

PRIVACY POLICY

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

Introduction

Compass Children's Charity is a charitable company (1073903) registered in England and Wales with registered company number 3651947

At Compass Children's Charity we take your privacy very seriously and are committed to protecting your personal information.

This privacy policy explains how we, Compass Children's Charity may collect and use the information you give us.

Our Data Protection Officer is Tamar Good.

If you have any questions regarding our Privacy Policy, please write to:

The Data Protection Officer – Tamar Good
Compass Children's Charity
Unit 2, The Business Exchange, Rockingham Road, Kettering, Northants, NN16 8JX

Email: contact@compasschildrenscharity.org.uk

This policy includes:

- How we collect information
- Where we collect information from
- What personal information we collect
- How we will use your personal information
- Our use of cookies
- Children's data
- How we keep your data safe and who has access to it
- Consent
- How we keep your information up to date
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How we collect information

We may collect information about you whenever you interact with us, for example when you:

- Enquire about our activities or services, visit our website or donate to us

- Sign up to receive updates on our work or our activities
- Post content to our website/social media sites (including Facebook)
- Apply for a job or volunteer for us
- Attend a meeting with us and provide us with information about you
- Take part in one of our events or fundraise on our behalf
- Contact us through the following channels: online, email, phone, social media or post

Where we collect information from

Compass Children's Charity may collect information in the following ways:

- **When you give us information directly:** You may provide your details to us when you request specific information, make a donation, or participate in one of our events.
- **When you give us information indirectly:** Your information may be shared with us when you use other fundraising sites and provide your consent to be contacted by Compass Children's Charity. For example, if you are fundraising for us via Just Giving or Virgin Money, Give to Live, Easyfundraising etc... These organisations will have their own privacy policy and/or privacy statements, so please do ensure you understand this when providing your data. When your employer or colleague pass your details on to us we will clarify what you are consenting to in terms of communication.
- **When you have given other organisations permission to share it:** You may have provided your details to another organisation that works with Compass Children's Charity. For example, in order to sign up to a third-party event, or if you purchased a product via our website. However, when working with other organisations, we work to ensure it's completely clear to you that your information will be shared with Compass Children's Charity. The information we get from these services depends on your settings or the response choices you give, so you should regularly check what you have agreed to with third party organisations.
- **Social media:** Depending on your settings or the privacy policies for social media and messaging services like Facebook and Twitter, you might give us permission to access information from those accounts or services.
- **When we collect information when you are using our website:** Upon visiting our website, information about your visit is recorded and stored. See the section below on the use of cookies for more details.
- **When your information is available from other public sources:** We may collect personal details about you from the public domain, such as from social networks, company websites, political and property registers, and news archives. Please see the section below for more details.

What categories of personal information we collect

The type and quantity of information we collect and how we use it depends on why you are providing it.

If you support us, for example by making a donation, volunteering, registering to fundraise, or signing up for an event we may collect where relevant:

- Your name
- Your contact details (full address, email address and phone number)

- Your date of birth
- Your bank or credit card details (only if you are making a donation)
- Where it is appropriate, we may ask for your reason for giving and your specific interests relating to Compass Children's Charity's work

If you visit our website anonymously, we may however still record information about:

- the areas of the website you visit
- the amount of time you spend on the site
- whether you are new to the site, or have visited it before
- how you came to our website – for example, through an email link or a search engine
- the type of computer, browser, network location and internet connection you use.

Our use of cookies

'Cookies' are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. Essentially, a cookie takes the form of a small text file deposited on your computer's hard drive. We provide separate information about our use of cookies in our [Cookie Policy](#).

How we will use your personal information

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

- To provide you with the services or information you have requested
- To update you about any changes to our services
- To administer your donation, including Gift Aid processing
- To maintain our organisational 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 analyse your website behaviour
- To tailor advertising that is presented to you on the internet according to your interests, preferences and other characteristics
- 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)

We promise to make all reasonable efforts to keep your details secure and will only share them with suppliers or professional agents working on our behalf, for example professional fundraising organisations sending out letters of appeal, or telephone agencies making fundraising calls on our behalf.

Except as required by law, we will never share your details with other organisations to use for their own purposes.

Facebook marketing

We may participate in Facebook's 'Custom Audience' programme which enables us to display adverts to our existing supporters when they visit Facebook. This will entail providing your email address, mobile number and address to Facebook in an encrypted way so as to anonymise the information but so they can determine whether you are a registered account holder with them. Our adverts may then appear when you access Facebook. Your data is sent in an encrypted format that is deleted by Facebook if it does not match with a Facebook account.

Find out more information about ['Custom Audiences'](#) and [Facebook's Data Policy](#).

