

## Privacy Notice

### About Us

Formed in 2002, Love for Life is a Christian charity and has a long-standing reputation for engaging effectively in the specific area of Relationships and Sexuality Education (RSE).

We deliver holistic Relationships and Sexuality Education (RSE) in all school types and in many different community settings across Northern Ireland. Our programmes for young people, parents & carers aim to inspire, equip and resource the next generation to know their worth, flourish in their relationships and value their sexual choices.

Love for Life holds and processes personal details in accordance with the The General Data Protection Regulation and Data Protection Act and is committed to ensuring that any information given is held securely, processed in the way in which it was intended and to working in a transparent, ethical, responsible, and honest way.

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's registered address is: 6 Banbridge Road, Waringstown, Craigavon, BT66 7QA.

## When and how we collect information

We only collect personal information for specified purposes. We only keep data for as long as we consider it necessary and reasonable, or as legally required to do so.

Most personal information we collect, and hold is given to us directly and with consent. We may also process information on a contractual basis and when we believe there is a legitimate interest to do so.

In some situations, we will use other agencies to verify personal information such as to check we have a valid and deliverable postal address, or to check if you are on the telephone or fundraising preference service lists.

We collect information in the following ways:

### Information you give us directly

We collect personal and corporate information in connection with specific activities through our website, phone, email and printed forms. These activities include, but are not limited to:

- Fulfilling a contractual agreement (e.g. booking one of our programmes)
- Processing a supporter request (e.g. a donation, request to receive materials or information, request to be removed)
- Applying for a volunteer or paid role
- Participation in a survey or research
- Administrative purposes (e.g. gift aid claim, management of feedback or complaints, recording the contact we have with you)

### Information that you give us indirectly from third parties

If you give them consent, we collect information from third parties such as event organisers (fundraising events), or sites such as JustGiving, Stewardship or MyDonate when you donate or fundraise for Love for Life. You can check their privacy policies for more information.

We may also collect your personal information from a person (e.g. a colleague) who has made a booking, registered for an event, or made a payment/donation on your behalf.

### When you visit our website

We may collect personal information about people who visit our website using cookies and third-party analytical tools such as Google Analytics. The information collected does not identify you directly but does show us how users are arriving at our website, where they are located and what pages people visit most often. Using cookies helps us know if our website is working well and helps us improve the user experience.

### Information you put online

We may gather information that people make available on places such as Facebook and Twitter. For organisations such as schools, trusts, youth organisations and churches, we may additionally gather and verify our information from your public website, directory listing or governing body such as The Education Authority or a denomination website.

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**Publicly available data**

We may combine information you provide to us with information available from public sources or records such as Companies House, Charity Commission, articles, newspapers, and blogs. This helps us to improve our charitable activities and the accuracy of the data we hold.

**Sensitive data**

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 may collect health information, such as dietary requirements, so that leaders at our events have the relevant information to care for participants. We will also collect generic religious and/or philosophical information 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.

As a Christian charity, we may process personal data relating to your denomination, church you attend or role you play within a religious organisation. We will only do this where you tell us you are happy for us to use this information, or where you choose to make this public (e.g. on your church website).

## Our basis for processing

We rely on four of the six legitimate purposes to legally process personal information:

- 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.

### Consent

The majority of our marketing and supporter communications relies on consent. All of our email and print communications will have a clear opportunity for you to opt-out or change your preferences.

### Contractual Relationship

We may process your information to fulfil a pre-agreed service based on our contractual relationship.

### Legitimate Interest

We may use Legitimate Interest to process your data to:

- Contact you regarding similar or related products/services
- Invite you to events or gatherings
- Analyse your information to improve our fundraisings, marketing or services
- To update you on related charitable activities or reports
- Share with you the fundraising needs of the charity and to ask for your support - provided that we have also previously obtained any additional consents required to send this information to you in particular formats

### Compliance

Fulfilling our legal obligation in processing or holding legal required information such as Gift Aid Claims.

## What we do with your data

### Processing a request to fulfil a service, process a donation or associated activities

We may use your personal information to:

- Send you information you request relating to our products and services
- Provide information relating to your order or booking and any related updates
- Request feedback on the service or product we delivered
- Contact you about similar products or services
- Invite you to take part in a survey
- Send you reports on our charitable activities
- Tell you more about our work
- Process donations you give us, support a fundraising initiative, and claim Gift Aid
- Encourage financial support and non-financial support such as volunteering or prayer
- Keep records of your relationship with us, including opt-out of requests to be removed
- Provide more information or printed resources you've asked for
- Improve website experience

### Personalised Marketing

We may use your personal information to:

- Send you information that we believe is relevant to your job, location or interests
- Invite you to be involved in fundraising activities based on previous engagement
- Tailor marketing communications to suit your location, previous engagement with us or interests
- Improve our marketing and fundraising strategies
- Understand whether you are able and want to start, or increase your financial support for us
- Engage with organisations we know you are associated with or have links to

### Social Media Marketing

Where you have provided your email address with consent for us to market to you, we may reach out to you by using Facebook advertising. We may also reach out to people who have similar interests to you through Facebook. For example, we might use Facebook's Custom Audience Programme.

There are more details on Custom Audiences at [Facebook Business](#), and [you can read Facebook's Privacy policy here](#). Facebook also allows you to have a say in the ads you receive. [You can find out more here](#).

We may also use tracking pixels to re-target users based on website usage.

