

GIRLGUIDING NORFOLK COUNTY PRIVACY NOTICE

(including Patteson Lodge Activity Centre
and the Archive Resource Centre)



What is a privacy notice?

Our privacy notice sets out how Girlguiding Norfolk County* gathers, uses, discloses and manages your data. Here at Girlguiding Norfolk County we take your privacy very seriously.

We regularly check this notice to ensure we provide you with the most up-to-date information regarding our data processing activities. We strongly advise you to read this page from time to time to ensure you are happy with any changes that might be made.

This privacy notice has been prepared to be as comprehensive as possible, but it does not include an exhaustive list of every aspect of our collection and use of personal information. However, we would be happy to provide any further information or explanation about our practices.

If you have any questions about this notice, please contact us using the details in the 'Get in touch' section below.

* Who 'Girlguiding Norfolk County', 'we' or 'us' are:

'Girlguiding Norfolk County', 'us', 'we' or 'our' refers to the registered charity **Norfolk Guide Association**, Charity Number 280532.

Registered / Head Office address:
14 Great Hautbois Road
Coltishall
Norwich
Norfolk NR12 7JN

When referring to our website, we include www.girlguidingnorfolk.org.uk and www.pattesonlodge.org.uk

[Patteson Lodge Activity Centre and Archive Resource Centre are also located at the address above.]

What personal information do we collect and how?

We collect the following personal information:

- your name
- your parents'/guardian's name if you are aged 14 or younger
- contact details (including your postal address, telephone number(s) and email address)
- your date of birth
- your payment details (bank and/or credit card details) (if you donate to us or make any other payment including to our online shop)
- records of your correspondence and engagement with us
- records of your participation with us (including as a member or as a volunteer)
- donation history and Gift Aid details
- information you may enter into our website

- photographs, video or audio recordings
- biographical information
- any other information you share with us.

This information may be collected via:

- information you fill out on the website, including via GO (our volunteer platform)
- telephone conversations or face to face interactions with you (and/or your parent/guardian)
- local Girlguiding groups
- digital forms on our website, online surveys or emails
- third party companies and websites such as Just Giving, Virgin Money Giving and Committed Giving.
- publicly available sources (like Companies House or the Charity Commission website); and
- communication via social media.

We sometimes also collect sensitive personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. For example, we may make a record that a person is in a vulnerable circumstance in order to comply with requirements under charity law and the Code of Fundraising Practice to ensure that we do not send fundraising communications to them.

Why and how do we use your personal data?

We will use your personal information to:

- manage your participation as a volunteer with us, including updates to national Girlguiding policies and procedures, providing volunteer care and support, and equal opportunities monitoring
- administer your participation in guiding activities, and to make sure that there is appropriate care in place for these activities
- administer your engagement with us, including communicating with you about membership details and arranging payment or bookings
- process your donation and claim Gift Aid (if applicable)
- manage your engagement with fundraising
- develop and deliver the services that we offer you
- keep a record of your relationship with Girlguiding Norfolk County, for internal administrative purposes, and to let you know about changes to our services or policies
- investigate and respond to complaints, legal claims or other issues
- fulfil customer orders for goods from our online shop, including processing payments
- meet obligations under consumer protection law
- carry out statistical analysis and research to improve our services, communications and fulfilment of our charitable objectives
- prevent and detect fraud and error
- assess applications for volunteering and employment opportunities
- manage risks so that our members can enjoy guiding in a safe environment

- keep you up to date with our fundraising, marketing and campaign activity through our website, direct mail, SMS/text campaigns, email and telephone (see below for further detail).

If you post content on social media and share these posts to our social media channels we may ask for your permission to use your content. We do this under our legitimate interests of engaging with those who support us publicly.

We may use your personal data to give you information about our work, services, events or products which we think may be of interest to you, for example::

- updates about Girlguiding Norfolk County work - including newsletters, magazines and other publications
- appeals and fundraising activities - including requests for donations, information about legacy gifts, how you can raise money on our behalf or attend or take part in a fundraising event and updates about the impact that fundraising activities have had on our work.
- information about events that Girlguiding Norfolk County organises or participates in
- volunteering - information about how you can help support Girlguiding Norfolk County by giving your time or using your influence to progress our aims, along with updates about the impact of your work.

We only send this information to you if we have your prior consent. You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the 'Get in touch' section below.

If you make any changes to your consent, we will update your record as soon as we possibly can. It may take up to 60 working days for our systems to update and stop any postal communications from being sent to you. E-mail communications will however be stopped immediately. If you tell us you do not wish to receive marketing, fundraising or campaign communications, you may still receive transactional and service-based communications confirming and servicing other relationships you have with us (as described below).

We may also analyse your personal information to create a profile of your interests and preferences. This allows us to ensure communications are relevant and timely and provide an improved experience for our supporters. It also helps us understand the background of our supporters so that we can make appropriate requests to those who may be willing and able to give more than they already do, enabling us to raise funds sooner and more cost-effectively.

When building such a profile, we may make use of additional information about you, including geo-demographic information. This information is taken from publicly available sources, for example from public registers, such as listed directorships, typical earnings in a geographical area, information from the electoral roll, press reports and social media posts.

Legal bases for processing your personal information

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that Girlguiding Norfolk County carries out. This includes information that is processed on the basis of:

- a person's consent (for example to send you direct marketing by e-mail or SMS)
- a contractual relationship (for example to provide you with goods or services that you have purchased from us)
- processing that is necessary for compliance with a legal obligation (for example to process a Gift Aid declaration and carrying out due diligence on large donations)
- Girlguiding Norfolk County's legitimate interests (please see below for more information).

