

## Centre of Sign-Sight-Sound



**Policy Name:** Privacy

### Who we are

Centre of Sign-Sight-Sound is a registered charity (no. 1048017) and company limited by guarantee (no. 2959589) supporting people with a sensory loss.

At Centre of Sign-Sight-Sound (COS), we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect 'Personal Information' about you and how we use it, the conditions under which we may disclose it to others and how we keep it secure. 'Personal Information' means information which can identify a living individual.

### Changes to this notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your 'Personal Information'.

Any questions regarding this Policy and our privacy practices should be sent by email to [info@signsightsound.org.uk](mailto:info@signsightsound.org.uk) or by writing to Centre of Sign-Sight-Sound, 77 Conway Road, Colwyn Bay, LL29 7LN. Alternatively, you can telephone 01492 530013

### What type of information is collected from you?

The 'Personal Information' we collect will depend on why you are providing it and how we are using it, but might include your name, address, date of birth, contact information including email address.

As an organisation we collect and use 'Personal information' for a variety of reasons and in a variety of ways depending on the activity you are taking part in when you share the information.

When we collect 'Personal Information', we will always explain clearly what information we are collecting, why we are collecting it and how we will use it.

We will always make sure we have a lawful basis for processing your 'Personal Information'.

We may also collect sensitive information including race, gender, religion and sexual orientation.

If the information is collected via our website we may also collect your IP address and information regarding what pages are accessed and when.

If you do not provide us with your 'Personal Information', we may not be able to provide you with any of our services.

### **Legitimate Interests**

If you receive a communication from us that mentions our "Legitimate Interest", then please be assured you are still in control of how we use your 'Personal Information'. "Legitimate Interest" is one of the lawful bases we can rely on to process your 'Personal Information', and when we use this basis we have to consider your privacy rights and whether these outweigh our legitimate interests. You can easily stop or change how we use your Personal Information, and we will explain how you can contact us to do so.

"Legitimate Interests" means the interests of our organisation in achieving our aims. For example, we have an interest in communicating with our supporters to provide information on our work helping those living with a sensory loss, how to support our work, including fundraising, campaigning and volunteering.

When we process your 'Personal Information' for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate interests do not automatically override your interests - we will not use your 'Personal Information' for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law)

If you have any concerns about the processing of your 'Personal Information' based on our legitimate interests, you have the right to object. For more information on your rights, please see below.

### **How do we collect information from you?**

We may obtain your information in the following ways:

#### **Directly from you**

If you give us your information directly for any reason – such as becoming a member or volunteer or requesting services from us, we will ensure you are given the important information about how we will use and look after your information at the time.

#### **Indirectly**

If we receive your information from another source and not directly from you (for example by fundraising sites like Just Giving, or if we receive referral information about you from other agencies or your care manager) we will also ensure you are given all the important information about how we will use and look after your information as soon as possible and within one month of receiving your information (unless it is impossible to do so or would involve disproportionate effort). If it is disproportionate for us to contact you with this information, you can always find a copy of this privacy policy on our website.

#### **When you visit our website**

We use cookies on our website to collect information about your visit to our website, including the pages you view, the links that you click on and other actions taken within our website. We also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring Web site addresses. This data about your site visit is not linked to any information you enter into any forms on our website (such as signing up for membership, or purchasing in our online shop), or to any other information we hold about you. Read more information below about our cookie policy.

#### **When you access COS's Social Media**

We might also obtain your 'Personal Information' through your use of social media such as Facebook, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

- Facebook
- Twitter
- LinkedIn

#### **When the information is publicly available**

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations. In this scenario, we may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from Companies House. This is a form of profiling (see below) to build up a picture of donors. We will not retain publicly available data relating to major donors without informing them, which will be done at the earliest practical opportunity.

#### **Facebook and other Social Media Sites**

We may share your email address and phone number with Facebook or other social media sites to match your account on our behalf to show you COS content while using these services. This information may be used by the social media site on our behalf to identify other users of these sites with similar interest whom we believe would be interested in us, in order for them to be shown COS content. We do not receive any 'Personal information' from the social media sites or see your profile information as part of this process.

We will inform you when we intend to do this, and we keep your data secure by encrypting it. No data we hold about you is retained by the third party.

To find out more about this process or prevent this use of your data, you can either contact us directly or you can do this via the social media site:

- Facebook
- LinkedIn
- Twitter

Updating your preferences will not guarantee that you never see COS content on social media, since the social media site may select you based on other criteria and without your data having been provided by us.

### **Profiling and Automated Decision making**

Profiling is any form of automated processing of personal data to build up a picture of a person, in particular to analyse or predict aspects about that person's economic situation, personal preferences or interests. We may use the information we hold about you based on your interactions with us in order to build our relationship with you, offer you the right help or information and personalise things we offer to you. Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We will always inform you if we are processing your information in this way.

