

Privacy and Cookies Policy

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process. We want everyone who comes to us for support to feel confident and comfortable with how any personal information is maintained.

This Privacy Policy was last updated on the 16th June 2019.

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1. Who we are

We are a company limited by guarantee and registered in Guernsey called Humankind LBG (66274). We are also a registered charity (CH617). We are a "data controller" for the purposes of The Data Protection (Bailiwick of Guernsey) Law, 2017. This means that we are responsible for, and control the processing of, your personal information, and is the reason we are registered with the Office of the Data Protection Authority.

2. How we collect information about you

We collect information from you in the following ways:

What you tell us: If you make use of our services or enquire about our services, register with us for training or an event, make a donation to us, ask a question about domestic abuse, purchase something, apply for a job or volunteering opportunity or otherwise provide us with your personal information, then we may record information about you. This includes when you phone us, visit our website, facebook page, make a purchase from our shops, or contact us via post, or in person.

What you tell partners or suppliers working on our behalf: We may from time to time try to increase the services we offer by making use of helplines based off-island or by employing professional counsellors. Counsellors will not record sensitive

personal information except in exceptional circumstances, and will likely only make note of key information. This information will not be shared with anyone except a qualified supervisor, and even in this event all information will be depersonalised.

When you interact with third parties: For example if you provide a donation through a third party such as Just Giving and provide consent for your personal information to be shared with us.

Via 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 and to personalise the way our website is presented to you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

Publicly available information: In order to tailor our communications with you to your background and interests we may collect information about you from publicly available sources or through third party subscription services.

3. 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 purchase or donation), as well as information you provide in any communications between us.

We will mainly use this information:

- To process donations or other payments.
- To provide the services or goods that you have requested.
- To provide administrative messages.
- To identify and verify the identity of supporters who make major gifts to assess any risks associated with accepting their donations.
- To keep a record of your interactions with us.
- To administer any volunteering arrangement.
- to safeguard our staff and volunteers

We may also use your personal information:

- To update you about our work.
- To invite you to participate in surveys or research.

Sensitive Personal Information

If you share your personal experience or the experiences of a friend or relative, we may also collect this information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties.

A special note about the Sensitive Personal Information we hold

Data Protection Law recognises that some categories of personal information are more sensitive than others such as health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs. You may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include 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.
- Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it on our blog or in other media.

4. Sharing your information for public health

By the nature of our work we may want to share your information with government agencies, law enforcement or courts. We will always seek your consent to do this and only in exceptional circumstances such as when we consider someone's life to be in danger, and by approval of our board, will it be otherwise shared.

5. Legal basis for using your information

According to data protection laws each use we make of personal information must have a "legal basis". For the data processing activities described in this policy we rely on the following bases:

Consent

Consent is given where we ask you for permission to use your information in a specific way, and you agree to this (for example when we send you marketing material via post, phone, text or e-mail). Where we use your information for a purpose based on consent, you have the right to withdraw consent for this purpose at any time.

Legal obligation

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations.

Performance of a contract / take steps at your request to prepare for entry into a contract

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this

would be if you are buying something from us, or applying to work/volunteer with us, or providing a service to us.

Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance if there were to be an emergency impacting individuals at one of our events, or a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

Legitimate interests

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their “legitimate interests” (provided that what the information is used for is fair and does not unduly impact your rights).

Legitimate interests include all of the day-to-day activities carried out with personal information for the purposes of the running of a charity.

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others’) interests in us using your information in this way.

When we use sensitive personal information we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another legal route available to us for using this type of information (for example if you have made the information manifestly public, we need to process it for employment, social security or social protection law purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

6. Marketing

We will only contact you about our work and how you can support us by phone, email or text message, if you have agreed for us to contact you in this manner.

You can update your choices or stop us sending you these communications at any time by contacting humankind@suremail.gg or clicking the unsubscribe link at the bottom of the relevant communication.

7. Sharing your Information

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

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 of your information.

We may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. Some examples of where we may share your information are with our fulfilment partners who help to create and send information to you to reduce our costs, with our partners who help us to process donations and our partners who help us to manage our social media accounts.

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

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.

8. Keeping your information safe

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilisation of encryption wherever possible.

Sending information over the internet is generally not completely secure, and we can't guarantee the security of your data while it's in transit. Any data you do send is at your own risk. We have procedures and security features in place to keep your data secure once we receive it including firewalls, anti-virus software, encryption, password protection, building security and regular staff training.

All data, electronic or otherwise, is retained in the jurisdiction of the Bailiwick of Guernsey only, with the exception of our SMS service provider that may store data in another GDPR adequate jurisdiction.

If you have any questions about the security or retention of your personal data, you can contact us at humankind@suremail.gg

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. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

9. How long we hold your information for

We retain personal data only for as long as necessary and by adherence to our internal data retention policies. These policies are written with a view to maintaining compliance with the relevant laws.

10. 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 make a complaint to us you can do so by any method. You can also direct questions or complaints to our lead supervisory authority:

The Office of the Data Protection Commissioner

St Martin's House
Le Bordage
St. Peter Port
Guernsey
GY1 1BR

Email: enquiries@odpa.gg

Telephone: +44 (0)1481 742074

Web: <https://odpa.gg/>

- **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 - i.e. with a signed request and a photocopy of photo id that shows a signature such as a driving licence or passport.
- **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.
- **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.

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

11. 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.

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 also allows us to improve the user experience.

You can opt out of all our cookies (except the strictly necessary ones). [Find out how to control and delete cookies](#) in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to..

12. 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.