

Acts West Wales
founding charity of Pembrokeshire Foodbank and Cilrath Acre

Privacy Notice

Acts West Wales is a registered charity based in Pembrokeshire West Wales.

The Trustees take responsibility for ensuring all data management and actions to protect privacy comply with UK General Data Protection Regulation 2021.

For the purposes of the regulations the Trustees are the data controller and can be contacted via the registered address of the charity: Grace Court House, Market Square, Narberth, Pembrokeshire, SA67 7AU.

If you have any questions about this privacy statement and policy or how and why we process personal data, please contact the Secretary of the Trustees via email: info@pembrokeshire.foodbank.org.uk.

How we manage your information

This privacy notice tells you what to expect when Acts West Wales collects personal information. It applies to information we collect about:

- Any person who contacts or connects with us whether employees, volunteers or members of the public;
- Visitors to our website (see on our website our Privacy and Cookies Policy when accessing our online services and information);
- People who use our services, e.g. subscribe to our newsletter, request a publication or advice from us;
- Event, facility and services attendees;
- Job applicants and our current and former employees.

We are committed to ensuring that there are appropriate controls in place to protect your personal details including from misuse and unauthorised access.

Often we record and use your data because it is in your interest for us to do so, so we can provide you the services or opportunities you have approached us for or so we can effectively find resources, donations and volunteers which are fundamental to Acts West Wales providing its charitable services to the community. There are circumstances when it is required of us to ask you to indicate your express consent before we record and use your personal information.

We do not sell or share your personal details with third parties for them to use for marketing purposes. If a local organisation has information to share which we feel is relevant to you, we do this on their behalf.

We may need to disclose your personal information upon request to regulatory and government bodies, law enforcement agencies and suppliers we engage to process data on our behalf. We may also merge or partner with other organisations and in so doing, acquire or transfer information.

What information do we collect about you?

The personal data we collect about you may vary depending on the nature of your interactions with us or the service you request from us. As a minimum we will usually collect from you your name, your email address and your telephone number. Reasons for collecting information from you include:

- If you are a Foodbank client we will collect details of your household and their circumstances to facilitate us giving you the correct assistance;
- When you book a place for any of our events, seek to volunteer with us or request a service or support from us we may collect your name, email address and telephone number so that we can contact you in case of changes to the event or service being offered;
- If you contact us to ask us for advice or help we may collect your telephone number so that we can contact you in future;
- When you make a payment or give a donation to Acts West Wales we may request information from you such as bank card or bank account information for the purposes of taking payment or other details that are legally required for Gift Aided donations;
- If you correspond with us generally, for example to raise a query, comment or complain about any of our services, we will also collect any other information you choose to send to us in that correspondence.

How do we use the information you provide?

Where you have disclosed your information to us, we use information:

- Because it is necessary to administer the services you have requested from us and to fulfil our obligations to you in providing these services;
- In order to pursue Acts West Wales legitimate interests to inform you by email or other means of events or services run by us or third parties which we think may interest you.
- We may from time to time email you with information about events, activities and volunteer days we think you will be interested in.
- If you sign up to our news and information mailing list, we will use your personal information to provide you with information that relates to Act West Wales including opportunities to support the work we do.

We process your personal data only on this basis it does not prejudice your own privacy rights. We will try to do this in the format you have requested and in accordance with any preferences you have expressed.

Visitors to our website

See on our website our Privacy and Cookies Policy when accessing our online services and information.

Job and volunteer applicants

If you apply to work or volunteer for Acts West Wales we will use the information you supply to us to process your application and to monitor recruitment statistics. We may disclose personal information to a third party, for example where we want to take up a reference, obtain a check from the Disclosure and Barring Service or fulfilling payroll and HMRC requirements and where appropriate we will let you know first.

Data retention

We keep data for as long as there is a need to keep it in connection with the purposes for which it was collected.

We may keep your personal data after a particular matter or exchange has concluded but purely for record keeping purposes and to be able to respond to queries. In some cases, we are also obliged to retain your personal data to comply with legal or statutory obligations (for example, to keep records of contractual or financial matters).

Whilst the specific time periods vary depending on the circumstances, in general we will not keep records that include personal data for more than 6 years after a particular matter or exchange has concluded.

Your rights

You have a number of rights in relation to your personal data. These include the right to:

- Find out how we process your personal data;
- Request that your personal data is corrected if you believe it is incorrect or inaccurate;
- Obtain restriction on our, or object to, processing of your personal data;
- Ask us not to process your personal data for our own marketing purposes;
- Withdraw your consent to our processing of your personal data;
- Obtain a copy of your personal information which we hold about you.

We will take steps to verify your identity before responding to your request and will respond as soon as possible.

You can exercise your right to prevent such processing at any time by clicking on the unsubscribe link at the bottom of any e-mail newsletter we have sent to you or by contacting us at: info@pembrokeshire.foodbank.org.uk.

Disclosure of your information

The personal data you give Acts West Wales is held securely. We utilise the secure Trussell Trust database for recording and facilitating the work of the Foodbank. We may outsource functions, such as the use of marketing apps including Eventbrite, Mail Chimp etc. These third party processors will be responsible for the safe and confidential processing of personal data on our behalf. We may also disclose personal information where permitted by law or where we are under a duty (including for crime and fraud prevention).

How we collect your information

The ways in which we collect your information includes:

- when you have given us your details at events or at direct one to one consultations;
- when you contact us via our websites or social media accounts;
- When you email us with information or questions about Cilrath Acre or Pembrokeshire Foodbank;
- We may receive your details from charitable giving platforms such as Local Giving or Eventbrite if you have signed up to one of our events;
- When you otherwise engage with us via email or other means.
- From referral agencies.

Data Protection Policy

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1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the UK General Data Protection Regulation 2021 which requires that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

This policy applies to all personal data processed by the Charity.

Collectively "the trustees" shall take overall responsibility for the Charity's ongoing compliance with this policy and on a day to day management basis the "Responsible Person" shall be the employed Foodbank Manager and the Cilrath Acre Project Manager.

This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests

Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

5. Data minimisation

a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

The Charity shall take reasonable steps to ensure personal data is accurate.

Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

The Charity shall ensure that personal data is stored securely and where appropriate by using modern software that is kept- up-to-date. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. When personal data is deleted this should be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Policy adopted: 8th January 2023

Policy Review date: 8th January 2024