

HACKNEY DOORWAYS

Privacy Policy

Policy agreed by the Board of Trustees	October 2018
Policy to be reviewed by Board of Trustees	October 2020

How we respect privacy when we deal with personal information collected by our organisation

This Privacy Policy applies to information Hackney Doorways (also known as Hackney Winter Night Shelter) (the Charity) collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it. If you have any comments or questions about this notice, please contact the Director: christina@hwns.org.uk

1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Registering or becoming a guest	Name, referral agency details, contact details, financial support, NI number, demographic data, current or pending court cases or bail, next of kin, GP, history with the charity, health information, immigration status, dietary requirements, housing history, employment details, risk assessment,	Legitimate interests - it is necessary for us to read and store your information so that we can respond in the way that you would expect and to provide a safe service to you.

	outcome data, case notes.	
Volunteering with us	Name, contact details, over 18, next of kin, disability, area of interest, language, training record	Legitimate interests - it is necessary for us to read and store your information so that we can ensure you get a good volunteering experience.
Supporters and donors	Name, email address, address, records of donations	Legitimate interests – it is necessary for us to keep records of financial transactions and donors to report to HMRC and our accountants.

2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- Help you stay safe whilst staying as a guest of the Charity and support you in moving on to other housing
- Ensure you get the information you need to volunteer with us and we match you to a volunteering opportunity.

3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- or where your safety and security are at risk; or
- Within the Shelter staff, Lead Hosts (volunteers) and trustees of the charity for the purpose of the effective running of the charity

We will not only pass data to third parties outside of the EU.

4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

We detail our retention policy in our data register.

5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right of access to your information.

- You have the right to ask for rectification and/or deletion of your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with the Director.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you.

However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences or and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and are affected.