

ReachOut – Privacy Notice

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ReachOut (UK registered charity number 1096492 / UK registered company number 4604379) ("**we**", "**us**") is committed to protecting your privacy. At all times we aim to respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Notice ("**Notice**") sets out our data processing practices and your rights and options regarding the ways in which your personal information is collected and used.

This Notice contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal information.

The provision of your personal information to us is voluntary. However, without providing us with your personal information, your use of our services or your interaction with us may be impaired. For example, you will be unable to make a donation.

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1. We collect personal information about you:

(a) When you give it to us **directly**

For example, personal information that you submit to us through our website by making a donation, signing up for our email newsletter or completing an application to volunteer with us; or personal information that you give to us when you communicate with us by email, phone or letter.

(b) When we obtain it **indirectly**

For example, your personal information may be shared with us by third parties such as schools, external fundraisers, reference providers or a search engine. To the extent we have not done so already, we will notify you when we receive personal information about you from them and tell you how and why we intend to use that personal information.

(c) When it is **available publicly**

Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social

media services, we may access information from those accounts or services (such as Twitter, Facebook and Instagram).

(d) When you visit our **website**

When you visit our website, we automatically collect the following types of personal information:

- (i) technical information, including the internet protocol (IP) address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
- (ii) Information about your visit to our website, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

We also collect and use your personal information by using cookies on our website – please see our Cookie Notice which can be found on our website: <https://www.reachoutuk.org/policies>.

In general, we may combine your personal information from these different sources for the purposes set out in this Notice.

2. What personal information do we use?

We may collect, store and otherwise use the following kinds of personal information:

- (a) your name (and, where appropriate, previous names) and contact details, including postal address, home and mobile telephone numbers and email address;
- (b) your date of birth, gender, ethnicity and nationality;
- (c) your national insurance number;
- (d) information contained in identification documents such as passports or utility bills;
- (e) information about you which we discover through background checks;
- (f) details of your qualifications, experiences and/or interests;

- (g) your financial information, such as bank details and/or credit/debit card details;
- (h) information about our services which you use/which we consider may be of interests to you; and/or
- (i) school information, including schools attended, grades, additional needs;
- (j) chat text from your groups online mentoring sessions;
- (k) any other personal information which we receive as per section 1.

Do we process special categories of personal information?

The EU General Data Protection Regulation (“**GDPR**”) recognises certain categories of personal information as sensitive and therefore requiring more protection, for example information about your health, ethnicity and political opinions.

In certain situations, ReachOut may collect and/or use these special categories of personal information (for example, to ensure that reasonable adjustments are made to allow you to volunteer with us).

3. How and why will we use your personal information?

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

- (a) to provide you with services or information you have requested;
- (b) to provide services to our beneficiaries;
- (c) to provide further information about our work, services, activities or events (where necessary, only where you have provided your consent to receive such information);
- (d) to process your donations;
- (e) to answer your questions/requests and communicate with you in general;
- (f) to further our charitable aims in general, including for fundraising activities;
- (g) to analyse and improve our work, services, activities and events (including our website), or for our internal records;

- (h) to report on the impact and effectiveness of our work;
- (i) to run/administer our website, keep it safe and secure and ensure that content is presented in the most effective manner for you and for your device;
- (j) to monitor volunteering trends and recipients of our services in line with our equal opportunities policy; <https://www.reachoutuk.org/policies>
- (k) to process your application for employment/a volunteer roles;
- (l) to register and administer your participation in events;
- (m) to confirm your identity;
- (n) to satisfy legal obligations which are binding on us, for example for volunteers who will work with children on our behalf under the Police Act 1997;
- (o) to know which service to put you on;
- (p) to match beneficiaries with volunteers;
- (q) to audit/administer our accounts;
- (r) for the prevention of fraud or misuse of services; and/or
- (s) for the establishment, defence and/or enforcement of legal claims.

4. Lawful bases

The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant.

- (a) Where you have provided your **consent** for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you email newsletters, and we may ask for your explicit consent to collect special categories of your personal information).
- (b) Where **necessary for the performance of a contract** to which you are a party or to take steps at your request prior to entering a contract (for example, if you apply to work for or volunteer with us).
- (c) Where necessary so that we can **comply with a legal obligation** to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
- (d) Where it is in your or someone else's **vital interests** (for example, in case of medical emergency).

(e) Where there is a **legitimate interest** in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

In broad terms, our "legitimate interests" means the running of ReachOut as a mentoring charity which works with young people in disadvantaged communities; for example processing donations, administering events and taking applications for volunteers.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

5. Supporter research

We may also analyse your personal information to create a record of your interests and preferences. This allows us to ensure that communications are relevant and timely, to contact you in the most appropriate and relevant way and in general to provide you with an improved user experience. It also helps to understand the background of our supporters so that we can make appropriate requests to those who may be willing and able to give more than they already do, enabling us to raise funds and help beneficiaries sooner and more cost-effectively.

If you would prefer us not to use your personal information for supporters' research please let us know by using the contact details in section 16 below.

6. Communications for marketing/fundraising

We may use your contact details to provide you with information about our work, events, services and/or products which we consider may be of interest to you (for example, about services you previously used, or updates about fundraising appeals and/or volunteering opportunities via our newsletter).

Where we do this via email, SMS or telephone, we will not do so without your prior consent (unless allowed to do so via applicable law).

Where you have provided us with your consent previously but do not wish to be contacted by us about our projects and/or services in the future, please let us know by email at info@reachoutuk.org. You can opt out of receiving emails from us at any time by clicking the "unsubscribe" link at the bottom of our emails.

