

## **PRIVACY POLICY**

At VICTA, we're committed to protecting and respecting your privacy.

This Privacy Policy explains what information VICTA collects about you and how it is be used. VICTA promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

If you have any queries regarding this Privacy Policy please contact the Data Protection Lead by email at [admin@victa.org.uk](mailto:admin@victa.org.uk) or write to VICTA, 5 Douglas House, 32-34 Simpson Road, Milton Keynes, MK1 1BA.

### **WHO ARE WE?**

Founded in 1987, VICTA is a UK based charity whose mission is to empower children and young people who are blind or partially sighted and their families. We work hard to help our young people question limiting presumptions they might have, helping them to view themselves and their potential in a new way.

Our registered charity number is 1065029.

### **WHAT THIS PRIVACY POLICY COVERS**

VICTA is committed to protecting your privacy in accordance with its obligations under data protection legislation. The current data protection law is found in the Data Protection Act 1998 but with effect from 25th May 2018, the main data protection law became the General Data Protection Regulation as supplemented by the Data Protection Act 2018 and related laws.

### **WHAT INFORMATION DO WE COLLECT AND HOW DO WE USE IT?**

The type of personal information we collect about you depends on the purpose of collecting the information.

#### ***Information requests***

We use contact information from web forms, emails, mail and telephone to send you information or materials that you have requested, to provide you a service, arrange your place on an activity or deliver a grant. Your contact information is also used to contact you when necessary, for example, to fulfil a query.

#### ***Applying for a service or an activity***

We will collect data about you, both personal data (such as your name and contact details) and also sensitive personal data (such as information about your mobility requirements and health). The personal data and sensitive personal data will be stored, processed and used in the following ways:

- Providing and administering our services and activities
- Monitoring the quality of services and activities provided
- To answer your questions and enquiries
- To use your information on an anonymised basis to monitor our performance

#### ***Users 17 and under***

On some occasions we may collect and manage data of under 18's. We will always aim to manage this data in a way which is appropriate to the age of the child and only keep this data for the purpose in which it was collected. Children's data is usually only collected if a child takes part in one of our activities or applies for a grant.

We will always try to seek consent from the parent or guardian of the child before collecting and processing this information. In the event that we learn we have collected personal information from anybody aged 17 or under and do not have the consent of a parent or guardian, we will delete that information as quickly as possible.

### **Orders, donations and activity payments**

Any orders, donations and activity payments you make require personal and financial information. We will collect your contact information (such as contact details) and financial information (such as account numbers).

Contact information and financial information from the order, donation forms or enquiries are used to fulfil orders, provide services or deliver activities. Your contact information is also used to get in touch with you when necessary, for example to be able to fulfil an order. Financial information that is collected is held securely and deleted on an ongoing basis (credit card details are not stored).

We will not sell or exchange your details with other organisations other than where we have a duty to share your information with third parties, regulatory or law enforcement agencies if we believe in good faith that we are required by law to disclose it in connection with the detection of crime, the collection of taxes or duties, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings.

### **Applying for a job or volunteering position with VICTA**

We will collect data about you, both personal data (such as your name and contact details) and also sensitive personal data (including information in your CV or about health related issues). The personal data and sensitive personal data will be stored, processed, used and disclosed by us in the following ways:

- To facilitate the recruitment process
- To answer your questions and enquiries
- To third parties where we have retained them to provide services that we, you or our client have requested including references, qualifications and criminal reference checking services, and verification of the details you have provided from a third party source
- To use your information on an anonymised basis to monitor compliance with our equal opportunities policy

### **Your consent**

By providing us with your personal data, including sensitive personal data such as on your health, you consent to the collection and use of this information in accordance with the purposes described above and this privacy statement, and you agree to allow us to share your details with other organisations that may fulfil your order or query on our behalf.

## **YOUR INFORMATION AND OUR MARKETING APPROACH**

### **Direct marketing - email marketing**

We will only contact you by email if you actively consent to this, unless we believe there is a legitimate interest to contact you. By consenting to VICTA emails or opting in to email communications, you grant us permission to use your email address to send you email marketing communication. At any stage you may choose to opt out of such communications, please see section entitled **Your Choice** below.

### **Direct marketing – text or telephone marketing**

We will never contact you by text or telephone for marketing purposes.

### **Direct marketing – postal marketing**

If you have provided us with your postal address, we may contact you by post about our work, unless you have told us that you don't want to receive this. Before sending such letters, we will always screen against the Mail Preference Service. Where you are registered with the Mail Preference Service, we will only write to you if you have specifically consented to receiving letters from VICTA.

### **Information collected automatically through our website**

In this privacy policy, where we talk about websites we are referring to websites owned by VICTA:

- victa.org.uk
- throughscarlettseyes.com

### **Google Analytics**

We use Google Analytics to help us understand how visitors are using and engaging with our website. This allows us to make improvements to our web services and your online experience.

