Privacy Policy

S.E.N.T is a data controller registered with the UK Information Commissioner's Office registration number **ZB488731**.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data. We have policies, procedures and training in place to help our people understand their data protection responsibilities and follow the principles of data protection.

We have a nominated member of staff who serves as our Data Protection Officer. If you have any questions regarding our Privacy Policy, please email Jose Soares at info@sentuk.org

This privacy policy relates to personal information that S.E.N.T collects and uses. We are an independent charitable organisation which partners with other organisations such as the Trussell Trust, Citizens Advice, CMA and The Fuel Bank Foundation. We sometimes share personal information about service use with the Trussell Trust, CMA, Citizens Advice Enfield and The Fuel Foundation which are separate data controllers. For more information about who we share your personal data with please visit the "Sharing personal information" section below.

How we collect personal information

We may collect your personal information from you directly when:

- communicate with us for any reason, by post, telephone, text, email or via our website.
- make a donation
- visit one of the charity's services
- participate in a survey or research
- work or make an application to work or volunteer for us
- agree to help us promote our work
- interact with us as a supplier, contractor, consultant or in any other capacity.
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We may also collect personal information about you from other organisations. For example, from a referral agency like a doctor's surgery, when you are referred to our services.

The personal information that we collect

We only collect personal information that we genuinely need.

This may include:

- Contact details such as name, address, email address and phone numbers
- Date of birth and gender
- Nationality
- Any information that you give us relating to your circumstances and why you used one of our services
- Financial information that you provide to us, for example, when making a donation
- For job and volunteer applicants:
    - your bank account details, tax and residency status
    - references from previous employers or educational institutions

- contact details for your family members and next of kin
- qualifications
- information concerning your health and medical conditions
- information about your race, ethnicity and sexual orientation
- details of criminal convictions.

Our legal basis for processing personal information
Our legal basis for processing personal information is usually for our legitimate interests, or your consent, or for the performance of a contract or to meet our legal obligations.

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

We will ask you to opt in to receive marketing emails and text messages from us. You can unsubscribe from this at any time.

Usually, we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe someone's life is at risk.

We may process personal information because it is 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), or because we are legally obliged to do so, for example, to meet employment or charity laws.

Why we collect personal information
We collect and use personal information about people who use our services, supporters, job applicants and volunteers for several reasons.

<u>Assisting people that use our services.</u>
We collect personal information from you directly if you have to use one of our services, or via an organisation that refers you to our services. Our legal basis for using this information is legitimate interest as we wish to respond to your need for help and ensure that we are providing help when and where it is most needed. Depending on the service you are accessing we will share this information with the Trussell Trust, Citizens Advice Enfield, CMA and/or The Fuel Bank Foundation who work with us and other charities to support our work and use anonymised statistical data to campaign at a national level to challenge the structural issues.

<u>Developing relationships with supporters</u>
Our work is made possible because of the generosity of our supporters. We need a good understanding of our supporters so that we can communicate with them effectively and appropriately. We will only send you marketing communications via email or text where you have opted into receiving them. You can unsubscribe from receiving these communications at any time by contacting Jose Soares at info@sentuk.org.

<u>Processing donations</u>
If you kindly make a donation to us (of goods or money), we will use your personal information to collect your donation and maintain a record of our supporters. Our legal basis for using your personal information for this purpose is to fulfil our legitimate interest and fundraising objective. We are legally required by HMRC to collect some personal information if you choose to gift aid your financial donation.

Dealing with complaints and appeals

If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal. This may include sharing relevant information with the person whom the complaint has been made about. Our legal basis for using personal information for this purpose is legitimate interest.

Promoting our work

We will use personal information that you share with us if you agree to help us promote our work. This might include photographs and videos. For example, we may use your information in case studies and stories that we publish or share with the media. We will only use your information for this purpose if you have given your consent for us to do so.

