

Privacy Notice

At Hollybank, we are committed to protecting and respecting the privacy of our service users, their families, employees, website visitors, supporters, suppliers or anyone who might come into contact with us.

This privacy notice explains how and why we collect personal information and what we do with this information. There may be additional information available to you if you are an adult or child who uses our services, if you are applying for vacancy or if you are an employee, so please refer to those documents as well.

We may change this document from time to time, so please check this page occasionally to ensure that you are happy with any changes.

We have a privacy team including Data Protection Officer, Senior Information Risk Owner and Caldicott Guardian. They can be contacted directly at the Trust on 01924 490833 or data.protection@hollybanktrust.com

What Personal Data do we hold?

The information we collect will depend on how you are interacting with us, but may include your name, address, phone number, email address, comments or image. We may also collect your financial details if necessary.

If you are a volunteer we may collect extra information about you such as reference, criminal record checks, details of emergency contacts and medical conditions.

If you visit our premises we may have CCTV images of you as you move around the site.

Cookies – We use cookies to monitor and track website usage and improve the quality of our website. We look at, the number of visitors we receive, our total page views and monitor which pages are most popular. We also monitor how users reach our website (such as through Facebook or Google search). The information we collect is anonymous and we do not collect personally identifiable information. When you visit our website, you can turn off this feature by clicking the “opt out” cookie pop-up.

Information about other people

If you provide personal data to us relating to any person other than yourself, you must ensure before you do so that they understand how their personal data will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf. You should bring this privacy policy to their attention.

How do we collect information from you?

We collect personal data from you in connection with specific activities such as registering to take part in an event, supplying us with products or services, volunteering, making a donation, employment purposes or visiting our website.

Depending on how we interact with you, we may collect personal data from you in various ways such as:

- Through face-to-face interactions, through this website, by e-mail, over the phone or using any paper forms you might complete.
- From another organisation such as Just Giving, Google Analytics or Vacancy Filler
- Directly from you when you contact us when enquiring about our service or when making a donation.

Credit and Debit card information.

If you use our website to donate to us, Just Giving – our third party card processor will process your card details and Hollybank does not receive any of these card details. We will receive a notification of payment to us with the details that you disclosed at the time of payment. By using this service you are agreeing to Just Giving's Privacy Notice which can be found [here](#).

If you use PayPal to donate to us, PayPal are processing your card details and Hollybank do not receive any of these details. We receive a notification with your name and your address and contact details if you disclose them. This is used to administrate any donations received. By using this service, you are agreeing to PayPal's Privacy Notice which can be found [here](#).

If you provide us with your card details in person at our on-site canteen, within ELMS, Bradbury, Fundraising or over the phone, all identifiable credit and debit card details and validation codes are destroyed securely once a payment or donation has been processed. Only staff who are authorised to process payments will handle your personal data.

However you choose to make a donation, your payment and personal data is then stored onto our donor management system to create a profile, which helps us to administer your payment.

Direct Marketing

Hollybank would like to contact it's supporters from time to time with news and updates on what is happening at Hollybank. You can update your preferences at any time by contacting the Fundraising team on 01924 490833

Why do we use this data?

We may use your personal data to help us to provide a service to you, help us raise funds or achieve our charitable aims. How we use your data will depend on our relationship with you and how you interact with our services.

Our Legal Basis for using this data

We appreciate you have provided us your personal information and will respect the trust that this represents. These are the most common reasons why we can legally use your data:

- Contract – your personal information is processed in order to fulfil a contractual or potential contractual arrangement.
- Consent – where you agree to us using your information e.g. to receive certain information from us
- Legitimate interest – where we use your data in a way that we believe you would expect us to because of our relationship e.g. to monitor and improve our services. In each case where we use your data based on our legitimate interests, we carefully balance your rights and expectations to ensure that processing is fair to you

- Legal obligation – where there is a statutory or other legal requirement to process and share the information e.g. gift aid returns.

An example of how we may legitimately process your personal data is to contact you about a fundraising event which you have previously participated in, or to send parents and families a newsletter about what we have been doing across Hollybank.

How do we store your data

Your data is stored internally both on paper and electronically. We may use an electronic database to store information such as for supporters or suppliers. We take appropriate technical and organisational steps to ensure the security of all personal data, including policies around the use of technology, devices and access to systems.

Your data is not transferred outside of the EU.

Who has access to your information

Only people and departments who require access to the data for the performance of their roles will be able to see your data.

Third party providers

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We share your information with third parties in the following ways:

- In accordance with our legal obligations, we may share information with local authorities for example if we have safeguarding concerns.
- On occasion, we may need to share information with the police
- We may also need to share information with our legal advisors for the purpose of obtaining legal advice
- Occasionally we may use consultants, experts or other advisors to assist Hollybank in fulfilling its obligations. We might need to share your information with them if this is relevant to their work.
- Organisations who we work with for fundraising events
- Security organisations
- Website hosting company
- Health and social welfare organisations
- Suppliers and service providers – to enable them to provide the service we have contracted them for.
- We may share some information with our insurance providers if there is a serious incident

- Our regulators (OFSTED and CQC), Health and Safety Executive or other relevant professional bodies
- Financial organisations
- We may need to share information if there is an emergency.

How long do we keep your information?

We only keep your information for as long as we need to. Our Retention and Destruction of Records Policy sets out how we securely destroy your data once it is no longer required, as well as how long we keep your information for.

How can you access and update your information

It is up to you how you want to hear from us and you can let us know at any time if you would like to change the way we send you information or update your information.

How you do this, will depend on our relationship with you. Please contact our main reception on 01924 490833 or e-mail info@hollybanktrust.com.

Your choices

You have a number of rights when it comes to the personal data that we have. You can:

- Access and obtain a copy of your data on request
- Require us to change incorrect or incomplete data
- Require us to delete or stop processing your data (conditions apply to this)
- Object to the processing of your data which we rely on legitimate interests as the legal ground for processing.

If you would like to exercise of any of these rights, please contact us

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner's Office (www.ico.org.uk)

Review of this Privacy Notice

We keep this privacy notice under regular review. This notice was last updated in October 2018