

## Regenerate Privacy Policy

Your personal data helps us to deliver exceptional services to young people and their communities in and around Roehampton . Regenerate is committed to protecting your personal information, whether you benefit from our services directly, support us financially or engage in one of our community events. Our aim is to put you and the safeguarding of your personal data at the centre of everything we do, and to manage your personal data respectfully and responsibly.

### What This Policy Covers

This Policy explains how Regenerate collects, manages and uses the personal information you provide to us, whether via the internet, by phone, in person, by email, in writing or in any other way. We ensure that we use your personal data in accordance with all applicable laws concerning data protection and personal information. In this document, 'personal data', 'personal information' and 'data' mean any and all data that relates to a person who can be directly or indirectly identified from that data. Where it might apply, this definition will incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulations.

This Policy explains:

- Who we are;
- What personal data we collect;
- How we may use your data;
- How we may contact you;
- How we will store and protect your data;
- The circumstances in which we share your data with third parties;
- What you should do if you would like us to change or delete the data we hold for you or stop contacting you;
- How to make a complaint;
- Changes to this Privacy Policy.

**Please read this Privacy Policy carefully. If you do not agree with this Privacy Policy, you should stop using our website and other services immediately.**

### Who We Are

### What Personal Data Do We Collect

We may collect personal information about you when you engage with us for a number of reasons including when you use our services, attend an event or become a financial supporter, enquire about our activities and services, engage with our social media, , make a donation, sign up to receive emails, register interest in one of our community, corporate or industry events, or otherwise provide us with personal information that may be used by Regenerate to deliver its charitable services, enable us to provide a service to you or to enhance your experience with us.

This can include information such as your name, postal address, email address, phone number, age, bank details, credit/debit card details, any access requirements you tell us, and if you are interacting with us as a business, government authority or charity, your organisation or entity's name. Where you have made a donation to us, we will also ask you if you are a tax payer and would like us to claim gift-aid on your donation, and record this information so that we can claim the gift-aid.

We do not pass on any information to third parties. If there are special circumstances when there is a clear reason to do so for your benefit, we will ask permission.

We do not usually collect 'sensitive personal data' from you unless there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or support, to enable you to enjoy the services we offer. Examples of sensitive personal data we may hold could include health information that comes as a result of knowing your access or other requirements when engaging with our events, activities and programmes,.

### **Website Users**

We may also gather information about you from your use of our website, such as which pages are most visited and which productions, events or facilities are of most interest. We will use this information to improve our website and to ensure we provide the best services for our users. We only use aggregated or anonymous information which does not identify individual visitors to our website. By submitting your details, you enable us (and where applicable any suppliers we use) to provide you with the services, information, activities or online content you select.

The Regenerate website uses cookies to help our website work well and to track information about how people are using it. Through the use of cookies, we will receive information from your computer such as your IP address (the unique number that identifies your computer when you use the internet), a list of URLs like the referring site, and the site you exit to. We may record this information to provide you with a good experience when browsing our website or to improve the functionality of our site.

### **Job Applicants**

If you apply to work at Regenerate, we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside Regenerate, for example, if we need a reference, we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we may hold your personal information for up to 12 months after we've finished recruiting for the post you applied for. After this date we will destroy or delete your information. We may keep de-personalised statistical information about applicants to develop our recruitment processes, however no individual applicant would be identifiable from this information.

If you commence employment with Regenerate, your data will be processed in accordance with your employment contract and our other applicable policies.

### **Under 16's**

We are committed to protecting the privacy of the young people who engage with us through our website, our events and our projects and programmes. When we collect data about a person aged under 13, we will make it very clear as to the reasons for collecting this data and how it will be used and ensure we have consent from a parent or guardian.

### **Your Debit Card And Credit Card Information**

If you use your credit or debit card to donate to us online or over the phone, we will ensure that this is done securely and that we will not keep your details for longer than necessary for the purposes of the transaction.

### **How We May Use Your Data**

We may use your personal data for a number of purposes, including the following:

- To provide you with services or information you have requested from us;
- To contact you about any cancellations, amendments or additional information in respect of the above;
- To provide you with information by email which we feel may interest you and where you have given your consent to be contacted by email. This may include requests for your support (please refer to How We May Contact You);
- To provide you with information about our work or our activities by post where we have a legitimate interest in sending it to you. Again this may include requests for your support;
- To telephone you if you have provided us with your telephone number and it is in connection with a service we are delivering to you;
- To process a donation we may receive from you and to communicate with you in regard to the donation (this could include asking you whether you would like to sign a gift-aid declaration to allow us to claim gift-aid on your donation);
- For internal record keeping, including the management of any feedback or complaints;
- To target communications and messages to you
- To track user visits to our website and record navigation across our website and in addition to track whether our emails are opened and read;
- To invite you to participate in surveys or research. From time to time we conduct surveys and promotions and may request information from you as part of these. Participation in these is entirely voluntary and you therefore have a choice whether or not to disclose any information which might be required;
- To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic, to personalise and improve the way our information is presented to you and to provide and manage access to our website;
- Where it is authorised by law;
- We may assess your personal information for the purposes of credit risk reduction or fraud prevention;

### **Inappropriate Website Content**

If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws, such as defamatory content, we may use your personal information to inform relevant third parties such as your internet provider or law enforcement agencies.

### **How We May Contact You**

#### **By Email**

If possible, we would like to be able to contact you by email because we feel it is the most efficient and productive way to communicate with you about services and fundraising at Regenerate.

We will contact you by email if you have given us your email address and we are emailing you to provide the services you have requested.

We may also contact you by email if you have been a beneficiary and we want to contact you about similar goods or services.