Children's data

While we do not actively collect information from supporters aged under 18, we appreciate that our supporters are of all ages. Where appropriate, we will always ask for consent from a parent or guardian to collect information about supporters who are children. All Compass Children's Charity 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.

How we keep your data safe and who has access to it

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

We ensure that there are appropriate technical controls in place to protect your personal details. For example, we use encryption technology on our websites and carry out regular security reviews on our network.

We always ensure only authorised personnel (for example Compass Children's Charity staff, volunteers or contractors) have access to your information, and that they are appropriately trained to manage your data.

Despite all of our precautions, no data transmission over the internet can be guaranteed to be 100% secure. So, while 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. However, any payment card details (such as credit or debit cards) we receive through our website are passed securely to our payment processing providers who meet the required Payment Card Industry (PCI) Security Standards.

For some processes we may use the services of a service provider outside the European Economic Area (EEA). However, we will require them to process your information in compliance with the European data protection regulations. By submitting your personal information to us, you agree that we may transfer, store or process your data at a location outside the EEA as outlined above. We will take all steps reasonably necessary to ensure that your data is processed securely and in accordance with this privacy policy.

Your consent

By giving us your personal information, you consent to us collecting and using that information in the ways that we describe in this privacy policy and/or that you have specifically consented to.

You also consent to us transferring your information to countries or jurisdictions which may not provide the same level of data protection as the UK, if necessary for any of the above purposes. If we do transfer your information in this way, we will comply with our legal obligations as a data controller under the Data Protection Act 1998 and, if we need to, put in place a contract with the companies we use to process information to ensure your details are properly protected.

Marketing consent

We will only send you marketing information by email, SMS, or phone if you have given us specific consent to do so. If you withdraw your consent and then subsequently opt in, then your most recent preference may supersede.

If you have responded to a letter of appeal, you may also receive fundraising mail, which you can opt out of at any time.

You can opt out of us using your personal details for marketing at any time either by calling us on 01536 526447 or emailing contact@compasschildrenscharity.org.uk

or writing to Compass Children's Charity, Unit 2, The Business Exchange, Rockingham Road, NN16 8JX –we will be happy to answer any queries you may have.

How we keep your information up to date

Where possible, we try to keep your records up to date. However, we really appreciate it if you let us know when your contact details change.

How long we keep your information for

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of any donations you have made for at least six years.

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.

Our legal basis for processing your information

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.

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.

To use your personal information in the ways described, Compass Children's Charity relies on two main legal reasons.

1: Your consent to receive communications by mobile phone, email or text message. We use this consent to send emails and texts as well as targeted advertising, marketing and information including social media sites like Facebook. These communications help us to show supporters the impact of their donations and raise further funds to support children at risk on the streets.

2: The legitimate interest legal basis allows you to receive communications by post or telephone when you support Compass Children's Charity with a donation or when you request to receive information about our work, events or services. Compass Children's Charity has a legitimate interest to use your personal information in order to communicate with you but will respect your right to opt out of any communication should you wish to do so.

If you are registered with the Telephone Preference Service (TPS) the only time we'll contact you by telephone is if you have consented directly to us making phone calls to you or for administrative purposes.

Your rights

You retain control of how we use your data and you have the right to ask us to stop processing your personal information, which we will do. In some circumstances, we may legally be required to retain your personal information for audit purposes. However, this will be discussed with you depending on your requirements. Please contact contact@compasschildrenscharity.org.uk or call us on 01536 526447 if you have any concerns.

You also have the right to request a copy of the information we hold about you. If you want to access your information, please contact: The Data Protection Officer, Compass Children's Charity, Unit 2, The Business Exchange, Rockingham Road, Kettering, NN16 8JX or email contact@compasschildrenscharity.org.uk

Under the General Data Protection Regulation, (GDPR) which came into effect in the UK in May 2018, you are also granted a number of additional rights. These include:

- The right to access your personal information – known as a subject access request
- The right to have your personal information that we no longer need erased from our records
- The right to have inaccurate personal information amended
- The right to ask us to stop using your information in certain situations
- The right to object to your personal information being used for marketing or profile
- A right to have a copy of your personal information provided for reuse in another service

For more information on these rights please read the relevant guidance issued by the ICO at <https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/individuals-rights/>

If you would like to make a complaint about how we process your personal data, please contact our Data Protection Officer.

If you are not happy with how your complaint is dealt with, you should contact the [Information Commissioner's Office](#). Alternatively, you are entitled to make a complaint to the Information Commissioner's Office without first referring your complaint to us.

For [further information please see the Information Commissioner's guidance](#).

Changes to this privacy policy

This policy may change from time to time. If we make any significant changes to this policy, we will publicise these changes clearly on our website or contact you directly with more information.