



FOOD BANK AID

Privacy Policy (Policy 1.1)

1. About us

Food Bank Aid is a registered charity (Charity Number 1194314) (**Food Bank Aid**) set up in 2021. We are also a company limited by guarantee (company number 13299257). Our registered address is Food Bank Aid, 2b Chaplin Square, Gt North Leisure Park, London N12 0GL

For the purpose of the UK General Data Protection Regulation (**UK GDPR**), the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) which now forms part of UK law, and the Data Protection Act 2018 (together the **Data Protection Laws**), Food Bank Aid is the "**Data Controller**" of the "**Personal Data**" referred to in this policy.

As a Data Controller, Food Bank Aid determines when, why and how to process Personal Data, being information identifying a living, identified or identifiable individual i.e. a "**Data Subject**".

"**Processing**" includes any activity involving the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Food Bank Aid commits to protecting your personal data, whether you are a financial supporter, donor, volunteer, employee, contractor, partner or campaigner. This Privacy Policy sets out how and why we obtain, use and protect personal information if you interact with us in one of these ways.

This policy does not form part of any contract and we reserve the right to amend it at any time.

2. Our Purpose

The objects of Food Bank Aid are for the public benefit and specifically restricted to the relief of poverty, especially food poverty, by means including the collection, sorting and distribution of food and other supplies to food banks that serve the needs of persons who are or in danger of suffering food poverty. Food Bank Aid also creates connections between the different food banks to improve efficiencies. Our employees, contractors, volunteers and supporters help us to achieve this in a variety of ways, by:

- Fundraising, donating money and donating food and food supplies to support our programme of work;

- Working or volunteering at Food Bank Aid and supporting our activities in the community;
- Campaigning for change.

We take active steps to make sure that our supporters are aware of the ways in which they can help us achieve our overall purpose.

3. About this policy

This Privacy Policy applies to all Personal Data that Food Bank Aid may collect and process about you, whether you are a donor, employee, volunteer, supplier or anyone else we may interact with. We are committed to protecting and respecting your privacy and will do so in accordance with the Data Protection Laws. This policy sets out the types of Personal Data we may hold about you or a Data Subject, how and why we collect it, how we use it, and how we keep it secure. Please read this policy carefully to understand how we will process your Personal Data.

4. What Personal Data we collect

Food Bank Aid will only collect the information that we need to carry out and promote Food Bank Aid's charitable activities. Typically, this may include the following information (though this list is not exhaustive):

- Personal contact details including name, address, email address and telephone number;
- Date of birth, gender, marital status and any dependants;
- Bank account details, payroll records, tax status and national insurance number;
- Information relating to attendance at, and interest in, Food Bank Aid events;
- Any information relating to donations an individual may have made to Food Bank Aid;
- Any other information an individual completion of one of our forms;
- We may take photographs of individuals who attend any Food Bank Aid events.

5. How we collect your Personal Data

Food Bank Aid may collect Personal Data in the following ways:

- When an individual provides it to us, including by filling in forms or by corresponding with us by post, phone, email, social media or otherwise;
- When it is provided to us by third parties;
- When an individual makes a financial donation;
- From publicly available sources;
- When a supplier provides services to us.

6. Why we Process Personal Data

There are a number of different legal grounds for Processing Personal Data. Which one is applicable will depend on how we are Processing the Personal Data and for what purpose. Most commonly Food Bank Aid will Process Personal Data in the following circumstances:

- Where it is necessary to pursue Food Bank Aid's legitimate interests as a charity (or those of a third party) and the Data Subject's interests and fundamental rights do not override Food Bank Aid's interests. Our legitimate interests include providing an effective service, promoting the charity and its events, keeping our records updated and carrying out our administrative and operational functions;
- To enable Food Bank Aid to perform a contract it is about to enter into or has entered into with you or a Data Subject;
- To comply with Food Bank Aid's legal obligations;
- Because you have consented to the Processing that we are carrying out. If we are relying on your consent to Process your Personal Data, you may withdraw that consent at any time.

We have provided some examples of when we will Process Personal Data in practice, as follows:

- To make a decision about recruitment or appointment and to check an individual is legally entitled to work in the UK;
- To determine the terms on which an individual works for us;
- To make decisions regarding an individual's employment, if relevant, including the provision of benefits and pension, to manage sickness absence, and to make any decision about terminating that employment;
- To pay an individual, and to deduct any tax and national insurance contributions;
- To keep a record of donations made and actions taken by our supporters and our communications with them;
- To send our supporters information about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to;
- To support volunteers;
- To record campaigning actions by supporters;
- To support community- based fundraising and campaigning;
- To claim gift aid on donations;
- To keep people safe, whether they are visitors to premises, volunteers, staff or participants in events;
- To comply with legal obligations;
- To manage our organisation;
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted.