7. Donations

When you use our secure online donation function you will be directed to a specialist payment services provider who will receive your financial information to process the transaction. We will provide your personal information to the payment services provider only to the extent necessary for the purpose of processing your donation.

8. Young people's personal information

When we process young people's personal information, where required we will not do so without their consent or, where required, the consent of a parent/guardian. We will always have in place appropriate safeguards to ensure that young people's personal information is handled with due care.

9. How long do we keep your personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure (please see Section 13 below), we will remove it from our records at the relevant time.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

10. Will we share your personal information?

We do not share, sell or rent your personal information to third parties for marketing purposes. However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Notice.

Non-exhaustively, those parties may include:

- (a) healthcare professionals and organisations involved in the provision of care, facilities and/or supplies;
- (b) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts or cloud storage providers;

- (c) third party payment service providers that collect or process donations on our behalf;
- (d) professional service providers such as accountants and lawyers;
- (e) insurers;
- (f) parties assisting us with research to monitor the impact/effectiveness of our services;
- (g) external fundraising entities/platforms; and/or
- (h) regulatory authorities, such as tax authorities
- (i) partner schools
- (j) partner universities

In particular, we reserve the right to disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;
- if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- if we are under any legal or regulatory obligation to do so; and/or
- to protect the rights, property or safety of ReachOut, its personnel; users; visitors or others.

11. Security/storage of and access to your personal information

ReachOut is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information.

Your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers with features enacted to prevent unauthorised access.

12. International transfers of your personal information

Given that we are a UK-based organisation, we will normally only transfer your personal information within the UK or European Economic Area (“**EEA**”), where all countries have the same level of data protection law as under the GDPR.

However, because we may use some third parties to process personal information on our behalf, it is possible that your personal information may be transferred to and stored in a location outside the UK or EEA.

Please note that some countries outside the UK or EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/or otherwise processed outside the UK or EEA in a country that does not offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses approved by the European Commission) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Notice. If you have any questions about the transfer of your personal information, please contact us by using the details in section 16 below.

13. Exercising your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or fundraising purposes or to unsubscribe from our email list at any time. You also have the following rights:

- (a) **Right of access** – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
- (b) **Right of erasure** – at your request we will delete your personal information from our records as far as we are required to do so.
- (c) **Right of rectification** – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
- (d) **Right to restrict processing** – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.

- (e) **Right to object** – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests basis (see section 4 above), (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes. If you object to direct marketing, we will retain certain limited personal information about you to ensure that we do not contain you again.

- (f) **Right to data portability** – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another organisation – in a machine-readable format.

- (g) **Rights related to automated decision-making** – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal effects or similarly significant affects you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or UK law (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you contact us using the details in section 16 below.

We encourage you to raise any concerns or complaints you have about our data processing by contacting us using the details provided in paragraph 16 below. You are further entitled to make a complaint to the Information Commissioner's Office – www.ico.org.uk. For further information on how to exercise this right, please contact us using the details in section 16 below.

14. Changes to this Notice

We may update this Notice from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an update notice on our website. This Notice was last updated on 23 May 2018.

15. Links and third parties

We link our website directly to other sites. This Notice does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

a. **ReachOut Online Mentoring**

Where necessary ReachOut will hold some sessions/full projects via online mentoring solutions, especially during the covid-19 crisis due to lockdown restrictions. This currently involves using third party video calling platforms.

The types of personal data ReachOut would collect to be able to offer ReachOut Online include (in addition to any personal data ReachOut holds as part of its normal business activities as detailed in this privacy policy):

- Young person's email address

ReachOut is undertaking steps to minimise the amount of personal data to be processed for ReachOut Online sessions and anonymise the personal data where possible. Storage and processing of personal data is in accordance with ReachOut's privacy policy.

ReachOut have taken the below steps to ensure your data is secure whilst using the relevant third party video calling platform:

- Not collecting more personal data than necessary for our legitimate purposes in providing ReachOut Online
- Prohibiting the live recording of sessions
 - Nb. Session chat will be recorded for safeguarding reasons, but this data will not be stored with the third party provider. We will put further technical measures in place such as password protection, encryption, anonymisation, and/or limiting access to protect any personal data in storing session chats
- Encouraging mentors and mentees to sign in as guests so no details associated with individual accounts can be accessed by other users
- Using different meeting IDs and passwords for every ReachOut Online session (and instructing participants not to share these with any third party)
- Adopting a code of conduct for all participants of ReachOut Online to abide by to help minimise risk
- Utilising standardised virtual backgrounds

- Adding further ReachOut Online session controls on file transfer, access functions, limiting control options for participants

ReachOut Online is currently carried out using **Zoom**. Further details of Zoom's Privacy Policy can be seen [here](#).

ReachOut acknowledges that using a third party video calling platform such as Zoom comes with certain security and privacy risks (such as lack of end-to-end encryption to keep data from being invisible to Zoom, risk of sessions being hacked by third parties if the session access details are leaked, and other changing security risks). ReachOut has taken reasonable steps to minimise risk but we need to note that the cooperation of ReachOut Online participants is vital in minimising the overall risk. We ask that the participants of ReachOut Online abide by the code of conduct and recommendations provided to them to assist in our effort to minimise risk and maintain a safe environment. ReachOut is frequently reviewing the position and adding in safeguards and practical steps to minimise risk where possible.

16. How to contact us

Please let us know if you have any questions or concerns about this Notice or about the way in which ReachOut processes your personal information by contacting us via the following channels:

Email: info@reachoutuk.org

Telephone: 020 3489 8787

Post: Unit A, Ground Floor, 26-28 Ramsgate Street, Hackney, London E8 2NA