Office. For more information, visit www.ico.org.uk.

12. Changes to the Privacy Policy

We keep this policy under regular review. If we make any significant changes in the way we treat your personal information, we will make this clear on our websites or by contacting you directly.

Details of the sections of the policy that have been changed will be noted here.

You do not have to agree to any changes if these are not compatible with the initial purposes for which you provided or we collected your data.

First published: March 2019

Last updated: July 2019

For further information please contact:

Simon Newell
Love For Life
6 Banbridge Road,
Waringstown,
Craigavon,
Northern Ireland BT66 7QA

Email: data@loveforlife.org.uk

Tel: 028 3882 0555

Love for Life is a Company Limited by Guarantee, registered in Northern Ireland as a charity. Company No. NI 43026. Charity No. 102325