



# Service Users and Supporters Privacy Notice 2019–2020

**We respect your privacy and are committed to protecting your personal information.**

We comply with the General Data Protection Regulation and Data Protection Act 2018 and invite you to read about our personal data processing practises in case you fundraise for us, donate to us, offer grants to us, participate in our programmes, subscribe to our newsletters, visit our website, follow us on social media, attend our events, or supply products and services to us (all data subjects referred collectively as 'service users and supporters').

## **Why are you being given this notice?**

We want to make you aware of how and why your personal information will be used by For Jimmy. It also gives you certain information that relevant data protection laws require us to provide to you.

## **Who are we?**

For Jimmy is a charity promoting peace and safety for young people and implementing that in a variety of projects. For Jimmy is based in London, United Kingdom at St Agnes House, Cresswell Park, Blackheath, SE3 9RD.

For Jimmy is responsible for deciding how personal information about you should be held and used and is a 'data controller'.

## **How we collect and process information about you?**

We will collect, store, and use certain categories of personal information and special categories of personal information, about you for specific reasons. The information that we will process will be either provided by you to us or it may be gathered from publicly available sources.

We will process your information for a range of purposes, but only when the law allows us to. Most commonly, we will use your personal information in the following circumstances:



- 1 Where we need to perform the contract we have entered into with you.
- 2 Where we have your consent to process your data.
- 3 Where it is necessary for our legitimate interests and your interests and your fundamental rights do not override these interests.

### **How will we protect your personal information?**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

### **When will we share your personal information?**

Your information may be shared with third parties only when it is required by law or where it is necessary to administer our relationship with you.

### **How long do we retain your personal information for?**

We will only retain your personal information 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.

### **What are your rights in relation to your personal information?**

Under certain circumstances, you have the right to access, verify, correct, complete or request erasure of your personal information, object to the processing of your personal data, restrict the processing of your personal data or request that we transfer a copy of your personal information to another party. If you wish to submit your request, please contact us at [dataprotection@forjimmy.org](mailto:dataprotection@forjimmy.org) or write to us at our office.



# Service Users and Supporters Privacy Policy 2019-2020

## 1 Who are we?

For Jimmy is a charity promoting peace and safety for young people and implementing that in a variety of projects. For Jimmy was founded in 2009 and is based in London, United Kingdom, at St Agnes House, Cresswell Park, Blackheath, SE3 9RD.

We are responsible for deciding how to hold and use personal information about you during and after your working relationship with us. Therefore, for the purpose of data protection legislation, we are the data controllers and serve you the information contained in this Privacy Policy.

This policy has been designed in accordance to the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and Data Protection Act 2018.

The policy applies to those individuals who fundraise for us, donate to us, offer grants to us, participate in our programmes, subscribe to our newsletters, visit our website, follow us on social media, attend our events, or supply products and services to us (all data subjects referred collectively as 'service users and supporters').

If you are our service user and supporter, it is important that you read this policy, together with any other policy or notice we may provide on specific occasions when we are processing personal data about you, so that you are aware of how and why we are using your personal information.

If you have any questions or requests, you can directly contact our representative at [dataprotection@forjimmy.org](mailto:dataprotection@forjimmy.org) or by writing to us at our office.



## 2 Data protection requirements

For Jimmy aims to comply with data protection laws. The personal information we hold about you will be:

- ▶ Used lawfully, fairly and in a transparent way.
- ▶ Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- ▶ Relevant to the purposes we have told you about and limited only to those purposes.
- ▶ Accurate and kept up to date.
- ▶ Kept only as long as necessary for the purposes we have told you about.
- ▶ Kept securely.

## 3 How will we collect and process information about you?

For Jimmy holds certain personal data, including special categories of personal data, about diverse service users and supporters.

Personal data is any information about an individual from which that person can be identified; it does not include data where the identity has been removed. Special categories of personal data relate to racial or ethnic origin, religious or philosophical beliefs, health and other specific attributes defined by data protection legislation.

We will only use your personal data when the law allows us to for specific purposes and based on relevant legal grounds. Your information will be used for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for a new purpose, we will notify you and we will explain the legal ground which allows us to do so.

If you do not provide certain information when you are requested, we may not be able to perform the contract we have entered into with you.

We do not use any automated decision-making processes when we process your personal information.

We collect, store, and use different kinds of personal data



from a range of our service users and supporters. Depending on who you are, please see a relevant section below to understand how we collect and process data about you.

**3.1. If you make donations to us,** For Jimmy may collect your name, email address, address, bank account details, credit/debit card details, information describing where you work, what is your education, interests and hobbies, and which other charities or organisations you support. We will collect this information when you send us inquiries, complete either a donation form on our website or our sponsorship form, or when we network at events. Some of this information can be disclosed to us by the Charities Aid Foundation when you make a donation. We will use information about you to fulfil our legitimate interests in order to process your donations and to store relevant records for accounting purposes. We may also ask whether you would like to receive any news from us in relation to our campaigns and actions you can take part in.

**3.2. If you take part in our fundraising campaigns,** For Jimmy may collect your name, email address, phone number, date of birth, information about your gender, age, t-shirt size, and contact details of an organisation that you represent. We may also take your photos and ask for your quotes. If you take part in Walking for Jimmy and/or other events where we are fundraising, we may ask you to provide us with the information about your health condition and emergency contact details. We will collect this information through our online sign-up forms, your enquiries and when you take part and follow up on events. Based on our contract with you, and our necessity to protect your vital interests or our legitimate interest, we will use information about you to ensure your possibility to participate in events and/or to fundraise for us in other ways, to grow the knowledge about our activities, throughout your testimonials, and we will retain some of this information to comply with legal requirements.

