

# Privacy & Cookies Policy

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Reference	Approved by the Board of Trustees on:	Draft/Review date:
IN POL.P&C. 1.0	25 <sup>th</sup> September 2018	September 2020

## **1. Policy Statement**

- 1.1 In Control is committed to protecting your personal data, whether you are a supporter of our cause, or a volunteer. In order to protect your data, please read this policy carefully. This will help you understand how we collect, use and store your personal data.
- 1.2 In Control is a registered UK charity; registration number 1130761. We are also registered with Information Commissioners Office. If you have any questions regarding this policy, please feel free to contact our Data Protection Officer at the following address:

The Data Protection Officer

In Control

Carillon House

Chapel Lane

Wythall

West Midlands

B47 6JX

Fax: 01564 824 260

Email: [admin@in-control.org.uk](mailto:admin@in-control.org.uk)

- 1.3 In drafting this policy, we have taken into account the following legislation, including:
- The Data Protection Act 1998
  - The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
  - Directive 2009/136/EC of 25 November 2009 (“The European Union Cookie Directive”).

## **2. Notification of change of privacy & cookie policy**

- 2.1 We reserve the right to amend this privacy statement at any time. You are advised to visit this website section periodically in order to keep up to date with any changes that may be made in our privacy policy.

### **3. CONSENT**

3.1 By using our website, our social media pages (such as Facebook), subscribing to our services/notifications/marketing materials, donating to us and/or volunteering with us; you agree that we can place the types of cookies set out below on your device and use your data in accordance with this policy.

3.2 In order to remember that you have accepted our use of cookies, we will place a temporary cookie to remember your consent for 3 months.

### **4. PRIVACY POLICY**

#### **4.1 How do we collect information?**

4.1.1 We may collect information about you whenever you interact with us. For example, when you contact In Control regarding our events and activities, register as a donor or volunteer, send or receive information, engage with our social media or make a donation to us, you are specifically and knowingly providing our team with your personal information.

4.1.2 In addition, we collect aggregated or anonymous information about the services you use and how you use them. For example, when you visit our website, view or marketing materials, respond to our adverts and interact with us via social media. We may also receive information about you from third parties – for example, where you've given them permission to share your information or where we gather information from publicly available sources which we discuss below.

#### **4.2 What information do we collect?**

4.2.1 We may collect names, addresses, email addresses and telephone numbers whenever you interact with us. We do not use cookies to collect this type of information.

#### **4.3 How do we use your information?**

4.3.1 We may use your information in a number of ways and for a number of purposes including:

- To provide you with information or services that you have requested from us or that we feel may be of interest to you where you have consented to being contacted;

- To provide you with information about our work or our activities where you have agreed to receive communications from us;
- To invite you to participate in interactive features on our website;
- For administrative purposes (for example, we may contact you regarding an event for which you have registered, to provide information that you have requested from us or respond to an enquiry you have made to us);
- For internal record keeping relating to, feedback, enquiries or even complaints;
- To invite you to participate in voluntary surveys or research;
- To contact you where you have been identified as a contact person for an organisation, such as a local authority or provider (if we obtain your contact details in this way, we will only use them to contact you in your capacity as a representative of that organisation);
- To analyse and improve our website;
- To direct communications to other people who may have similar interests or enquiries yours;
- Where it is required or authorised by law.

4.3.2 In particular, we may contact you for marketing purposes by email or text message if you have specifically provided us with your consent allowing us to contact you in this way. We may also send you acknowledgement communications via email or text, for example where you request services on our website, or you have made an enquiry.

4.3.3 We may send you information about our work by direct mail or telephone unless you have told us that you would prefer not to receive information in this way, only if you have provided us with your postal address or telephone number.

4.3.4 It is up to you to choose how you hear from us. If you express that you do not wish us to use your personal data for marketing purposes as outlined above, please tick the relevant boxes on the forms we use to collect your data, such as our donor forms, website when you make a donation, any of our marketing literature and materials and other direct communication we may have with you face-to-face, via emails or over the telephone.

