

Current version: December 2024

Review due: December 2025

# **Privacy Notice to Individuals**

#### Personal Data we collect

We only collect personal data that is deemed essential for the care and well-being of our services users and facilitates smooth communication between our colleagues, staff, trustees and volunteers. Any information we hold for anyone else who receives other services, such as training, events, donors, sign up for social media, communication through the website, e-newsletter sign up and any consultations of stakeholders we may engage in is hold on a strictly need to know basis.

For example, we might hold:

- Your full name and date of birth
- Your postal address, email address and phone number
- Your current living situation
- Your current interests and activities insofar as they are relevant to your engagement with Intercom Trust

We will also collect and hold information about:

- meetings with staff, key issues and actions when providing services to you
- contact preferences
- donor and Gift Aid status
- details of correspondence sent to you, or received from you
- any other information provided by yourself at the request of Intercom Trust



## Sensitive Personal Information (Special Category Data)

Sensitive Personal Information can include information about a person's health, race, ethnicity, political opinions, sexual activity for sexual health purposes, sexual orientation, gender identity, or religious beliefs. Sometimes we collect this data because you are access a specific service where it is vital to the provision of that service (for example, in some sexual health matters), sometimes as part of our equalities and diversity monitoring (to ensure we are reaching individuals from all communities).

All information about you is treated with care and anything sensitive, we extra care and confidentiality and always in accordance with this Privacy Policy.

We will not pass on your details to anyone else without your permission except in exceptional circumstances such as anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation. See our Confidentiality and Information Sharing Policy for more information.

## What we will do with your Data

When we ask you to provide your personal information, we will let you know why we are asking, and how we will use your data, by directing you towards this notice.

Depending on your relationship with Intercom Trust, and the preferences you have indicated, data we hold may be used by us to send you promotional, marketing or fundraising information by post or electronic means. These types of communications can include:

- informing you of opportunities, services or events related to Intercom Trust, such as fundraising events, or training opportunities.
- news and updates about Intercom Trust and marketing or support e-newsletters if you have signed up to receive them.



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- information about our fundraising activities, including occasional targeted requests to consider giving financial support to Intercom Trust, or to ask you to consider supporting us in other ways.
- dealing with enquiries and complaints made by you.
- where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with your wishes.
- other relevant communications based upon your relationship with Intercom Trust.

# Lawful Basis for using your Information

There are lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that that Intercom Trust may have a 'legitimate interest' in processing your information.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure we take into account your rights and interests and balance those against our 'legitimate interest'. For example, we may need information about your health and well-being in order to provide you with the best service. This information is called 'special category data' but we will not share this unless with your express consent.

# **NHS National Data Opt-Out**

We only use the information we collect for and about clients for the purposes of individual care. We do not process or transfer any identifiable data for purposes beyond individual care. We are therefore not able to directly enable clients to opt-out of NHS Data being shared beyond the use of individual care and would advise clients to speak to their GP or similar provider if they wish to do so.

# Lawfully Sharing your Information

We may share your information with another individual or organisation with your explicit consent. In addition, we may disclose information about you:



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- to the extent that we are required to do so by law (safeguarding)
- in connection with any legal proceedings or prospective legal proceedings

## Security of your Personal Data

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. Your data will be stored securely in locked filing cabinets and electronically in password protected files and databases.

We also store all the personal information you provide on our secure password- and firewall- protected servers. Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We are committed to ensuring the privacy of our users and the security of the data provided to us. Intercom Trust regularly reviews processes and procedures to ensure we are up to date with the latest security practices and holds all data in line with GDPR.

## How Long will we keep your Data?

If you are a service user we keep your data for 7 years after you have finished working with us and then we shred and delete. If you are a donor/supporter etc. we will also keep your data for as long as you give us permission to hold it but otherwise for 7 years after our first contact with you.

# Automated decisions

We do not use any automated decision making.

# Your Rights

We do not give out, sell or trade our mailing list data with third parties. The information you provide will be used primarily to deliver services to you, to further our charitable aims including fundraising activities, to gather feedback and also keep you informed about Intercom Trust' activities. If at any time you no longer wish to receive



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communications from us or for any other query, please contact our Information Governance Lead using: info@intercomtrust.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 and how long we keep it for. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence 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. You also have the right to object where we are processing your personal information for direct marketing purposes. 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 marketing), 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.

