

# Policy

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## Privacy and data protection



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## Introduction

### 1.1 SensationALL

SensationALL is an independent Scottish Charity that provides multi-sensory experiences for children and adults with multiple support needs.

SensationALL is called such because we fundamentally believe that individuals with Multiple Support Needs (MSN) and their families should be able to access appropriate services without it being based on diagnostic labels, age or location. There is no requirement for formal diagnosis to use our services.

### 1.2 Policy Summary

This policy outlines SensationALL's approach to privacy and data protection.

### 1.3 Scope

This policy applies to all employed SensationALL staff, volunteers, supporters and job applicants.

## 2.0 Statements

This policy sets out how SensationALL uses and protects your personal information, including data from your use of our website.

SensationALL is the Data Controller for personal data about supporters, event attendees, grant applicants, volunteers and newsletter subscribers. For the purpose of this document we will use the group term 'supporters' to describe any one of these groups. Our ICO registration number is ZA154523.

We do not trade personal data for commercial purposes and will only disclose it if required by law, if it is necessary to arrange your event attendance, or if it is with your consent. SensationALL uses providers based in the European Economic Area to process supporter data.

This policy was updated in April 2018 to show that we are adhering to the new General Data Protection Regulation (GDPR), which comes into force in May 2018.

Use the Contact Us form for any data protection queries.

### 2.1 Email Subscribers

If you subscribe to our mailing list, you will be automatically subscribed to receive email updates. You will only receive information that you have opted in to receive.

Depending on your preferences, we will contact you for the following reasons:

- SensationALL updates, campaigns and events

We use Mailchimp to manage our email marketing. Mailchimp store their data in the US although they comply with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework. They do share data with third parties. We are in the process of moving to a UK-hosted email service who will secure, and keep private all data.

You can change your email marketing preferences at any time, by clicking 'unsubscribe' on any of our emails or by contacting: [info@sensationALL.org.uk](mailto:info@sensationALL.org.uk)

### 2.2 Survey Responders

If you take part in a survey run by SensationALL privacy policies for the relevant form platform will be shown on the survey.

We will only re-contact you following a survey if you have expressed consent.

### 2.3 Donors, Volunteers and Fundraisers

In order to communicate with you, we will collect the following types of information:

- Name, title/s, name of business/organisation and full postal address
- Contact details such as email addresses and telephone numbers
- Information relating to events you may organise such as the event date, the donation collection method, records of the money raised
- How you heard about us
- Your feedback from our services or dealings with us

How much of this information we collect depends on the type of relationship you have and the information we build in the course of your relationship with us. We do not store sensitive personal information that you share with us unless there is a clear and valid reason for doing so. We will use your information to:

- Provide you with the services or information you asked for
- Administer your contact details and give you the opportunity to change your preferences as well as amend errors and update your data
- Manage donations
- Support your fundraising activities
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services or information
- Screen and analyse our supporters against a demographic database for the purpose of segmentation, so that we can efficiently and cost-effectively fundraise, and ensure the most suitable level of marketing is carried out across our entire supporter base
- Flag your data record– for example if you request to be removed from certain mailing lists, opt out of any specific data processing, or if you have special requirements
- Conduct surveys so that we can be sure our customer care and services are maintained to a high standard

We need to keep the details of financial transactions for 7 years after the financial year of a donors last gift, in the event of a tax or banking enquiry. We will only contact you to thank you. If you say that you would like to hear from us, you will be added to our email subscriber list and will receive regular updates and fundraising asks. You can change your preferences on these updates at any time.

## 2.4 Contact Form Users

If you get in touch with us via the contact form on the website, we may save the details you share with us on our database. This way, if you get in touch with you in future we can refer to our previous conversations. We will not contact you or share your details without asking for your consent

## 2.5 Website visitors

We use Google Analytics (GA) to track site user interaction. We have GA code installed on our site which creates one or more text files on your computer (called a "cookie"). The cookies contain an ID number which is used to uniquely identify your browser and track each site you visit that has GA enabled.

We use this data to determine the number of people using our site and to better understand how they find and use our web pages. With this information we can continually improve the information that we provide on our site and the processes for actions such as contacting us and donating. We can also use it to increase the number of new people finding our site.

Google analytics stores the following data:

- Time of visit, pages visited, and time spent on each page of the webpages



- Interactions with site-specific widgets
- Referring site details (such as the URL a user came through to arrive at this site)
- Type of web browser
- Type of operating system (OS)
- Flash version, JavaScript support, screen resolution, and screen color processing ability
- Network location and IP address
- Document downloads
- Clicks on links leading to external websites
- Errors when users fill out forms
- Clicks on videos
- Scroll depth

Google also collects information about you from its Doubleclick tracking and profiling service, from ad-supported apps on your Android or iOS device, from your YouTube and Gmail activity and from your Google account. This data is put together and used to make inferences about your age, gender, interests, hobbies, shopping habits and living circumstances.

## Your rights

If you already have GA cookies, they will be updated with the latest information about your visit to the site.

As we cannot access any personal data about you ourselves, we are not the Data Controller for your Google Analytics or Doubleclick profile data. You would need to contact Google directly for this information.

You have the right to object to this tracking and to stop it happening.

If you would like more detail about the methods used however, please get in touch at [info@sensationall.org.uk](mailto:info@sensationall.org.uk).

How do I prevent being tracked by Google Analytics?

If you are uncomfortable with this tracking, you can take the following actions:

- Use a tracking-blocker, such as Privacy Badger
- Clear cookies after every browsing session
- Install the Google Analytics opt-out extension

## 2.6 Facebook users

You may come across SensationALL naturally on Facebook through your own networks, or you may be presented with an ad from us. We target ads at audiences that look like they have an interest in inclusive support for unique individuals. We do this to inform, educate and engage new potential supporters.

Facebook is a hugely valuable tool for us and for the community that we serve, which is why we use the platform. Facebook however is a commercial company. We want to remind our users that formation that shared on timelines, on our page or in private messages may be used or sold by Facebook for commercial purposes.

## 2.7 Event attendees

When you attend a SensationALL event, we will need your name, email address and in some cases your payment information. We will use this information solely for the purpose of administering the event. We delete event attendance data at the end of every year.

## 2.8 Employees and job applicants

If you apply to work at SensationALL, 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 SensationALL - for example, if we need a reference, or need to get a 'disclosure' from the Criminal Records Bureau - we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we will hold your personal information for 12 months after we've finished recruiting the post you applied for. After this date we will destroy or delete your information.

If you begin employment with us, we will put together a file about your employment. We keep the information in this file secure and will only use it for matters that apply directly to your employment.

Once you stop working for us, we will keep this file according to our record retention guidelines. You can contact us to find out more about this.



### 3.0 Your Rights

As an individual whose personal data is processed by SensationALL you have the following rights:

- the right to be informed – which is what this privacy notice is for
- the right to access the data we hold about you the right to object to direct marketing – either use the 'unsubscribe' button on our emails or contact us directly
- the right to object to processing carried out on the basis of legitimate interests
- the right to erasure (in some circumstances)
- the right of data portability
- the right to have your data rectified if its inaccurate
- the right to have your data restricted or blocked from processing

If you are not happy with the way we have handled your data, and are unable to resolve the issue with us personally, you can complain to the [ICO](#).

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