Carrying out surveys and research

If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We may use a university or work with The Trussell Trust to undertake analysis of survey responses. Survey results are anonymised before being shared or published.

Employee and volunteer administration and development

We will process personal information of our employees to fulfil our contract with them, and to meet our legal obligations as an employer. This includes payroll processing and the provision of training. We are required by law to share some financial information with the HMRC. We may also need to share some personal information with other organisations, for example solicitors, pension providers. Where you volunteer with us, we collect personal information to support the administration of your volunteering activity. Our lawful for processing volunteers' personal information is our legitimate interest or to meet our legal obligations. We share personal information about our employees and volunteers with the Trussell Trust to support the work of the Foodbank Network.

Recruitment

If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your enquiry. We will not store this information for any purpose other than that relating to your application. Our legal basis for using your information in this way is for our legitimate interest.

Undertaking safeguarding activities including DBS checks

When necessary, we process relevant personal information about employees and volunteers for safeguarding purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of. It may be necessary to share some personal information with relevant authorities such as the police. Our legal basis for this processing is to meet our legal obligations.

Processing expenses

We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.

Governance

We process relevant personal information about existing and potential trustee members for governance purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees. Our legal basis for this processing is to meet our legal obligations with the Charity Commission and Companies House.

Sharing personal information
We will only share your personal information where we need to, where someone's life is at risk or we are required to do so by law.

We may share your personal information with the Trussell Trust, CMA, Citizens Advice Enfield and The Fuel Foundation which are separate data controllers. Where we share your personal information we will inform you as outlined in the section "Why we collect personal information" above. We have a data-sharing agreements in place which sets out what information is shared, why and how we share the data.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers. We have data processing agreements or clauses in place with any data processors that we may use.

We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.

Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

International transfers of data
We may need to transfer some personal data to the third parties described above who are located outside of the UK. In such cases, we will take appropriate measures to ensure your personal data remains protected. If the organisation is based outside of the UK and in a country that is not protected by an adequacy decision (providing an adequate level of data protection) we will take appropriate safeguards, such as implementing approved standard contractual clauses as part of our agreements with our processors.
If you have any questions or need more information regarding international transfers of your personal data, please contact us at info@sentuk.org

Cookies and aggregate information collected from our website
We use cookies on our website to store information about how you use our website. A cookie is a piece of data stored on the user's computer tied to information about the user. This enables us to make navigation easier and direct you to information that best corresponds to your interests and country.

Aggregate information is collected from users using Google Analytics. This information includes users' Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages and number of unique visits. This information is not linked to personal profiles or to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer the website and to gather broad demographic information of our website users. To view our cookies policy visit https://www.sentlondon.co.uk/cookie-policy

Your rights
If you no longer wish to receive communications about products and services from us, please contact Jose Soares at info@sentuk.org
You can also unsubscribe at any time to emails that we may send to you about the products and services that we think will be of interest to you. A link to unsubscribe from all direct marketing will be included in any communications.
You also have the right to:

- Ask us for copies of your personal information.
- Tell us to change or correct your personal information if it is incomplete or inaccurate.
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
- Receive from us the personal information we hold about you that you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you.

For all requests please contact us at info@sentuk.org. We will respond to any request within 28 days.

Please note that we may be entitled to refuse requests where exceptions apply, for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

How long we keep your personal information
We will hold your personal information only for as long as necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment, or audit purposes. We have in place a personal data retention schedule which sets out how long we keep your personal information for. Please contact info@sentuk.org if you wish to see our personal data retention schedule.

Changes to this policy
This Privacy Policy may change from time to time. We recommend that you please visit this webpage periodically to keep up to date with the changes in our Privacy Policy.

Making a complaint to the Information Commissioner's Office
If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Signed: _____ **Date:** __08__ / __05__ / ___2024_____

Name: Stuart Emsley
Position: Chair of Trustees **Review Date:** __07__ / __05__ / ___2024_____