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and consistent and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Girlguiding Norfolk County's legitimate interests include:

- Charity governance, including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes.
- Administration and operational management, including responding to solicited enquiries, providing information and Girlguiding Norfolk County services, research, events management, the administration of volunteers and employment and recruitment requirements. This includes the sharing of information with regional and local branches of Girlguiding.
- Fundraising and campaigning, including administering campaigns and donations, and sending direct marketing by post (and in some cases making marketing calls), sending thank you letters, analysis, targeting and segmentation to develop communication strategies and maintaining communication suppressions.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please get in touch with us using the details in the 'Get in touch' section below.

If you are aged 14 or younger

If you are under the age of 14, you must obtain permission from your parent or guardian before registering or providing any personal information to us.

How long do we keep your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

Do we share your data with other organisations?

We do not share or sell your personal information to third-party organisations for marketing, fundraising or campaigning purposes.

We may share your personal information with relevant regional and local Girlguiding organisations to:

- administer your membership of Girlguiding
- facilitate your participation in Girlguiding events, activities and learning opportunities
- conduct market research so we can improve our offerings to you and as an organisation overall.

We will share your personal information with an international affiliate of Girlguiding if you express an interest in joining that international affiliate.

We share personal information:

- with data processors, who carry out data processing operations on our behalf, for example our website providers if you register for our members' area
- where we are required to do so by law, for example to law enforcement or regulatory bodies
- where we think it is in the best interests of Girlguiding Norfolk County or a third party to make a disclosure, and where we are satisfied that a disclosure does not put us in breach of data protection law.
- where it is necessary to protect the vital interests of an individual or
- if we have obtained your consent.

We may use third-party suppliers to manage mailings for fundraising appeals, challenge events, campaigns, conduct research surveys or store your personal information on our behalf. You can find out more about the suppliers that we use by getting in touch with us using the details in the 'Get in touch' section below.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from Girlguiding Norfolk County and in accordance with a data processing agreement entered into between Girlguiding Norfolk County and the supplier.

How we protect your personal information

We use appropriate technical and organisational measures and precautions in order to protect your personal data and to prevent the loss, misuse or alteration of your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The personal information that we request is only used by us to fulfil your order or process your donation.

The personal information that is required for our accounts is kept securely and only for as long as required by law.

The information we collect from you may be transferred to and processed and/or stored at a destination outside the European Economic Area ('EEA'). If we send your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your information.

Cookies and digital marketing

Cookies are small text files placed on your computer by websites that you visit. They are widely used to make websites work more efficiently for visitors, and to provide information to the owners of the site.

We use cookies to track the server (we use multiple servers) you are communicating with in order to present a consistent user experience and remember information about the data you have entered. This cookie does not identify you personally and is not linked to any other information we store about you.

By continuing to use our websites, you agree to our use of cookies. Please visit our 'cookies' page for more information on the exact cookies that we use.

Remarketing

The Girlguiding Norfolk County website may share your personal data with remarketing services, including Facebook, Google Adwords and Google Analytics, to serve our adverts to you on third party websites. Third-party vendors, including Facebook and Google, use cookies to serve ads based on someone's past visits to the Girlguiding Norfolk County website. Please visit our cookies page for further information.

Disclaimer

We cannot be responsible for any information you disclose in public community areas of the Girlguiding Norfolk County websites or on websites that we link to from our platforms. This information can be viewed or collected by any third party and you should always be wary of publishing any personal information in public community areas.

We also encourage you to read the privacy notices of any other websites that we link to from Girlguiding Norfolk County websites which you choose to visit so you may understand what information is collected from you and for what purpose.

Girlguiding Norfolk County cannot be held responsible for the policies of any third-party website that we link to and you access these websites at your own risk.

Your rights

You have the following rights:

Right of access

- You have the right to know what information we hold about you and to ask, in writing, to see your records.
- We will supply any information you ask for that we hold about you, subject to any exemptions that apply, as soon as possible, but this may take up to 30 working days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.
- This is called a data subject access request and can be made via the details set out in the 'Get in touch' section below.

Right to be informed

- You have the right to be informed how your personal data will be used. This notice as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

Right to withdraw consent

- Where we process your data on the basis of your consent (for example, to send you marketing texts or e-mails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Get in touch' section below.

Right to object

- You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post or use your information for statistical purposes). To do this, or to discuss this right further with us, please contact us using the details in the 'Get in touch' section below.

Right to restrict processing

- In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right of erasure

- In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

Right of rectification

- If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us using the details in the 'Get in touch' section below.

Right to data portability

- To the extent required by data protection law, where we are processing your personal data because you have given us your consent to do so, or where it is necessary for a contract to which you are a party, if the processing is automated you can ask for the data to be provided to you, or another service provider, in a machine-readable format.

Please contact the Girlguiding Norfolk County Commissioner (ggnadmin@girlguidingnorfolk.org.uk) if you wish to exercise any of the above rights. If you make a request relating to any of the rights listed above, we will consider each request in accordance with all applicable data protection laws and regulations.

Get in touch

If you have any concerns about the Girlguiding Norfolk County privacy notice or feel that we are not adhering to the provisions set out here, please do not hesitate to contact us by writing to:

Girlguiding Norfolk County Commissioner
14 Great Hautbois Road
Coltishall
Norwich
Norfolk NR12 7JN
Email: ggnadmin@girlguidingnorfolk.org.uk

If you have any complaints about the way in which Girlguiding Norfolk County has used your data please get in touch with us using the details in this 'Get in touch' section. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the Information Commissioner's Office (www.ico.org.uk) and the Fundraising Regulator (www.fundraisingpreference.org.uk).

Changes to this privacy notice

This privacy notice may change from time to time. Please visit the privacy note section at www.girlguidingnorfolk.org.uk periodically in order to keep up to date with the changes in our privacy notice.