

# Throw A Starfish

## Privacy Statement



<b>Approval Body</b>	Trustee Board	<b>Adopted:</b>	10 Dec 2021
<b>Responsible Person:</b>	L Biggs	<b>Review:</b>	
		<b>Revised:</b>	

### Throw A Starfish Privacy Statement

#### Introduction

**Throw A Starfish** is a UK based Christian charity. It is registered as a Charitable Incorporated Organisation in England and Wales with charity number 1180888.

In this statement, “we” and “us”, refer to **Throw A Starfish**.

We value our supporters and those who engage with us, and do all we can to protect your privacy and ensure that any personal data you provide to us is kept safe.

The way that we process personal data is governed by the General Data Protection Regulation.

If you have any questions about this policy, please email [info@ThrowAStarfish.org](mailto:info@ThrowAStarfish.org) or write to: The Data Protection Lead, Throw A Starfish, 16 Longcroft, Braithwaite, Keswick, Cumbria, CA12 5TE

#### Information that we collect directly

We may collect information from you via our website, in person, on the phone, by email or by paper response forms.

When you use our website ([www.ThrowAStarfish.org](http://www.ThrowAStarfish.org)) to donate, request information, or apply to volunteer with us, we will ask you to provide personal information to complete these transactions. The types of personal information you provide to us may include:

- contact information (such as your name, address, telephone number and email address)
- payment and transaction information including credit card information
- contact preferences
- educational and employment background
- information provided to apply to “Throw A Starfish”

examples of the information we collect:

If you sign a Gift Aid form, it includes your name, address and postcode as a requirement of Her Majesty’s Revenue and Customs (HMRC).

If you consent to receiving news and information from us by email, we store your name and email address.

If you consent to receiving news and information from us by post, we store your name and postal address.

#### Children

We will seek permission from a parent or guardian before holding data on children under 18. We will also seek consent from the appropriate adult about how we will communicate with their child(ren) in the future.

## **Volunteering**

We hold personal data provided by applicants during our recruitment process volunteers to Throw Starfish. If you are not successful, we will keep this data on file for 12 months, after which it will be destroyed, unless we communicate otherwise.

## **How Long Will We Keep Your Personal Data?**

We will only keep your data as long as is reasonable and necessary. We will use it for the designated purposes or to fulfil statutory obligations. We will hold financial data for seven years, and legacy and standing order records indefinitely.

## **Information collected indirectly**

When you visit ThrowAStarfish.org our web hosting service collects limited, non-personal, information about you. This includes your IP address and the operating system and type of browser you are using. We have no control over the collection of this information, but are able to view it.

If you make a donation by bank transfer or standing order, details of the transaction are recorded on our bank statements, including the name of your bank account and the amount of the donation. We have no control over the collection of this information, but are able to view it.

## **What we do with the information that we collect**

If you have signed a Gift Aid form, we use that information to claim the Gift Aid from HMRC. We do not share that information with any organisation apart from HMRC.

If you send us a donation, we use information about your donation for accounting purposes. We may contact you about the donation, for example to clarify whether there was any specific purpose for which you had given it. We do not share information about your donations with any organisation apart from HMRC where Gift Aid applies.

If you have consented to receive news, we may send newsletters to tell you about the work of the charity. We may also send occasional updates on the projects, requests for financial support and invitations to events.

If you have applied to "Throw A Starfish" or "Become a partner" we use the information supplied to assess the application.

We may use the information collected by our web hosting service to find out how many people visit our website and which pages they view. We are not able to identify you personally from the information that is collected. We do not collect any personally identifiable data through our website.

## **Basis of processing your data**

One of the legal bases for collecting and using personal data is that you have given consent. Where you ask us to provide something via our website, in person, on the phone, by email or by paper response forms, we will take that as consent.

Another legal basis for collecting and using personal data is that we have a legitimate interest in doing so. If you were contacted by a trustee as part of the process of setting up the charity, we will assume you have an interest in being kept up to date with developments and will continue to hold your data and contact you unless you ask us not to.

You are, of course, free to change your preferences at any time by contacting us by telephone, post or email as shown in the section 'Your choices' below.

Another legal basis for collecting and using personal data is that there is some form of contract which requires us to hold it. This is the case for information about bank transactions and Gift Aid forms.

## **Storing your information**

### **How long?**

We retain your information for only as long as is necessary to carry out the purpose for which we collected it.

Information on donations, with or without Gift Aid, has to be retained for 6 calendar years after your final donation to meet tax and accounting requirements.

If you receive news from us, we will retain your information on our mailing list unless you unsubscribe or tell us that you no longer wish to receive news.

## **Security**

We ensure that your personal data is protected and that access to it is restricted to those trustees or volunteers whose role requires it. Our mailing system is fully encrypted.

Our mailing system is cloud based and may be processed outside the European Economic Area (EEA). We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely. By allowing us to store your contact information you agree to this transfer, storing and processing of your information.

The Internet, however, cannot be guaranteed to be totally secure but, by holding the minimum of data about you, we mitigate this risk as far as we are able.

## **Sharing your information**

Where you have signed a Gift Aid declaration, we have to share your information with HMRC in order to claim the Gift Aid.

Where you provide information as part of volunteering to Throw A Starfish, that information will be shared with the relevant trusted partner.

Apart from that, we do not share your information with any other organisation.

## **Using our website**

We may provide links to third-party websites for your convenience and information. If you access those links, you will leave our website. We do not control those sites or their privacy practices which may differ from our practices. The personal data you choose to provide to, or that is collected by these third parties, is not covered by this privacy statement.

Please note that any information that you post to a public bulletin board, social media site or chat room is accessible to all persons accessing that location. Throw A Starfish is not responsible for any information you elect to submit in these venues or the use of such information.

## **Cookies**

We use Google Analytics to improve our website experience. Google analytics will store a cookie when you visit our website to track your visit. This helps us understand where you found the website, how you navigated and how we can improve our user experience. Information generated and stored is not personally identified, and your IP address is anonymized. For more information about Google Analytics, please visit their privacy page:

<https://support.google.com/analytics/answer/7105316?hl=en>

## **Your choices**

You can change your preferences on what you receive from us or how we contact you. Our contact details are:

Telephone: 0330 229 0482

Email: [admin@ThrowAStarfish.org](mailto:admin@ThrowAStarfish.org)

Address: **Throw A Starfish**, 16 Longcroft, Braithwaite, Keswick, Cumbria, CA12 5TE

You can also unsubscribe from the newsletters if you wish.

## **Access to information**

You have the right to request details of information that we hold about you. To receive a copy of the information that we hold about you, please write to us at the address above. We will respond within one month of receiving your letter.

You can find more information on your rights regarding data protection by visiting the website of the Information Commissioner's Office.