### Applying for a job or volunteer role with us.

When you supply us with an application or CV, we will use this information to:

- Recruit for the role
- Contact you in relation to your application
- Complete reference checks, qualifications checks, criminal referencing, service checks and verify your information.

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Your information will only be shared with those involved in the selection and recruitment process.

### **Research**

We have a legitimate interest to improve our services and demonstrate our organisational effectiveness. We may collect and use information to provide reports to analyse and further understand service delivery, service users or supporter needs.

### **Under 18s**

If you are aged 18 or under and would like to participate in an event, donate or support 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.

### **Evaluation Forms**

In agreement and partnership with the school/organisation, pupils/young people may be invited to fill out an anonymous evaluation form at the end of our post-primary or Open Up presentations if they're comfortable and happy to do so. Participants may be asked for what is defined as sensitive information (such as age, gender, health and identity issue the programmes have addressed).

Love for Life uses the responses collated in the Evaluation Forms for three purposes:

1. To produce a report of the anonymous evaluations for the teacher/youth worker who made the booking to allow them to review the needs and responses of their young people to aid their delivery of effective RSE (The Individual responses are not supplied to the school/organisation).
2. To identify key trends in the behaviours and attitudes of young people
3. To continually review and improve the quality of the programmes we deliver

We do not request or collect personal information that identifies a person directly. We actively advise participants not to put their name, date of birth, or any other identifier on the evaluations to ensure anonymity. If an Evaluation Form is received with an identifier, it is destroyed securely as soon as possible with no information being recorded.

All Evaluation Forms are securely stored for one year after they are recorded on our survey system, after which they are shredded.

We will take all reasonable steps to ensure it is our staff that supervise the completion and collection of Evaluation Forms, to maintain anonymity of those who have, or have not, completed them.

In some circumstances, the Evaluation Forms may be completed and collected under the supervision of the school. If this is to happen, the contact teacher will be provided with:

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- Our best practice guidelines for facilitating the completion and collection of Evaluation Forms
- Clear guidance on their responsibility to maintain confidentiality and our expectation for them to do so

## How and where we store your information

### Sharing your information

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 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 may share your personal information with another named organisation who we are collaborating with to run a service such as an event. 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.

### Sharing your information by law

We may need to pass on information if required by law or if a regulatory body, like HMRC, or the police ask us to.

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).

### How long we store your data

We have a separate retention policy that guides how long we retain personal information, depending on the activity, our legal obligations, and internal requirements.

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.

Depending on the nature of your engagement, activity or request, some data may be:

- Archived, then deleted within 30 days
- Archived, then anonymised
- Partially anonymised to allow us to comply with our legal obligations such as HMRC
- Deleted with immediate effect

Information will only be kept for as long as it 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.

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## Security

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. We maintain this by:

- Having the right technology for the required processing and handling
- Ensuring only staff and volunteers who require the information to do their job have access to it
- Ensuring staff and volunteers are adequately trained in data protection
- Having robust policies and procedures in place that are regularly reviewed

## Credit / debit card security

If you use your credit or debit card to donate to us, buy something 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](http://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 Stripe & 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.

## Where we store your personal information

Most of our data is processed using cloud-based systems. We will normally keep your information in the UK but may transfer your personal information within or outside the European Economic Area (EEA) for the purposes of cloud storage - for example, processors based in the European Union or the USA, where they are certified to the EU-US Privacy Shield such as Google, Salesforce and Campaign Monitor.

Additionally, information is stored by Love for Life on secure servers at our offices, encrypted off-site back-ups and in some selected cases, in paper files such as Gift Aid Declarations.

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.

## Cookies

Also known as browser cookies or tracking cookies, cookies are small, often encrypted text files, located in browser directories. They are used by web developers to help users navigate their websites efficiently and perform certain functions. Cookies tell us, for example, about traffic data, location data, device information, the date and time people visit and the pages they visit.

The information collected does not identify you directly

Most websites use cookies – you can find out more at <http://www.allaboutcookies.org>.

### Data may be collected anonymously to help us:

- Customise what you see when you land on our website
- Help us understand what users are doing and interacting with
- Process requests or transactions
- Conduct internal reviews and analysis
- Inform and direct advertising on social media

All web browsers will allow you to turn cookies off. However, our website may look different and we may not be able to complete all tasks you request.

### Third Parties

Love for Life also uses companies like Facebook, Yoast and Google Analytics, which may use cookies. This helps us understand how well our website is serving the needs of you the user, what pages are popular and what needs updated or fixed.

They may also use tracking pixels, which tell us how effective our adverts are.

We don't control the setting of these cookies, so check those websites for more information and to opt-out.

## Your rights and telling us when things change

If you want to change what we send you, or how we contact you, just let us know.

### Updating your details

It's really helpful if you keep your details with us up-to-date.

Sometimes we use a Post Office address search or postcode lists etc to check data you send us.

We won't use these sources to gather information you haven't given us, for example if a telephone number. Nor will we automatically update changes of address – we will normally only update your address when you tell us it's changed.

### Your rights

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.

Whenever you engage with us, we'll process your information as explained in this policy. When you provide your information, you're agreeing to this policy. If you don't agree, please don't give us your data.

## 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](mailto: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](http://www.ico.org.uk).

## 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.

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Date of Change:	Reason for Change:	Authorised By:
10 March 2020	Google Analytics now active	SN
10 Nov 2020	Permitted sharing outside EEA for cloud storage	SN
22 Nov 2021	Policy reviewed in full	SN
4 April 2022	Evaluation Form section updated	SN

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For further information please contact:

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Tel: 028 3882 0555

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