

## Data Protection Policy

ACTS FAST wants everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information they share with us will be looked after or used. This Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

ACTS FAST is committed to careful and legally handling all information and data that it is given and takes this responsibility seriously.

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## 1. ACTS FAST: the data controller

ACTS FAST are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair and open manner. We will store your information securely and only for defined purposes to provide support and/or service monitoring and data processing.

We are a "data controller" for the purposes of the Data Protection Act 2018 the EU General Data Protection Regulation (GDPR) 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

## 2. How we collect information about you

Everything we do is to ensure that we alleviate the isolation, trauma and distress by holistically supporting the non-abusive family of a sexually abused child and the indirect victims of indecent images of children (IVOII). Therefore, we want to make sure you receive the communications that are most relevant to you, such as through visiting our website or receiving emails, post or phone calls.

Information can be collected in the following ways:

### **When you interact with us directly:**

This could be via a donation to us, a question about our services, applying for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, email or in person.

### **When you interact with us through partners or suppliers working on our behalf:**

This could be if you access a service which is delivered through a trusted organisation working on our behalf and always under our instruction.

### **When you interact with us through third parties:**

This could be if you provide a donation through a third party or one of the other third parties that we work with and provide your consent for your personal information to be shared with us. This may be a third-party referring agency or through website referral data processors.

### **When you visit our website:**

We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website. Our intention is to improve our services for all clients and users, not to target a specified individual.

### **From other information that is available to the public:**

To tailor our communications with you, we may collect information about you from publicly available sources or through third party subscription services or service providers on an ad-hoc basis. This does not impede any of your other rights.

## **3. Information we collect and why we use it**

### **Personal Data**

This refers to the regulation of personal information. ACTS FAST understands that personal data is different to standard data and that personal data accounts for identifiable information. It also accounts for data which is in the possession of, or is likely to come into the possession of, the data controller. This includes any opinion held about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

It is important to note that, where the ability to identify an individual depends partly on the data held and partly on other information (not necessarily data), and the data within ACTS FAST still be “personal data”.

### **We will mainly use this information:**

- To process your donations or other payments, and to verify any financial transactions. This may be for ethical or legal reasons we are obliged to carry out as part of due diligence and complying with the UK anti-money laundering regulations.
- To provide the services or goods that you have requested or may request if we feel they would be of benefit to you.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement and arrangements.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide goods and services you have requested.

We may also use your personal information to contact you about our work and how you can support ACTS FAST. This does not impede or over right any statutory right or regulation and you may have a right to request this information is removed/destroyed or edited.

## **Sensitive Personal Information**

If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Data Protection Policy. We always want to keep your information safe and will treat it as it were our own by handling with care and in a confidential manner.

You can still choose to remain anonymous if you share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work telling people's personal stories (for example, on our blog, website or funding reports). In most cases we will usually change names to maintain a clients anonymity and protect their identity, removing any personally identifiable information.

### **Sensitive data refers to:**

- The racial or ethnic origin of the data subject
- Their political opinions
- Their religious beliefs or other beliefs of a similar nature
- Whether they are a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- Their physical or mental health or condition,
- Their sexual life,
- The commission or alleged commission by the data subject of any offence, or
- Any proceedings for any offence committed or alleged to have been committed, the disposal of such proceedings or the sentence of any court in such proceedings.

ACTS FAST is aware that information about these matters could be used in a discriminatory way, and is likely to be of a private nature, so this data will be treated with greater care than other standard or personal data.

The Data Protection Act 2018 ensures that a particular method of processing will occur when ACTS FAST deals with personal data, and it will be handled with care and attention.

If you contact or engage with ACTS FAST, you may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your personal or sensitive details to anyone else without your permission except in exceptional circumstances (such as safeguarding). Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as abuse or exploitation.
- Where you have given us your consent or otherwise clearly indicated to us that you are happy for us to share your story or comment, then we may publish it on our blog or in other media. In most

cases we will usually change names to maintain your anonymity and protect your identity, removing any personally identifiable information.

- When publishing or using a comment or quote you have made, we will seek your consent in the first instance and will make a record on your file (or email record) as to what/when your permission was given to use that information. We will never publish any information in order to shame or blame any person (regardless of fault or offence) – our aim is to raise awareness of CSA issues and the impact it has on parents/carers and their families.

#### **4. Legal basis for using your information**

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you. However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for ACTS FAST to process your information to help us to achieve our vision of ensuring that everyone experiencing a problem gets both support and respect.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your personal information are where we contact you about our work via email, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with a complaint).

#### **5. Marketing**

We will only contact you about our work and how you can support ACTS FAST by your chosen method (post, email or text message, if you have agreed for us to contact you in this manner). In most instances however this will be via email as we feel it is one of the least intrusive and most convenient forms of current communication. If you would like an alternative format, please just ask and we will make a note to ensure we follow your expressed wishes as closely as possible.

You can update your choices or stop us sending you these communications at any time by emailing us. We will then reply, acknowledging your message and making a note on our communications systems as to your preferences.

#### **6. Sharing your Information**

The personal information we collect about you will mainly be used by our staff (and volunteers) at ACTS FAST so that they can support you in the most helpful and appropriate ways.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

ACTS FAST may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction and in accordance with this policy.

We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes outside of what was agreed with them. Some examples of where we may share your information are our partners who help us to manage our social media accounts, or partner agencies who specialise in certain types of support.