**3.3. If you participate in any of our programmes dedicated to children and young people,** For Jimmy may use your name, contact details, information about your school, age, gender and ethnicity. We may also use information about your learning and development outcomes, diagnosed or stated learning or developmental needs and disabilities. You may share some of your personal information with us when you complete written exercises in which you express your journey of learning, feelings and safety concerns. We may also ask you to use your photos and quotes. This information may be collected when the school refers you to us, through your enquiries and when you take part in our programmes and activities. We may also ask whether you would like to receive any news from us in relation to our campaigns and actions you can take part in. Based on your or your parents' or legal guardians' consent, we will use information about you to facilitate



your participation in our programmes and, throughout your testimonials, to grow the knowledge about our activities. We will retain some of this information for a reasonable time to trace your development journey through your participation in our programmes.

**3.4. If you help us to facilitate participation in our programmes at your school,** For Jimmy will process your name, job title, contact details and information about the school that you represent. We will collect this information from publicly available sources or through your enquiries. It is within our legitimate interest to process such information about you in order to establish a collaboration with your school and to facilitate the accessibility of our programmes to pupils.

**3.5. If you provide a funding opportunity to us,** we may collect your name and contact details from publicly available sources or through our enquiries. Based on our legitimate interest, we will use information about you to consult about available grants and to apply for them.

**3.6. If you subscribe to our newsletters,** For Jimmy will collect your name and contact details that you may provide through the online subscription form on our website or in keep-in-touch cards. If you provide this information directly to us, we will seek your consent. However, if we are already in contact with you for another purpose we will verify whether we can deliver our newsletter to you based on our legitimate interest, where you would expect to be contacted by us. We will use your personal data only to inform you about our campaigns and activities and to grow the knowledge about us. You will be given an option to withdraw your consent or to opt-out from our mailing list at any time.

**3.7. If you visit our website online or follow us on social media,** we may collect your IP address, browsing time and date, device details, as well as your name, photos and your messages to us. We will collect this information through cookies if you allow them, as well as you will provide this information directly to us when you start following us on social media or send a message. Based on our legitimate interest, we will use information about you to improve content and accessibility of our website, increase knowledge about our activities on social media and respond to your enquiries.

**3.8. If you attend our premises,** For Jimmy may collect your images which will be captured by our CCTV cameras. Based on our legitimate interest, we will retain this information for a reasonable time and use it to protect our customers, property, employees and business from any criminal and illegal activity.



#### **4 When will we share your personal information?**

We will not sell your information to any other charities or organisations.

If you sign up to participate in an event which is hosted or organised by a third-party, we may need to share some of your personal information with them which is necessary to help ensure your safe participation.

We may also need to share information with government agencies or law enforcement authorities where we have a legal obligation to do so, e.g. with HMRC in relation to donations or with police for prevention or detection of a crime.

Additionally, we use third-party service providers to help us to provide services to you and support the functioning of our back office. For example, we use service providers for the storage of your personal data, delivery of newsletters, registration to events, and facilitation of donations. We have undertaken due diligence on all these organisations and have entered into contracts requiring them to only process your information for the purposes we instruct them to and in a safe manner.

Some of our service providers are located in the US, for this reason we may need to transfer your personal information beyond the EU and EEA. In any such instance we will make sure that your personal information receives an adequate level of protection. We will take steps to ensure your privacy rights are protected and your personal information is treated in a way that is consistent with and which respects EU data protection laws, by putting in place appropriate measures, including requiring appropriate security measures.

#### **5 How do we protect your personal information?**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those staff members and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

#### **6 How long do we retain your personal information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for



the purposes of satisfying any legal or accounting 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. We have put an appropriate retention process in place to make sure that the data is retained for a reasonable time. Please contact us, if you wish to get more details.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 7 What are your rights in relation to your personal information?

As a data subject you have a number of rights listed below. If you wish to exercise any of your rights, please contact us at [dataprotection@forjimmy.org](mailto:dataprotection@forjimmy.org) or by writing to us at our office.

Under certain circumstances, you have the right to:

- ▶ **Request access to your personal information** (known as a “data subject access request”). This enables you to check whether we process any of your personal data and to receive a copy of it.
- ▶ **Request correction or completion of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected or completed.
- ▶ **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- ▶ **Object to processing of your personal information** where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object if you wish to opt-out from our mailing list.
- ▶ **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.



- ▶ **Request the transfer of your personal information to another party.** You will not have to pay any fee to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive or, alternatively, we may refuse to comply with the request.

We may also refuse to comply with your request to access personal data if the information you ask us to provide relates to our business management forecasting or planning and the disclosure of such information would likely affect our business, or where the information consists of records of our intentions in relation to any negotiations with you and such disclosure would be likely to prejudice those negotiations, or the requested information consists of a reference given (or to be given) regarding your prospective or current education, training, employment, appointment to any office or your provision of any service. If we refuse your access to personal data, we will explain the reasons in our response to you.

Additionally, you have the right to make a complaint at any time to the Information Commissioner's Office if you believe that we process your personal data inappropriately.

## **8 Changes to the privacy policy and notice**

This policy does not form part of any contract. We may update it at any time, and make the new privacy policy and notice available directly to you when we make any substantial updates.