

# 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).

Unlocking Potential Privacy Policy may change so please remember to check back from time to time. This was last updated in April 2018. When we make any changes to this Privacy Policy, we will make this clear on our website or contact you.

## Who we are

Here at Unlocking Potential, 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 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 our Data Protection Officer at:

- CAN Mezzanine, 7-14 Great Dover Street, London, SE1 4YR
- 07387108743
- [dpo@up.org.uk](mailto:dpo@up.org.uk)

## How we collect information about you

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 one of our services, make a donation to us, ask a question about our work, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes 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. There are more details below – see ‘Cookies’.

We use this information to personalise the way our website is presented when you visit to make improvements 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.

## **Information we collect and why we use it**

### **Personal Information**

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making a donation), as well as information you provide in any communications between us. You will have given us this information whilst making a donation, signing up for one of our services, or any of the other ways to interact with us.

We will mainly use this information:

- To process your donations, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- 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 goods and services you have requested.

## **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 fulfil a contract with you (for example, because you have signed up for one of our programmes).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Unlocking potential to process your information to help us to achieve our vision of working within London communities to transform the life chances of marginalized children and young people.

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, use your anonymous 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.

## **Sharing your Information**

The personal information we collect about you will be used by our staff at Unlocking Potential so that they can support you.

We will only share your information if you give us consent to do so. 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.

## **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.

## **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.

## 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.

## Your rights

- You have various 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 our Data Protection Officer at Unlocking Potential; CAN Mezzanine, 7-14 Great Dover Street, London, SE1 4YR by email at [dpo@up.org.uk](mailto:dpo@up.org.uk) and by phone on 07387108743.

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 photographic evidence (UK drivers licence, passport, birth certificate with photo) 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. 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 therapy), 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.

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

## Cookies

“Cookie” is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

### How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and allows us to improve the user experience.

### The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their [UK Cookie Guide](#).

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.
- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. As such if you visit the Mind website you may then be more likely to see adverts about Mind's work on other websites as your browsing suggests that this is an area of interest.

If you have any questions about how we use cookies, please [contact us](#).

## Monitoring

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

To find out more about this policy and how we look after your personal information, contact our main office at [dpo@up.org.uk](mailto:dpo@up.org.uk) or on 07387108743.