

### **PRIVACY NOTICE**

21&Co is committed to protecting your privacy. We aim to ensure that all information you give to us is held securely and is only used in a manner that you have consented to or would expect. This privacy notice applies to 21&Co Ltd (registered address: 15 Cotsford Avenue, New Malden, KT3 5EU) - the data controller, with regards to the personal data you have disclosed to us. A data controller is the person or organisation who determines the purpose for which, and the way, any personal data is processed. The data controller is responsible for establishing practices and policies in line with the Regulations. This notice explains how we collect, store and use your personal data. The information in this notice is provided in accordance with the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) and the General Data Protection Regulations (GDPR) which will come/came into effect on 25/5/2018.

# What information do we collect?

We collect data from you when you interact with 21&Co online, face to face, and occasionally by post, over the phone or via SMS. Some of this information is personal data which can be used to identify you. Examples of personal data include your name, address, borough, name and date of birth of your child with Down's syndrome, siblings' names, partner's name, telephone numbers and email addresses. We will only collect data which is relevant to the purpose for which you have given it and we will never pass it to a third party.

# How we use your personal data

The purpose of collecting personal data is to ensure you receive the materials/resources/services/information you may have requested and underpin the existence of 21&Co as a charity. We may also use your personal data to keep you informed about our work if you have requested this or have not opted out of receiving such communications. Examples of such communications are our newsletter and other electronic communications. We may also ask you to financially support our work by sending you fundraising appeals and information about fundraising events. We may also use your data to process any donations you have given and any Gift Aid associated with that donation. All promotional and fundraising communications are classed as Direct Marketing.

### How will we contact you?

We may contact you via email, telephone, post or SMS text. However, we will only contact you by the channel you have told us you wish to receive communications by and where we have received your consent to do so. Some supporters may not have expressed their communication preferences to us. In those cases, we will conduct a balancing exercise to determine whether we have a legitimate interest in continuing to send Direct Marketing. This balancing exercise will include recent contact and history, any previous notification that we may send Direct Marketing, whether we have previously given you a clear opportunity to opt-out of Direct Marketing and, most importantly, whether you would reasonably expect to receive information from us. We will also ensure you have not objected to receiving Direct Marketing. For email, phone and SMS we require your specific optin consent. If you are a new supporter we will aim to capture your consent for Direct Marketing purposes at the data collection point (when you join 21&Co and fill in the membership form). You do not have to give consent – it is your decision. Should you wish you can specify a time limit for your consent to remain valid for, after which time we will not be able to contact you unless you give further consent. As a default position we will consider consent to remain valid while you are receiving our regular communications and have not objected to doing so. You can give or withdraw consent to Direct Marketing, or change your contact channel preferences, at any time by writing to us at the address above; emailing Louise@21andco.org.uk or you can call us on 07785761342. Please let us know if you change your contact details or if you believe any information we hold is incorrect.

### Storing and sharing your data

21&Co stores your data on a secure cloud-based database hosted by Dropbox, which uses data centres in Germany. In order to comply with GDPR your data must be stored within the European Economic Area (EEA). Your data will not be processed outside of 21&Co and will not be disclosed to any parties outside of 21&Co, except to process donations and Gift Aid, e.g. our bank and HMRC. At no time, will your data be passed to a third party for marketing purposes.

# How long do we hold your personal data?

Your personal data will be held on our database during the period of our active relationship. We will not keep your personal data for any longer than is necessary. Once it is no longer required we will take all reasonable steps to destroy it or erase it from our systems. You can ask us to erase your data at any time.

### **Your Rights**

In relation to us processing your personal data you have the following rights, which can be exercised at any time:

- To withdraw your consent for us to process your data.
- To be forgotten to request your data is no longer processed.
- Subject access requests a right to request a copy of the data we hold about you.
- To object to your data being used by us for the purposes of direct marketing.

# What else you should know about privacy

This is general information we are obliged to give you: Remember to close your browser when you have finished your session. This will help ensure others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or internet café. You, as an individual, are responsible for the security of and access to your own computer. Please be aware that whenever you voluntarily disclose personal information over the internet that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Ultimately, you are solely responsible for maintaining the secrecy of your usernames and passwords and any account information. Please be careful and responsible whenever you are using the internet. Our pages may contain links to other websites, and you should be aware that we are not responsible for the privacy practices on other websites.

## **Your Questions**

If at any time you have any concerns or you wish to receive further information regarding 21&Co's Data Protection Policy please contact our Data Protection Officer Louise Beattie (Louise@21andco.org.uk) or 21&Co's co-chair Tatty Bowman (tatty@21andco.org.uk). A copy of 21&Co's Data Protection Policy is available upon request.

## Changes to this Privacy Notice

This privacy notice was last updated on 24<sup>th</sup> April 2018