4.3.5 You can also update or change any of your marketing preferences at any time (including telling us that you don't want us to contact you for marketing purposes) by:

- Indicating that you do not wish to receive our marketing emails by clicking the 'unsubscribe' link in at the end of our marketing emails;

- Asking us to stop sending you marketing texts by sending us an "opt-out" text message, following the instructions we provide you in our initial text; or

Contacting us through by email at Email [admin@in-control.org.uk](mailto:admin@in-control.org.uk)

- By telephone on 01564 821 650,

- By writing to us at:

In Control

Carillon House

Chapel Lane

Wythall

West Midlands

B47 6JX

Fax: 01564 824 260

4.3.6 If you have indicated that you do not wish to be contacted for marketing purposes, we will maintain your details on a suppression list to help ensure that we do not continue to contact you.

## **5 How will we disclose the information we have collected to outside parties?**

5.1 Where you have agreed to receive emails for marketing communications from us, we will never pass on your information to outside parties unless you request us to do so.

5.2 We enter into contracts with all of these service providers that require them to comply with data protection laws and to ensure that they have appropriate controls in place to protect the security of the information you provide.

5.3 We will never sell your details or share your details with third parties.

5.4 We will not make cold telephone calls to members of the general public; therefore, we will not purchase your data in order to do so.

5.5 We may disclose your personal information if we are requested or required to do so by a regulator or law enforcement or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect In Control (for example in cases of suspected fraud or defamation, or in order to comply with any other applicable legal obligation).

## **6. How we protect your personal information?**

- 6.1 At In Control we take the appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date. Also, we only keep your information as long as is reasonable and necessary.
- 6.2 Whilst we use appropriate security measures once we receive your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk. We do not take payment by card (such as visa or credit) through our website.
- 6.3 We may on occasion, need to use the services of a service provider outside the European Economic Area (EEA) for financial and technical reasons. However, any service provide we use to process your information will have to do so in compliance with the European Data Protection Regulations. By submitting your personal information to us, you agree that we may transfer, store or process your data at a location outside the EEA as outlined above. In Control will take all steps reasonably necessary to ensure that your data is processed securely and in accordance with this privacy policy.

## **7. Job and volunteer applicants and current and former employees**

- 7.1 If you apply to work at In Control, we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside of our organisation, for example, if we need a reference, plan to use an external supplier to run background checks or need to get a 'disclosure' from the Disclosure and Barring Service (DBS) - we will make sure we tell you beforehand, unless we are required to disclose this information by law.
- 7.2 If you are unsuccessful in your job application, we will hold your personal information for 6 months only. After this time and only if we have finished recruiting for the post you applied for, then we will destroy or delete your information.

- 7.4 If you are recruited by us and begin employment, we will put together a personnel file about your employment. The information in this file will be kept secure and we will only use it for matters that apply directly to your employment with us at In Control.
- 7.5 When your employment ceases and you leave In Control, we will keep your file according to our record retention guidelines. You can contact us to find out more about this.
- 7.6 If you apply for a job or volunteering opportunity at In Control, we will also collect information so we can assess your suitability for the role.
- 7.7 Please refer to the Data Protection, Privacy and Recruitment Statement for further information.

## **8. Can you gain access to your personal information?**

- 8.1 You are entitled to request a copy of the personal information In Control have in relation to you which is kept on our internal database created and accessed only by the Data Processor at In Control. If you wish to access the information, we may charge an administration fee for processing your request.
- 8.2 You must make a request in writing to the following:
- The Data Protection Officer  
Carillon House  
Chapel Lane  
Wythall  
West Midlands  
B47 6JX  
Email: [admin@in-control.org.uk](mailto:admin@in-control.org.uk)

## **9. How to update my information or change my marketing preferences?**

- 9.1 If you want to update the information In Control hold for you, or you think any information we have about you is incorrect or incomplete, please get in touch as soon as possible. Please email: [admin@in-control.org.uk](mailto:admin@in-control.org.uk) , or telephone 01564 821 650.

Alternatively, you can write to us at:

The Data Protection Officer

Carillon House

Chapel Lane

Wythall

West Midlands

B47 6JX

- 9.2 The same details should be used if you want to remove your details from our marketing mailing lists, or to change your marketing preferences.

