



Charity registered in England and Wales No. 1187449

# GENERAL DATA PROTECTION PRIVACY POLICY NOTICE (INCLUDING USE OF COOKIES)

Odysians [a charitable incorporated organisation, registered in England and Wales No. 1187449] (“we”) promise to respect the confidentiality of any personal data you share with us, or that we have access to through your interactions with us, to keep it safe, and we will always take every effort to protect your privacy.

We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information; we promise we will never do anything with your details that you wouldn’t reasonably expect.

Developing a better understanding of our members and donors is crucial, and your personal data allows us to manage your membership and provide the services you are entitled to.

It is expected that trustees and officers may also process member personal data on behalf of Odysians and they too will also be bound by this privacy notice.

## **We collect information in the following ways:**

### **When you give it to us DIRECTLY**

There are many ways you may give us your information. For example, when you join as a member, begin volunteering, make a donation, purchase our products or communicate with us either by phone, in writing, including email or in person. We are responsible for your data at all times.

### **When you give it to us INDIRECTLY**

Your information may be shared with us by independent organisations, for example sites like PayPal Giving or other such services. These independent third parties will only share your information when you have consented. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

### **Via Social Media**

Depending on your settings or the privacy notices for social media and messaging services like Facebook, WhatsApp, LinkedIn or Twitter, you might give us permission to access information from those accounts or services.

### **Via information available publicly**

This may include information found in places such as websites, Companies House and information that has been published in articles/newspapers.

### **Cookies**

We use cookies placed on the browser of your device to collect data about how you use our websites and systems. Cookies are small pieces of information stored on your device in the browser.

For more information about how we use cookies please refer to our cookie policy.

## **What personal information we collect and how we use it**

We will only ever capture the minimum amount of information that we need to in relation to your membership, donation or services we provide to you and we promise to keep your information secure. The personal data we will usually collect is:

- Your name
- Your contact details
- Your date of birth
- Your bank or credit card details (as relevant to the service provided)
- Details of the enquiry, service or product

Where it is appropriate, we may also ask for additional information.

## **How we will use your data**

We will use your personal data for the legitimate interest of conducting core business activities, these will include:

- Administer your membership or donation, including processing Gift Aid
- Provide you with the services, products or information you asked for
- Check your identity and your suitability to take part in our general activities, including Disclosure and Barring Service checks
- Communicating organisational messages and information to trustees and officers
- Facilitate conference, training seminars, meetings, and other special event planning
- Appointments to committees, offices, task forces and other assignments within the charity
- To present our website and its contents to you and to allow you to participate in interactive features on our website
- Keep a record of your relationship with us

- Understand how we can improve our services, products or information
- In any other way we may describe when you provide the information
- For any other purposes with your consent

## **Sensitive information**

We may collect the following personal information on members classified as 'sensitive' under GDPR:

- Medical information to ascertain your care needs and assess the risks in relations to our activities.

## **Employees**

We do not have employees.

## **Data Sharing**

### **1) Our service/host providers**

In the course of our legitimate business activities, there may be a need for us to share, or give access to, your personal data to third parties that provide us with services or host our applications/software that you may access, for instance:

- Banking organisations – those that provide our banking/payment services
- HMRC – for Gift Aid, tax and employment details
- Google and google analytics – emails, mailing lists, application processing, and database management
- Ninjaforms – electronic application forms
- Wordpress – website content management
- Cloudflare – website hosting

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers.

### **2) Sharing with third parties**

We will never commercially sell your personal data to anyone else.

We will only ever share your personal data in other circumstances, not listed above, if we have your explicit and informed consent at the time of collection. However, we may need to disclose your details if required to the police, other agencies, for example HMRC, regulatory bodies or our legal advisors.

## **How we keep your information safe and who has access to it**

We ensure that there are appropriate physical and technical controls in place to protect your personal details. For example, confidential paper records are securely stored, our online forms are encrypted and our network is protected and routinely monitored. Confidential paper waste is shredded at our premises by on-site secure document disposal contractors.

We undertake regular reviews of who has access to information that we hold to ensure that your personal information is only accessible by appropriate trustees, officers and our service/host providers. We do comprehensive checks on the companies we use before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they may have access to as part of providing those services.

We have a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, we will do this within 72 hours of becoming aware of the breach. If a breach is detected and likely to result in a high risk of adversely affecting you, we will inform you without undue delay.

## **Where we store your information**

Your personal information will be hosted securely within the UK, the EU or in compliant jurisdictions in the Channel Islands or the USA.

By submitting your personal information to us you understand your personal data may be transferred, stored and processed at a location outside the EEA.

## **How long we retain your information and how we keep it up to date**

We will only keep your information for as long as we need it to assist you with your enquiry, process your membership, donation, event registration or other services associated to your application. There are statutory timescales on how long we should keep your information, for example, gift aid transactions must be retained indefinitely, employment records for 6 years after an employee leaves, financial records must be kept for 7 years, information associated with Health & Safety for three years after an event. We shall delete your information according to these statutory limits, or according to guidance issued by the Information Commissioner.

In addition, where necessary, we will keep your information accurate and up-to-date, and you may notify us of any changes by contacting Odysians.

## **Your rights**

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the [Information Commissioners website](#)

1. You have a right to be informed when your personal data is being collected, what is collected and how it will be used or shared.
2. You have a right of access to your personal data: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal data. You can also request a copy of the information which we hold on you. This information will be provided free of charge, unless the request is found to be manifestly unfounded or excessive then a reasonable fee will be charged. The application should be made in writing, by letter or email, and addressed to the Odysians Secretary, contact details shown below, enclosing two proofs of identification. Applicants should be aware that where requests are manifestly unfounded or excessive, in particular because they are repetitive, Odysians can:
  - charge a reasonable fee taking into account the administrative costs of providing the information; or
  - refuse to respond.
3. You have a right in certain circumstances to have inaccurate personal data rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.
4. You have a right in certain circumstances to object to the processing of your personal data for such reasons as direct marketing, automated decision making, profiling; although we can confirm we make no decisions on you using an automated process.
5. You have a right in certain circumstances to data portability.
6. In certain situations, these rights may not apply, for example if you are a valid applicant we will need to communicate with you about your application and those services afforded to you as part of that participating in our activities.
7. We collect and process your personal data through legitimate interests or because you have provided it to us to enable us to deliver a service to you. We will only process your personal data as you would reasonably expect us to. You can opt out of our general member mailings at any time.

Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

## Changes to this privacy notice

We may change this privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website [www.odysians.com](http://www.odysians.com) or by notifying you directly.

## Our contact details

Odysians  
71 Pinehurst Road  
West Moors

Ferndown  
BH22 0AJ

Email: [\\_secretary@odyssians.com](mailto:_secretary@odyssians.com)

## **Complaints**

If you are unhappy with how we have processed your personal information, please firstly contact the Odysians Secretary, details above. If you are still unhappy you may contact the following:

## **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or +44 1625 545 745

*[This privacy notice was last reviewed and updated 14 February 2020]*