We enter contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information. We will never pass on your information if we feel or have reason to believe that the third party would not handle it with the proper due care and attention required.

### **Legal disclosure**

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations, and codes of practice or in response to a valid request from a competent authority); or, to enforce our conditions of sale and other agreements.

We will usually seek your permission wherever possible first, and in most cases, you will have made the request for that information to be passed onto the third party as part of your care or support package. Where we are legally bound or court ordered to pass information on, we may or may not have a duty to inform you this information has been passed on. In most cases we will however be actively engaging with you in order to best support you and your family's needs.

## **7. Keeping your information safe**

We take looking after your information very seriously. We've implemented appropriate measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction, and loss.

These rules describe how and where data should be stored safely. Questions about storing data safely can be directed to the data controller (see section 9 for more information).

When data is stored on paper, it is kept in a locked filing cabinet where unauthorised people cannot access it. Any printed material with your information is not left where unauthorised people can access it, and it will be stored in a securely locked cabinet or location.

When data is stored electronically, we will protect it from unauthorised access, accidental deletion, and malicious access attempts. ACTS FAST has a responsibility of making sure all employees who work with data take reasonable steps to ensure it is kept at accurately and up to date as possible.

For example:

- Data will be held in as few places as necessary for the purpose it is being kept.
- ACTS FAST will not create any unnecessary additional data sets or duplicate data where it is not necessary.
- ACTS FAST will take every opportunity to ensure data is updated, when necessary, which can be achieved by an individual informing us (usually by email).
- Digital files will only be stored with reputable, trusted suppliers who operate suitably secure procedures.
- Digital cloud-based files will be protected by two-factor authenticated passwords for industry leading security.
- HTTPS 2048-bit SSL security is used to store client information when stored with our data storage service ("Cliniko"). This ensures end-to-end encryption keeps data secure and unreadable by any third party.
- Our hosting partner uses Amazon AWS and have the following certifications for secure storage of the information we process and store with them:
  - PCI DSS Level 1 (Payment Card Industry Data Security Standard)
  - ISO 27001 (Information Security Management System)
  - FIPS 140-2 (United States Federal Information Processing Standard)

This data is stored on servers located in the UK and so has the benefit of being protected by UK law.

Please note:

- We cannot be held liable for the actions of third parties beyond our immediate control. We will however take reasonable and proper steps to only select trustworthy suppliers.
- We cannot be held liable for any third party links, websites or information, such as that on blogs or our website.
- Any debit or credit card details which we receive on our website are passed securely to our payment processing partners in accordance with their terms and according to the Payment Card Industry Security Standards, using encrypted methods of communication.
- ACTS FAST understands that it has a responsibility to ensure that data is not breached and will follow correct procedure if this occurs.

## **8. How long we hold your information for**

ACTS FAST generally holds information for a period of 6 years following the last tax year, and this applies for clients, members of staff, trustees and volunteers who leave the charity. This is for the purposes of research, defense in any claims, administrative or monitoring purposes, or in the public interest. Certain types of information may be held longer than this time in order to fulfill specific needs or if duty bound under data protection laws.

The information will only ever be held for use in line with the manner to which it was originally collected. It will be securely destroyed or deleted at the end of this period.

## 9. Your rights and the data controller

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting the data controller mentioned in section 1. The data controller for the purposes of this policy is ACTS FAST. All enquiries should be addressed to “the data controller” who can be contacted on email: [support@actsfast.org.uk](mailto:support@actsfast.org.uk).

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request and there may be a small fee to cover the time required to administrate your particular enquiry. Please make all requests for access in writing, and provide us with evidence of your identity (if required).
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) 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 where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time in writing by email above.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you, by email to the above data controller.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request for a variety of practical or legal reasons.

## 10. Cookies

A 'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you and we have no intention of being able to do so via our website.

### How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

### The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their [UK Cookie Guide](#).

We use all four categories of cookies:

- **Strictly necessary** cookies are essential for you to move around our website and to use its features.
- **Performance** cookies collect anonymous information about how you use our site, like which pages are visited most.
- **Functionality** cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- **Targeting** or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. As such if you visit the Acts Fast website you may then be more likely to see adverts about ACTS FAST work on other websites as your browsing suggests that this is an area of interest.

You can opt out of all our cookies (except the strictly necessary ones). [Find out how to control and delete cookies](#) in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

If you have any questions about how we use cookies, please contact us.

## 11. Monitoring

Your communications with our team (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards and monitor any inappropriate use of our services.

This does not impact or remove any of your statutory rights or obligations.

### **Our use of your personal details**

- We use carefully selected suppliers to help us deliver our communications and services and we will keep any personal information safe, only using your details to contact you in the ways you've agreed to.
- We will treat and handle your data carefully as if it were our own.
- We will always respect your right to privacy and adhere to laws around the use of data.
- When necessary, we may share data with our own carefully regulated and monitored external suppliers, for processing purposes. We will ensure their use of the data is in line with our own data protection policies and not kept or used by them for any other purposes.

### **Suppliers we work with**

- Sometimes we work with external suppliers to support you or process your information. These are carefully selected.
- We will only work with professional organisations that meet our high standards and in the best interests of our clients and service users.
- We will act quickly if third party suppliers do not meet the high standards we set, taking remedial action with them as required.

Should you require any further information, please contact the data controller, ACTS FAST on: [support@acstfast.org.uk](mailto:support@acstfast.org.uk)