# **Exercising your rights**

Should you wish to exercise any of your rights or find out more about Intercom Trust's Data Protection Policies, please speak to a member of staff or email: office@intercomtrust.org.uk

Should you wish to make a Subject Access Request – in which you can request access to personal data we hold about you. You can find a template for this on the ICO website, or by asking a staff member to send it to you.

# Complaints

In the event that you wish to complain about the way that your personal data has been handled by Intercom Trust, you should write to the Information Governance Lead and clearly outline your case.

If you remain dissatisfied with the way your personal data has been handled, you may refer the matter to the data protection supervisory authority, the Information Commissioner's Office, whose contact details are below.

Information Commissioner's Office

Wycliffe House Water Lane Wilmslow

Intercom Trust

Lesbian, gay, bisexual and trans+ people in the South West Registered charity 1171878

Cheshire SK9 5AF Email: <u>casework@ico.org.uk</u>

# **Website Privacy**

Intercom Trust is committed to protecting the privacy of its website users. Accordingly, we strictly adhere to all accepted guidelines and will continue to review and improve our privacy policy and procedures to ensure the safety and protection of your information. Intercom Trust adheres to all UK Data Protection legislation made in Parliament and EU General Data Protection Regulations 2018 that governs the confidentiality of each website user and guarantees the privacy of all databases and client/inquirer lists. The databases remain the property of Visit Bournemouth and will not be given or shared with any other organisation, company or individual. Security systems have been put in place to expel any likelihood of unauthorised access to our database and confidential list information.

# Cookies

## What are cookies?

Cookies are widely used tiny pieces of software (files) that are installed on a computer or mobile device when an individual visits a website. Cookies allow websites to recognise that a user on an individual computer has previously visited the site. The cookies save some information about that user for when they access the site again in the future. By using and browsing out website, you consent to cookies being used in accordance with our policy. If you do not consent, you must turn off cookies or refrain from using the site. Most browsers allow you to turn off cookies. To do this, look at the 'help' menu on your browser. Switching off cookies may restrict your use of the website and/or delay or affect the way in which it operates.

What types of cookies are there?

The four main types of cookie:



<u>Strictly necessary cookies.</u> These are cookies that are essential to make a website work and enable features that users have specifically asked for. These types of cookies are commonly used with shopping baskets or e-billing. Without use of cookies, these features of the website could not operate.

<u>Performance cookies.</u> These cookies collect anonymous information about users for the purpose of assessing the performance of a website. Common uses include well-known web analytics tools such as 'Google Analytics'.

<u>Functionality cookies.</u> These are cookies that automatically remember choices that users have previously made in order to improve their experience next time they visit a website. For example, where users select their preferred settings and layout.

<u>Targeting or Advertising cookies.</u> These cookies are similar to performance cookies, in that they collect information about users' behaviour. However, this information is used at individual user level to advertise products and services to users on the basis of the behavioural information collected.

What cookies do we use? Google Analytics

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\_\_utmb

\_\_utmc

\_\_utmz

\_\_\_utmv

AddThis

\_\_atuvc

Uit

Ssh

Sshs



Ssc

Uid

Uvc

ps

Duration: 1 month - 2 years. Track usage of AddThis links.

The cookies may be set and used on other websites too. AddThis explain their cookies (anonymous tracking cookies) and offer an opt-out mechanism here.

## Links

This privacy statement applies solely to the technology of our website <u>www.intercomtrust.org.uk</u>

Our web site may contain links to other sites. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be careful that when leaving our site you should ensure you read the privacy statements of each web site that collects your personally identifiable information.

# **Consumer Privacy**

If you should have any questions or concerns regarding this Privacy Statement, please contact Intercom Trust. We recommend you periodically review our Privacy Statement as we may update it from time to time.

The main contact for Intercom Trust is <a href="mailto:office@intercomtrust.org.uk">office@intercomtrust.org.uk</a>

Intercom Trust, Wrentham Business Park, Exeter EX4 6NA