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## NORTHERN ROOTS PRIVACY STATEMENT

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Please read this policy carefully to understand how we collect, use and store your personal data.

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### INTRODUCTION

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Northern Roots is a charity registered in England and Wales and a company limited by guarantee.

Registered charity Number: 1136843

Registered office: Northern Roots, Alexandra Park, Kings Road, Oldham, OL8 2BH.

At Northern Roots we take your privacy seriously and are committed to protecting your personal information. We are legally obliged to use your information in line with all laws concerning the protection of personnel information including the Data Protection Act 2018 and the General Data Protection Regulations.

This privacy policy explains how we, Northern Roots, may collect and use the information you give us.

If you have any questions regarding our privacy policy, please write to:

Information Governance Lead  
Northern Roots  
Alexandra Park,  
Kings Road,  
Oldham,  
OL8 2BH

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### HOW WE STORE AND USE YOUR PERSONAL DATA

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Northern Roots is committed to protecting the privacy and security of your personal data. This document outlines how we collect and use information about you.

The law states that any personal information that we hold about you must be:

- Used lawfully, fairly, and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you, and not used in any way that is incompatible with those purposes;
- Relevant to the purposes that we have told you about, and limited to those purposes only;
- Accurate and up to date;
- Kept only for as long as necessary for the purposes that we have told you about.

- Kept securely.

Northern Roots is a “data controller” This means that we are responsible for deciding how we hold and use personal information about you. We do not share your information without consent unless the law allows us to do so. Your information will not be transferred or stored outside the UK.

This document applies to current and former service users - as we may be required to retain data for specified periods after people have stopped using our services.

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## HOW WE COLLECT INFORMATION

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We collect information about you whenever you interact with us. The type and quantity of information we collect and how we use it depends on the way you are providing it. Examples of data collection maybe when you:

- Sign up for an event
- Are referred to us via a third party
- Post content to our website/social media sites (including Facebook)
- Volunteer for us
- Attend a meeting with us and provide us with information about yourself
- Contact us through the following: online, email, phone, SMS, social media or post

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## WHEN YOU ARE USING OUR WEBSITE

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Upon visiting our website, information about your visit is recorded and stored. These are stored in the form of cookies. Cookies are small text files that are placed on our computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Northern Roots website uses cookies to monitor browsing preferences. If you do allow cookies to be used, we collect and store only the following information about you: the name of the domain from which you access the Internet, the date and time you access our site, and the Internet address of the website from which you linked to our site. We use the information we collect to measure the number of visitors to the different sections of our site, and help us make our site more useful to visitors.

When you visit our website we may use a third party service such as Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the numbers of visitors to the various part of the site, to monitor and report on the effectiveness of the site and help us improve it. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

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## WHAT CATEGORIES OF PERSONAL INFORMATION WE COLLECT

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When interacting with Northern Roots we may collect where relevant:

- Your full name
- Your contact details (full address, email address and phone number/s)
- Your date of birth – if required for specific purposes
- Your bank or credit/debit card details (only if you are paying for an event)
- Where appropriate we may also ask for information relating to health if you are undertaking an event where this is deemed necessary in the risk assessment.

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## USE OF YOUR PERSONAL INFORMATION

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We will use your personal information in a number of ways, mainly including the following:

- To provide you with the services/products or any information you have requested
- To update you about any changes to our services
- To administer your donation/payment, including Gift Aid processing
- To maintain our organisation records and ensure we have your most up-to-date marketing preferences
- To help us improve our services, campaigns or information-offering
- To analyse and improve the operation of our website
- To invite you to participate in surveys or research
- To contact you where you have been identified as a contact person for an organisation, such as a school (if we obtain your contact details in this way, we will only use them to contact you in the ways in which you have agreed to be contacted)
- To communicate volunteering opportunities
- As required by law

We may also use your personal information so that we can understand our service users better, to assist with targeting relevant communications to match profiles of supporters and to target our resources effectively. We may analyse geographic and demographic characteristics, and frequency of your visiting history to better understand your interests and preferences in order to contact you with the most relevant communications as well as taking into consideration your preferred marketing options

If you wish to stop us sending information or direct marketing materials, or change your preferred contact preferences - please contact our Information Governance Lead in writing at Northern Roots, Alexandra Park, Kings Road, Oldham, OL8 2BH. Alternatively please email us at [info@northern-roots.uk](mailto:info@northern-roots.uk) so that we can update your information.

If you would like to update us on how you receive information from us, please contact us by the same method above to let us know your preferences in respect of mail, email, phone, or text methods.

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## CHILDREN'S DATA

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A number of programmes and activities run by Northern Roots will involve the collection of children's data. If the child is under 13 then we have to ask a parent or carer, or another adult who looks after them to give us any personal identifiable information. They can ask to see any of that information, any time. If a child is 13-18 then they can give us permission (or, 'consent') to record some data about them depending on what we are doing and hold on to it for as long as we need to. Where appropriate, we will always ask for consent from a parent or guardian to collect information about children. All Northern Roots events will have clear rules on whether or not children can take part and the collection of data will be managed in accordance with each individual event, with appropriate safeguards in place and consent obtained from whoever holds parental responsibility for the child.