### **How is your information used?**

We may use your information to:

- Provide you with information and / or services;
- Process orders that you have submitted;
- Process a donation that you have made;
- To carry out our obligations arising from any contracts entered into by you and us;
- Dealing with entries into a competition or requests for membership;
- Seek your views or comments on the services we provide;
- Notify you of changes to our services;
- Send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities, promotions of our associated companies goods and services;
- Process a job application.

We review our retention periods for 'Personal Information' on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We will hold your 'Personal Information' on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

### **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Please be assured that you will not receive offers from other companies or organisations as a result of giving your details to us. We will not sell, rent or lease any 'Personal Information' we collect to any third parties.

**Third Party Service Providers working on our behalf:**

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use third party service providers, we disclose only the 'Personal Information' that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the COS network for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

**Third Party Product Providers we work in association with:**

We work closely with various third party product providers to bring you a range of quality and reliable products and services designed to meet the needs of people with a Sensory Loss (e.g.). When you enquire about or purchase one or more of these products, the relevant third party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third party product providers will share your information with us which we will use in accordance with this Privacy Policy.

When you are using our secure online donation pages, your donation is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

We may transfer your 'Personal Information' to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## **Your Choices and Your Rights**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for people with a sensory loss and our products and services, then you

can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent.

We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

You can change your marketing preferences at any time by contacting us by email: [info@signsightsound.org.uk](mailto:info@signsightsound.org.uk) or telephone on 01492 530013.

### **How to stop or change how we communicate with you**

If at any time you wish to stop or change how we communicate with you, or update the information we hold, please do get in touch.

### **How you can access and update your information**

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [info@signsightsound.org.uk](mailto:info@signsightsound.org.uk), or write to us at: 77 Conway Road, Colwyn Bay, LL29 7LN. Alternatively, you can telephone 01492 530013.

### **Protecting your information**

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us 'Personal Information', we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your 'Personal Information', we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **Profiling**

We may analyse your 'Personal Information' to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external

sources to help us do this effectively. We may also use your 'Personal Information' to detect and reduce fraud and credit risk.

### **Use of 'cookies'**

Like many other websites, the COS website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **18 or Under**

We are concerned to protect the privacy of children aged 18 or under. If you are aged 18 or under, please get your parent/guardian's permission beforehand whenever you provide us with 'Personal Information'.

### **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **How long we keep your Personal Information**

We will only keep your 'Personal Information' for as long as it is required for the purpose we collected it, including if it is needed for any legal, accounting or reporting purposes.

## **Your rights and controlling your 'Personal Information'**

You have the right to:

- Be informed about what we are doing with your 'Personal Information'
- Object to the processing of your 'Personal Information'
- Request access to your 'Personal Information' (commonly known as a "data subject access request")
- Request us to update the 'Personal Information' we hold about you or delete the information we hold about you (although we will not be able to provide our services to you if you make this request)
- Ask us to stop processing 'Personal Information' about you where we are relying on a legitimate interest
- Ask us to restrict how we use your 'Personal Information' for a period of time
- Request us to send another organisation information that you have provided to us in a computer-readable format
- To understand and input into a decision made by solely automated means if it has a legal or similarly significant effect on you
- Withdraw consent if that is the basis that we are relying on. We will inform you how to do this.

### **Erasure**

- To ask that we delete your 'Personal Information'
- If we no longer need your information for the reason we collected it
- If you gave your consent to how we use your information but now wish to withdraw that consent
- If you want to object to our use of your information and we have no overriding legitimate interest to continue
- If we are using your information unlawfully
- If there is a legal requirement to delete the information
- If the information is processed in relation to the offer of online services to a child.

### **Object**

- To object to our use of your 'Personal Information'
- If we are using your information based on our legitimate interests
- If we are using your information to contact you for direct marketing reasons (e.g. fundraising)

### **Restrict processing**

- To limit our use of your 'Personal Information'
- If you think the information we hold about you is inaccurate or incomplete - whilst we check the accuracy and/or update it



- If you object to the processing of your information based on our legitimate interests, while we investigate if we have an overriding legitimate interest
- If we are using your information unlawfully
- If we no longer use the information, but you require us to keep it for any legal claim

### Data Portability

- To request an electronic copy of your 'Personal Information' in a commonly used form eg CSV file
- If you provided us with your information directly for contractual reasons or consented to how we use it, and the processing is carried out by automated means.
- Automated decision making including profiling
- To obtain human involvement - obtain an explanation, input to and challenge the decision
- If we are using your information to make a decision which has a legal or similarly significant effect on you and if it is made by solely automated means (including profiling)

### Further information on your rights

If you are unhappy with how we handle your 'Personal Information', or how we handle any requests you make, please contact our Data Protection Officer.

If our Data Protection Officer cannot address your concern, you can complain to the Information Commissioner's Office: or call 0303 123 1113.

### Review of this Policy

We keep this Policy under regular review. This Policy was last updated 22<sup>nd</sup> February 2020

Signed: .....  
  
 Chair of Trustees

Date: 23/02/2020

Signed: .....  
  
 On behalf of Management Team

Date: 23/02/2020