7. Sharing Personal Data

We will only use your Personal Data for the purposes for which it was obtained and in accordance with this policy. We will not share or sell your Personal Data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

When employees or volunteers leave Food Bank Aid, we may Process their Personal Data to respond to requests for employment references.

We may share your personal information for any of the following purposes described in this policy: to comply with legal requests where disclosure is required or permitted by law (for example to government bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law), other government agencies (including The Charity Commission) or third parties if we are required by law to do so; our professional advisors, agents, contractors or service providers; other business entities should we plan to merge with or be acquired by that business entity, or if we undergo a re-organisation with that entity.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to Process your personal data for specified purposes and in accordance with our instructions.

We may post photographs and videos of you attending Food Bank Aid on social media

8. Transferring your Personal Data outside the UK

Where we transfer your Personal Data to countries outside the UK, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the Personal Data concerned. This can be done in a number of different ways, for example, the country to which we send the Personal Data may have been assessed by the UK as providing an “adequate” level of protection for Personal Data, or, the recipient may have signed a contract based on standard contractual clauses approved for use in the UK. In other circumstances, the law may permit us to otherwise transfer your Personal Data to countries outside the UK.

9. Your Rights

Under the Data Protection Laws, and subject to some exemptions, as the Data Subject you have the right to request access to, correct, erase, or restrict the processing transfer or the deletion, of your Personal Data. If you wish to exercise these rights, please contact the Chair of the Board of Trustees in writing.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of

employment law. In limited circumstances, we may approach you for your written consent to allow us to Process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

You may also have the right to object to us Processing your Personal Data. If you have any questions about this Privacy Policy, including if you would like to exercise any of these rights, please contact Food

Bank Aid via email at info@foodbankaid.org.uk or for more information see the Information Commissioner's website: <https://ico.org.uk/>. If you have any concerns about our use of your Personal Data, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.

10. Unsubscribing from our mailing list

You can unsubscribe from our mailing list at any time by emailing us at info@foodbankaid.org.uk or by following the unsubscribe link in one of our emails. We will action any opt out requests as soon as practicable.

11. How long will we keep your Personal Data?

We will only keep the Personal Data we collect about you only for as long as necessary for the purposes for which it was collected or as required to comply with any legal or reporting obligations to which we are subject.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Where you contribute material to us, e.g., user generated content or in response to a particular campaign, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

12. Security

To prevent unauthorised access or disclosure and accidental loss, destruction or damage we have put in place suitable procedures to safeguard and secure the information we collect and store about you.

We use external companies, such as service providers, to collect or Process Personal Data on our behalf. We complete comprehensive checks on these companies before we work with them and ensure they have agreed to comply with the required data security standards, policies and procedures and have adequate security measures in place. We will put a contract in place with each third party that contains UK GDPR-approved third party clauses explaining how the third party will manage the Personal Data they collect on our behalf or have access to. We have a robust partner monitoring framework to ensure these contractual obligations are met.

These organisations, which are also "**Data Processors**", also have legal obligations under UK GDPR for the way in which your Personal Data is used.

We will maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:

- Confidentiality: only people who have a need to know and are authorised to use the Personal Data can access it;
- Integrity: Personal Data is accurate and suitable for the purpose for which it is processed; and
- Availability: authorised users are able to access the Personal Data when they need it for authorised purposes.

If you know or suspect that an act or omission has occurred that compromises the security, confidentiality, integrity or availability of Personal Data or the safeguards Food Bank Aid has in place, do not attempt to investigate the matter yourself. Immediately contact the CEO/Chair of Trustees or a member of staff who will inform the CEO/Chair of Trustees. You should preserve all evidence relating to any such potential breach.

13. Changes to this policy and your duty to inform us of changes

We keep this Policy under regular review. Any changes we make to our Privacy Policy in the future will be posted on our intranet and, where appropriate, notified to you by email. Please refer to this policy frequently to review any updates or changes.

It is important that the Personal Data we hold about you is accurate and current, it must be corrected or deleted without delay when inaccurate. Please keep us informed if your Personal Data changes during your relationship with us.