We may in addition contact you for a variety of different fundraising initiatives such as requesting donations, inviting you to attend special events

### **By Text**

We may send you communications via text rather than email if you have been a beneficiary and we want to contact you about similar goods or services.

We may also contact you if there are last minute changes or cancellation of events.

### **By Post And Telephone – where we have a legitimate interest to contact you**

If you have provided us with your postal address we may send you personalised mail about our work and our fundraising campaigns. We will carry out a legitimate interest assessment to ensure that we are satisfied that you would reasonably expect such communications from us and would not consider it to be intrusive. For example, we may want to post you an invitation to an event we think you may be interested in.

We do not cold call, nor do we pass details on to any third party

We are a registered charity with no regular public subsidy and we rely on donations, grants and sponsorship from individuals, trusts and foundations and businesses to maintain our operation. Based on the frequency of your visits and purchasing patterns, we may promote our memberships to you or ask you for additional support for our work.

If you have not given us your data yourself and we have not received it from a third party, we will only contact you if you fall into one or more of the categories below:

- You are a known philanthropist or connected with a trust or foundation, and/or
- You are a known supporter of work with young people or in SW London communities and/or
- You are a publicly recognisable figure.

### **If We Have A Legal Obligation To Process Your Data**

In addition to the above, we may have a legal obligation to process your data, for example in order to carry out due diligence if you are a prospective donor or sponsor.

### **Business To Business Communications**

If we are communicating to you on a 'business to business' basis we will contact you by post or email or phone, unless you have let us know that you would prefer us not to do so.

### **How We Will Store And Protect Your Data**

We will either store your data on our own servers or on third party servers in the Cloud. Accordingly, we may on occasion need to use the services of suppliers outside the European Economic Area for this purpose, however we will take all reasonable steps to ensure that your information is held in compliance with the General Data Protection Regulations. This also applies for any third party we use in our operations who are located outside of the European Economic Area.

Personal data acquired for the purpose of completing sales transactions relating to productions, events, services and products, and sign-up to our email lists will be stored securely on our CRM systems.

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure the data we collect.

### **Keeping Your Personal Data**

We do not keep your personal data for any longer than is necessary than the reason(s) for which it was collected requires. If we have your permission, your personal data will be retained on the following bases, and if we do not need to keep your personal data for archival, legal or business reasons, we will delete or suppress your personal information:

- your personal data will be securely stored on this system for no longer than five years after you actively engaged with our services or were in email communication with us;
- the personal data of those who make a financial donation through one-off donations, memberships or any other fundraising initiatives will be securely stored on this system for no longer than 10 (ten) years since they were last active with us;

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

If you have told us that you do not want to hear from us at all or by a particular channel, we will hold the minimum amount of your personal data on a suppression list to ensure we comply with your request.

### **Sharing Your Data With Third Parties**

If you have chosen to take part in an activity Regenerate is running jointly with a third party organisation, you will be asked if your data can be shared with these third parties.

We may from time to time share statistical not personal data from our website with third parties such as Wandsworth Council or funders.

We may disclose your personal information to a third party if we are under a duty to disclose your personal data 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 Regenerate, for example in cases of suspected fraud or defamation.

Where any of your personal data is shared, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law. Such personal data will be anonymised, will not include any personally identifying data or any anonymised data that can be combined with other data and used to identify you, and will only be shared and used in accordance with this Policy and the law. Any data that is shared will not be shared further.

### **What Should You Do If You Would Like Us To Change Or Delete The Data We Hold For You, Or Stop Contacting You?**

As well as the right to be informed about how we collection and use your personal data, and rights in respect of automated decision making and profiling, you also have the following rights:

#### **Do You Want Us To Stop Contacting You?**

It is your choice as to whether and how you want to receive information about us and our work, and the ways you can get involved. You have the right at any time to ask us to amend, delete or stop using your personal information, including for marketing purposes.

You may opt out of marketing emails at any time by clicking the 'unsubscribe' link in our marketing emails and when registering for an online account with us. You can also change any of your marketing preferences at any time (including telling us that you don't want us to contact you for marketing purposes by telephone or send you direct marketing by post) through your online account with us, by contacting [info@regenerateuk.co.uk](mailto:info@regenerateuk.co.uk). We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help to ensure that we do not continue to contact you.

#### **Do You Want To Change The Details We Hold For You?**

The accuracy of your information is important to us. You may change your personal information either by emailing [info@regenerateuk.co.uk](mailto:info@regenerateuk.co.uk) or by phone, or in person.

#### **Do You Want To Request A Copy Of The Information We Hold For You?**

You have a right to request a copy of the personal information we hold about you, to have any inaccuracies corrected, or have your data erased. You also have a right to data portability (where the personal data we hold for you can be shared with another service or organisation).

If you would like to make a request for this data (a 'Subject Access Request') we require you to prove your identity with two pieces of approved identification for these purposes. Please address requests to [info@regenerateuk.co.uk](mailto:info@regenerateuk.co.uk) and we will aim respond to you within 10 working days. Please provide as much information as possible about the nature of your contact with us to help us locate your records.

## **How To Make A Complaint**

If you would like to make a complaint about any aspect of this Policy, please contact [info@regenerateuk.co.uk](mailto:info@regenerateuk.co.uk)

## **The Information Commissioner's Office**

You have the right to lodge a complaint with the supervisory authority responsible for all information matters, The Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

## **Changes To This Privacy Policy**

We may change this Policy from time to time (for example if the law changes), so please do check it regularly to keep up-to-date. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our website. By continuing to engage with us through our services and our website you will be deemed to have accepted such changes.

Regenerate, May 2018