## **10. Children's data**

- 10.1 When you register with us, you are stating that you are 18 years of age or over, or are a minor acting with parental consent. By registering, you agree that any information you provide to us about yourself upon registration or at any time is true. Your data will be held as described above.

## **11. Confidentiality**

- 11.1 We cannot be held responsible for the privacy of data collected by websites not owned or managed by In Control, this includes those linked through our website.

## **12. Emails terms of use**

- 12.1 Emails aren't always secure, and they may be intercepted or changed after they've been sent. In Control as an organisation do not accept any liability if this happens. The contents of emails exchanged reflect their author's views and not necessarily those of In Control.

- 12.2 We would ask that you do not send In Control any financial data through email. The information in emails is confidential, so if you've received one by mistake, please delete it without copying, using, or telling anyone about its contents.

## **13. COOKIES POLICY**

### **Statement**

13.1 In Control uses “Cookies” on our website, as almost all websites do; in order to help us to provide you with the best experience we can.

## **14 What are Cookies?**

14.1 Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. They are then sent back to the originating website (In Control) on each subsequent visit, or to another website that recognises that cookie.

14.2 Cookies are useful because they allow a website to recognise a user’s device. It enables In Control to collect and process the information you have provided to us in the way that you have intended (as described in the Privacy Policy above).

## **15. Categories of Cookies we use**

15.1 Cookies may be either 'session cookies' or 'persistent cookies'. Your computer automatically removes session cookies once you close your browser. Persistent cookies will survive on your computer until an expiry date specified in the cookie itself, is reached. We use both session and persistent cookies.

15.2 We also use the following type of Cookies:

- **Strictly necessary cookies:** These cookies are essential for the user to move around the website and to use its features;
- **Performance cookies:** These cookies collect information about how the user makes use of the site, e.g. which pages the user visits most. These cookies do not collect information that identifies the user.
- **Functionality cookies:** These cookies remember choices made by the user and enhance the features, e.g. language or users location. This cookie is also used to remember a user's preferences for a font size, or customisable parts of a web page.

## **16 What information do we collect?**

16.1 We may collect some, or all, of this information when you visit our website, depending on how you use it. We monitor how people use our website so we can improve it. We collect this information anonymously. However, you can use our website anonymously without giving us any information. If you visit our website, we may record information about including (but not limited to):

- the areas of the website you visit
- the amount of time you spend on the site
- whether you are new to the site, or have visited it before
- how you came to our website – for example, through an email link or a search engine
- the type of device and browser you use.
- how you use the website and the quality of your experience – for example we may track your bandwidth when viewing videos.

## **17. What we do**

17.1 We use cookies to track how donors come to our site. For example, we use approach codes in our internet addresses (URLs) to show us where a donation came from and give us insight into the effectiveness of our marketing material. Some of this will be used by third party cookies to target you with relevant advertising (see below).

17.2 Although not through cookies, we do measure the success of the emails we send – so we know what subject lines and stories people liked the most. We receive this information anonymously, we don't share this information.

17.3 We do not use Cookies to:

- collect any personally identifiable information (without your express permission);
- collect any sensitive information (without your express permission);
- pass your data onto advertising networks;
- pass personally identifiable data to third parties;
- pay sales commissions.

## **18. Do you have to consent to the use of Cookies?**

- 18.1 Most web browsers automatically accept cookies, but if you prefer, you should be able to change your browser to prevent that. You should read the information that came with your browser software to see how you can set up your browser to notify you when you receive a Cookie. This should then give you the opportunity to decide whether to accept it. However, you may not be able to take full advantage of a website if you do so.
- 18.2 Please note that Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. If you do not change your browser settings and continue to use our websites, The Charity will infer that you have consented to us using cookies for the purposes set out below.
- 18.3 There is no way to prevent these cookies being sent other than to not use our site.

## **19. Turning Cookies Off**

- 19.1 You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies (Learn how [here](#)). Doing so however will likely limit the functionality of our's and a large proportion of the world's websites as cookies are a standard part of most modern websites.

## **20. Anonymous Visitor Statistics Cookies**

- 20.1 We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at etc. This helps us to continuously improve our website. These so called analytics programs also tell us if , on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before helping us to put more money into developing our services for you instead of marketing spend.