

## **Privacy notice – Fresh Start**

### ***Who we are***

Fresh Start is an Edinburgh based charity helping people who have been homeless establish themselves in their new home. We are a charity helping to end homelessness.

We work with volunteers and organisations from a broad section of the community to deliver a range of services providing the practical and social support people need to resettle successfully.

Each year, Fresh Start helps thousands of new tenants, ranging from families to individuals, make a home for themselves. This can only be achieved by the hard work of our volunteers and the generosity of the donations we receive.

Fresh Start (Scotland) is a company limited by guarantee registered in Scotland no. SC197784. Scottish Charity no. SCO29184.

You can change how we contact you at any time, by emailing [contact@freshstartweb.org.uk](mailto:contact@freshstartweb.org.uk) or call us on 0131 476 7741.

As part of our commitment to you, we have appointed our Business Manager as the Data Protection Officer and can be contacted via email: [carrie-ann@freshstartweb.org.uk](mailto:carrie-ann@freshstartweb.org.uk)

### ***How we use your information***

This privacy notice tells you what to expect when Fresh Start collects personal information. It applies to information we collect about:

- Service Users and Trainees
- Volunteers
- Supporters
- Employees

### ***What Information we Collect and Why***

The personal information we collect and how we use will depend on your engagement with us.

Fresh Start processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

### ***The personal data that we collect may include:-***

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Work Telephone Number
- Mobile Telephone Number
- National Insurance Number

- Special Category Data for Service Users (i.e. health/medical information, details about religion, sexuality, gender etc)

*We collect information in the below ways:-*

*Direct from you when you*

- Subscribe to our online mailing and email alerts
- Visit our website
- Donate to or fundraise for Fresh Start
- Receive a service from Fresh Start
- Engage with us via Social Media
- Submit a job application
- Submit a volunteer application
- Submit a volunteer enquiry
- Referral forms regarding service users or trainees

*Indirectly*

- When you have given permission to other organisations to share your information.
- When we deliver services as part of a contract
- Information publicly available
- Via independent event organisers or fundraising sites (for example Just Giving) if you have indicated that you wish to support Fresh Start and you have given your consent for information to be shared.
- Cookies: are very small files that are stored on your computer or smart device when you visit our website. We use cookies to collect information about how visitors use our website and to make it better/easier to use.

*Service Users and Trainees*

Fresh Start is the data controller for the information you provide during the process unless otherwise stated.

When we support you with any of our services personal information collected are not shared with any third parties except if you give us specific consent to do so. We will collect your contact details and preferences, and any other data that is relevant to delivering the service to you. This information will only be used for the purposes of the service and not shared with the rest of Fresh Start unless you give us permission to do so. We will keep the data for two years, in line with contracts and government regulations.

If you accept services from us, your personal records will be held on a secure database.

*Volunteers*

If you enquire about our volunteering opportunities, we will usually collect your name, contact details, availability to volunteer, any support needs, information about any criminal convictions, and two references. With our application form we also offer the chance to complete our anonymous equal opportunities monitoring form. We collect this data so that we can contact you about volunteering opportunities that come up, and so that we ensure the safety of our other volunteers, staff and clients. With equal opportunities monitoring, we are able to anonymously measure our inclusion and accessibility across our volunteering programmes. If you volunteer with us, we will then collect your emergency contact details in case of an emergency during your time volunteering at Fresh Start. We are required to confirm the identity of our volunteers, and seek assurance as to their trustworthiness, integrity and reliability. You will therefore be required to provide:

- Proof of your identity – you will be asked to attend one of our offices with original documents, and we will take copies.
- Depending on the volunteer role, we may contact you to complete an application for a Disclosure Check via Disclosure Scotland, which will verify your declaration to work with such groups and individuals.
- We will contact your referees directly, using the details you provide in your application, to obtain references. We will keep this data for two years after you stop volunteering for us. If you volunteer with us, your personal records will be held on a secure database.

### *Supporters*

Fresh Start is the data controller for the information you provide during the process unless otherwise stated. If you support us, for example by signing up to an event, donating, signing up to Gift Aid, or signing up to a campaign, we will usually collect your name, contact details, and whether you would like to be contacted, and how we would do so. We collect this data so we can keep you up to date with information and services you have requested, or may be interested in, and to ask for more support, in the way that you have chosen; to run our events; and to fulfill our legal responsibilities for financial and Gift Aid reporting. We will keep this data for six years after you stop interacting with us.