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## HOW DO WE KEEP YOUR DATA SAFE AND WHO HAS ACCESS TO IT?

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We place great importance on the security of your personal information and will always try to take appropriate precautions to protect it.

Our website has a SSL certification.

Data is held in an encrypted state in a secure data centre in the UK under a contract with an external IT provider.

We always ensure only authorised personnel have access to your information i.e. Northern Roots' staff, or contractors and that they are appropriately trained to manage your data. We may also use external agencies for the purpose of mailing data and these only act on specific instructions we provide.

Despite all of our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information you disclose to us online, and you must understand that you do so at your own risk.

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## **WHO WE SHARE YOUR PERSONAL DATA WITH**

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If Northern Roots use external organisations that collect and/or process personal data on our behalf, before working with these companies we perform rigorous checks to ensure they meet all relevant regulations and legislation. We will always implement a contract with our suppliers, which impose robust data protection requirements, including the provisions of this policy, and seek to provide maximum protection to your personal details.

We may be legally be required to disclose your details if required to by the police or for regulatory reasons. We will only ever share your data in other circumstances if we have your consent to do so.

We do not sell or share personal information to any other third parties for the purposes of marketing. But if we run an event in partnership with another organisation, your personal information may need to be shared for administration of the event, but we will always ask for your consent and be clear on what these details will be.

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## **HOW WE KEEP YOUR INFORMATION UP-TO-DATE**

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We will update information based on the details you provide to us. We would really appreciate it if you let us know if any of your contact details change so that we can update our records for you accordingly. You can update your personal information at any time, please contact our Information Governance Lead in writing at Northern Roots, Alexandra Park, Kings Road, Oldham, OL8 2BH. Alternatively please email us at [info@northern-roots.uk](mailto:info@northern-roots.uk) so that we can update your information.

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## **HOW LONG WE KEEP YOUR INFORMATION FOR**

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We will hold your personal information on our systems for as long as is necessary for the relevant activity, for legal requirements and we will also hold some information to help understand your past relationship with us.

If you ask us to stop sending you marketing materials, 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. If you register with the Fundraising Preference Service we will also keep your information on record to fulfil this criteria.

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## **OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION**

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Although in many cases we will seek consent to process your personal data, in some instances we may process your information without consent when we are legally allowed to do so. This will only be where it is in our legitimate interests to do so and where we are confident that such processing is not likely to prejudice your legitimate interests or rights and freedoms. We will carry out a Legitimate Interests Assessment (LIA) for the purpose on each occasion.

Where we are processing your personal data on the basis of consent that you have given us, you are entitled to withdraw that consent at any time such that we can no longer rely on it as a basis for continuing to process your personal information.

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## YOUR RIGHTS

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- You retain control of how we use your data and you have the right to ask us to stop holding and processing your personal information, which we will do. In some circumstances we may legally be required to retain your personal information for legal/audit purposes. However, this will be discussed with you depending on your requirements. Please call or write to the Information Governance Lead, Northern Roots, Alexandra Park, Kings Road, Oldham, OL8 2BH. Alternatively please email us at [info@northern-roots.uk](mailto:info@northern-roots.uk)
- You have the right to withdraw consent to direct marketing. You can exercise this right at any time and can ask us to update your preferences. See above for relevant contact details.

You also have the right to access your personal data and the right to obtain a copy, this is usually referred to as a Subject Access Request. This request can be verbally or in writing. This gives entitlement for you to obtain the following from us:

- Confirmation that we are processing your personal data;
- A copy of your personal data; and
- Other details such as the purpose of processing your data, the categories of data concerned, who we disclose this data to, the retention period for storing your data or the criteria for determining how long we will store it.
- In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified.
- Where we have no lawful basis for holding onto your personal data you are entitled to require us to delete it.
- In limited circumstances you may be entitled to have the personal data you have provided to us sent electronically to you for you to provide to another organisation.

If you have any concerns or complaints about how we are handling your data please do not hesitate to get in touch as noted under the Complaints Policy section below. You can also contact the Information Commissioner's Office

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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### **COMPLAINTS POLICY AND PROCEDURE**

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If you would like to raise a concern or make a complaint about how we process your personal data, or about any of the services provided by Northern Roots, we encourage you to speak to manager of the department concerned first, they will respond to you. If they have not been able to satisfy your complaint please contact our Chief Executive.

To contact the Chief Executive call, write or email to Northern Roots, Alexandra Park, Kings Road, Oldham, OL8 2BH. Alternatively please email us at [info@northern-roots.uk](mailto:info@northern-roots.uk) and we will acknowledge receipt of the complaint within our agreed timescales on our complaints policy.

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### **CHANGES TO THIS PRIVACY STATEMENT**

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This statement may change from time to time. If we make any significant changes to this policy, we will publicise these changes clearly on our website.

Please feel free to revisit this policy each time you consider giving your personal information to Northern Roots.

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### **OTHER WEBSITES**

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This Privacy Statement only relates to information that we obtain from you. If you visit a website operated by a third party through a link included on our website your information may be used differently by the operator of the linked website. You are advised to read their Privacy Statement.