The Google Analytics tracking tool uses a number of cookies to collect information and report website usage statistics and does so without personally identifying individual visitors to VICTA. The information generated by the cookie about your use of the VICTA website will be transmitted and stored by Google on servers in the United States. For more information about Google's privacy policy in regards to Google Analytics, please see [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html)

If you wish to opt-out of Google Analytics tracking please visit and install the Google Analytics Opt-out Browser Add-on here: <https://tools.google.com/dlpage/gaoptout/>

### **Cookies**

The website uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve the site. No personal information is stored. Examples of how we may use cookies include:

- recognising your computer to avoid having to give the same information several times
- recognising previous usernames and passwords
- recording numbers of visitors to our website

If you do not want to accept cookies, your browser can be set to automatically reject them or to inform you every time a website asks to store a cookie. You can also delete previously stored cookies.

You can find out more about cookies and how to manage them on the Government website:

<https://www.gov.uk/help/cookies>

### **Using Social Media**

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

### **WHO HAS ACCESS TO YOUR INFORMATION?**

VICTA will not sell your data. We will not share your data with third parties for marketing purposes.

#### ***Third Party Service Providers working on our behalf***

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services/activities to you on our behalf (for example to fulfil grant awards). However, when we use third-party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties beyond the VICTA network for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

#### ***Legal basis for processing your personal data***

In some circumstances we will collect and process your personal information using the legitimate interest legal processing basis.

Sometimes, we will need to process your data as it is part of a contract which you have entered into. For instance, if you have booked an event or registered to run the London Marathon for us, then we will need to contact you and take payment to enable us to provide the relevant services under the agreement with you. However in most circumstances, we will rely on your consent when using your personal data.

### **Retention**

We hold your information for only as long as necessary for the purpose needed. For example, if you have declared gift aid, HMRC require us to store your name and address for seven years.

### **Image rights**

By participating in or undertaking a VICTA activity you are consenting to your photograph being used in our future marketing. We will always ask for consent to photograph or video children. If you consent to having your photo taken and used for marketing or PR purposes we will hold your name, image and age (if applicable) on file for future re-use.

### **HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?**

We always ensure that we have the necessary controls in place to protect the personal data you provide us. We carry out regular audits of who has access to data so that we can ensure that your information is only accessed by trained staff.

### **Your credit and debit card information**

VICTA makes every effort to maintain customer confidentiality when securing an online payment over the telephone. This includes ensuring the security of your credit card details and other personal information. We don't store your card details on any VICTA system. All of your personal information is encrypted as it travels over the internet.

### **Third parties**

Sometimes we use external companies to collect or process your personal data on behalf of VICTA. We carry out thorough checks on any companies we work with and have a contract in place with each of these companies to ensure that they process your information in line with our expectations.

Some of our suppliers may run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

If requested we may need to supply your information to the police, regulatory bodies or legal advisors.

We will not share your data with any other third parties unless you have given your explicit consent for us to do so.

### **What happens when you link to another site?**

Our websites contain links to other websites. This privacy policy applies only to our sites, so you should always be aware when you are moving to another site and read the privacy statement of any site which collects personal information. We do not pass on any personal information about you to any other site when you link to another non-VICTA site.

### **YOUR CHOICE**

You always have a choice as to whether and how you want to receive communications about our work, products and services and ways you can get involved. If you do not want us to use your contact details to contact you in the future you can opt out of this when we collect your details or at a later time.

If you ever want to change your contact preferences, or opt out of communications, you can do this at any time by contacting us by email at [admin@victa.org.uk](mailto:admin@victa.org.uk)

Alternatively, you can opt out of our email marketing at any time by clicking the unsubscribe link at the bottom of any email from us. If you choose not to be contacted by us we will never send you personalised

marketing communications, but we will keep your details on a 'suppression list' to ensure you aren't contacted.

In addition, we are also registered with the Fundraising Regulator and use the Fundraising Preference Service, a service which allows people to opt out of fundraising communications from charities. We receive regular updates from the Fundraising Preference Service so if you opt out that way, we will remove you from our email and postal communications.

While we will action all requests as quickly as possible, please allow up to four weeks for us to process from date of receipt.

### ***Vulnerable participants***

We are committed to supporting our vulnerable participants and will do all we can to assist participants in making an informed decision about the engagement they wish with VICTA. We follow the Institute of Fundraising's Code of Practice.

### ***Your right to your personal information***

Under the General Data Protection Regulation you have a number of important rights that we will always respect:

- The right of access – you can request a copy of the information we hold about you, which you will receive within one month
- The right of rectification – you can let us know if any of the information we hold about you is inaccurate, and we will correct it

You also have the right to 'be forgotten' and request that we erase any personal information we hold, where VICTA has no compelling reason to continue processing this data. If you wish to request this or your information, please contact [admin@victa.org.uk](mailto:admin@victa.org.uk)

### **CHANGES TO THIS PRIVACY POLICY**

If this privacy policy changes in any way, we will put an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances.

### **CONTACTING US**

If you have any questions, comments, or concerns about data protection at VICTA please contact our Data Protection Lead at [admin@victa.org.uk](mailto:admin@victa.org.uk)

If you are not satisfied with the response you receive from us for any reason then you may wish to contact the Information Commissioner's Office via <https://ico.org.uk/>