If you accept communication from us, your personal records will be held on a secure database and SAGE.

### Use of data processors

Data processors are third parties who provide elements of our fundraising service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

We do use third-party organisations to help us collect donations such as JustGiving. We will keep your data only for as long as necessary. If you have kindly donated to us, we are required to keep this data for seven years.

### *Employees (Candidates and Fresh Start employees)*

Fresh Start has created specific documents for Employees and Candidates. These documents are:

- GDPR Privacy Notice for Employees, Workers and Contractors
- Data Protection Policy
- GDPR Privacy Notice for Candidates
- Retention Policy

### **Complaints**

Should you wish to register a complaint we will collect your name, contact details and details about the complaint to enable us to respond, monitor and improve our charity. We will hold this data for three years.

### ***Visitors to our websites***

When someone visits [www.freshstartweb.org.uk](http://www.freshstartweb.org.uk) we use a third party service, (Google Analytics), to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### ***E-newsletter***

We use a third party provider, MailChimp, a registered trademark of The Rocket Science Group, to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see MailChimp's privacy notice (<https://mailchimp.com/legal/privacy/>).

### ***Security and performance***

Fresh Start uses a third party service Marketing Concepts to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to Fresh Start website.

### ***Your data and this website***

Certain pages on our web site ask you for personal information - such as contact forms that ask for your name and e-mail address. By supplying these details, you enable us to be more specific in responding to your needs.

We act in accordance with current legislation and current Internet 'best practice' guidelines:

- We collect our information fairly, lawfully and for specific requested purposes only
- Information is only for use within Fresh Start - it will not be released to others without your consent unless we are obliged or permitted by law to disclose it
- If you send or post offensive (or in any other way inappropriate) material to us, or otherwise engage in disruptive behaviour we can use whatever information is available about you to stop the behaviour. This may involve contacting relevant third parties.

All personal information supplied is held securely - in accordance with the GDPR.

### ***People who contact us via social media***

We manage our own social media interactions. We might also obtain your personal data through your use of social media such as Facebook, YouTube and Twitter, 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.

### ***People who email us***

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government requirements. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## ***Your rights***

Under the GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you.

We will only collect the data that we need to carry out the purposes you have contacted us for, or given us permission to use it for.

To enable us to carry out the purposes you have contacted us for, there will be occasions when we will make some data collection mandatory i.e. your name and address to claim gift aid, or your email address to access our services. If you don't provide this data, we cannot carry out the purposes you have contacted us for.

We will always tell you why these fields are mandatory.

At any time that you wish you can:

1. gain access to your personal information,
2. object to the processing of your personal information,
3. object to the use of automated decision-making and profiling,
4. restrict the processing of your personal information,
5. ask for a copy of your personal data (known as data portability),
6. rectify or correct your personal information, and
7. have your personal information removed.

Where you have provided consent to be contacted or to receive a service, you will be entitled to withdraw that consent at any time.

If you are at any point unhappy with the way that we handled your personal data, you can make a complaint to the Information Commissioner's Office. To make changes to how we contact you, please contact central data management at [contact@freshstartweb.org.uk](mailto:contact@freshstartweb.org.uk).

We have appointed our Business Manager as the Data Protection Officer. For all other requests they can be contacted via email: [carrie-ann@freshstatweb.org.uk](mailto:carrie-ann@freshstatweb.org.uk)

## ***Access to personal information***

Fresh Start tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the GDPR. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Fresh Start for any personal information we may hold of you, you need to put the request in writing addressing it to our admin department, or writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting [contact@freshstartweb.org.uk](mailto:contact@freshstartweb.org.uk) or call us on 0131 476 7741.

***Links to other websites***

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

***Changes to this privacy notice***

We keep our privacy notice under regular review. This privacy notice was last updated on 15/8/2018.

***How to contact us***

If you want to request information about our privacy policy you can

Email us at [admin@freshstartweb.org.uk](mailto:admin@freshstartweb.org.uk).

or write to: Business Manager, Fresh Start, 22/24 Ferry Road Drive, Edinburgh, EH4 4BR.