

## **Action Hampshire Privacy and Cookie Policy**

The processing of your personal data is carried out by or on behalf of Action Hampshire (our legal name is Community Action Hampshire).

Action Hampshire is a registered charity in England and Wales (1053806) and a registered company in England and Wales (3162873).

### **How can you contact us?**

If you have any questions or concerns regarding our Privacy Policy or our processing of your personal information, please contact:

The GDPR Officer  
Action Hampshire  
Westgate Chambers  
Staple Gardens  
Winchester  
SO23 8SR

Email: [info@actionhampshire.org](mailto:info@actionhampshire.org), or by telephone at 01962 854971

### **Notification of change of Privacy & Cookie Policy**

This Privacy & Cookie Policy may change from time to time. Please visit this website section periodically in order to keep up to date with the changes in our Privacy Policy.

### **Cookie Consent**

By using our website, our social media pages (such as Facebook and Twitter) and subscribing to our services, you agree that, unless you have set your computer's browser to reject them, we can place the types of cookies set out below on your device and use that data in accordance with this policy.

In order to remember that you have accepted our use of cookies, we will place a temporary cookie to remember your consent for 3 months. For more information about how we use cookies on this site, please review our Cookie Policy below.

### **Privacy Policy**

*How do we collect your information?*

We may collect information about you directly whenever you interact with us. For example, when you contact Action Hampshire regarding our activities, subscribe to our newsletters, submit a membership application, send or receive information or engage with our social media, you may provide us with your personal information.

We may also receive information about you when you interact with third parties with whom we work. For example, when you book on one of our events through

Eventbrite (which is a third party website) and give them permission to share your information with us.

We may supplement what we know about you with information that is available to the public. For example, in order to ensure that our communication with you is relevant to you, we may collect information about you from publicly-available sources.

We may collect aggregated or anonymous information when you visit our website or interact with our content. For example, we may collect information about the website content you click on, so we can see which content is the most popular. Please see our Cookie Policy for more detail.

### **What information do we collect?**

The information we collect from you directly or from third parties with whom we work, may include:

- name
- address
- email address
- telephone number
- contact preferences
- bank account details
- debit/credit card details
- date of birth, age, and/or gender, where appropriate

We may also collect and process information about your interactions with us, including details about our contacts with you through email, SMS, post, on the phone or in person (ie the date, time, and method of contact), details about events or activities that you register to attend and any other support we provide you with. We may also collect and record any other relevant information you share with us about yourself, such as your affiliations with other charities or other not-for-profit organisations.

In order to ensure that our communication with you is relevant and tailored to your background and interests, we may supplement what we know about you with information that is available to the public, through internet searches or public databases (eg Companies House or the Charity Commission), such as information about trusteeships and directorships, published biographic information, employment, networks and relevant media coverage. This allows us to better understand your interests and preferences, so that we can contact you in the most appropriate way and to ensure that we do not send you unwanted communications. We may collect this information ourselves or through third-party service providers. For more information on how we work with service providers, please see 'How will we disclose the information we have collected to outside parties?'

### **Do we process 'sensitive' personal information?**

Under data protection law, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs, and political opinions ('sensitive personal data'). In limited cases, we may collect sensitive personal data about you, if you give your consent for us to do so. We would only collect sensitive personal data if there is a clear reason for doing so, eg for our School for Social Entrepreneurs. We would only process the sensitive information you have provided to us, and will not seek to supplement it or gather further sensitive information from other sources.

## **How do we use your information?**

We may use your information in a number of ways, including:

- to provide you with information, products or services that you have requested from us or that we feel may be of interest to you;
- to provide you with information about our work or our activities;
- to invite you to participate in interactive features on our website;
- to process donations we may receive from you;
- for administrative purposes (eg we may contact you regarding an event for which you have registered, or to get further information to support your membership application)
- for internal record keeping in order to keep our staff as informed as possible about our work with organisational contacts and individuals and for reporting purposes to demonstrate our impact
- to invite you to participate in voluntary surveys or research;
- to contact you where you have been identified as a contact person for an organisation,
- to analyse and improve the content and operation of our website;
- to analyse and improve our internal business processes;
- to analyse the personal information we collect about you and use publicly available information to better understand your interests and preferences so that we can contact you in the most appropriate way and to ensure that we do not send you unwanted communications;
- where we are required by law to disclose or otherwise use your information.

If you have provided us with your email, postal address or telephone number, we may contact you send you information about our work or other communications (eg to check your details are correct, or to send you details about our AGM).

If you do not wish to provide us with your personal data, please note that we may be unable to supply you with our services.

## **How will we combine and analyse the information we collect about you?**

We are committed to communicating with you using an approach that is right for you. This means that we carefully manage the communications we send you to ensure that we are contacting you in the most appropriate way and that we are not sending you unwanted communications. In order to do this, we may combine the

information that we collect about you and analyse what we know about your interests, preferences and level of potential engagement. We may also use statistical analysis to analyse this data and understand the likelihood that you will be interested in or responsive to a campaign or message. We may use third party service providers to assist us in this process, eg Mailchimp or Survey Monkey. For more information on how we work with service providers, please see 'How will we disclose the information we have collected to outside parties?'

You can opt out of your data being combined and analysed for marketing purposes by contacting our [GDPR Officer](#). However, this may mean that you stop receiving marketing communications from us more generally.

### **How will we disclose the information we have collected to outside parties?**

Subject to your consent, Action Hampshire may provide your individual contact details, and other relevant information, to third parties. This is usually the general public or people from other agencies who have similar interests and aims to Action Hampshire. We record your consent to pass on your individual details on our database and you are free to withdraw your consent at any time.

We will pass on generic information about your organisation, including your organisation's name, purpose and contact details which relate to the organisation (but not to individuals). If you would rather we did not do this, please let us know.

We think that this information sharing helps partnership working within the sector; helps partnership working between the sectors; and helps the public to find the information and support they need from the not-for-profit sector.

We also use third party service providers such as Mailchimp and Salesforce. We enter into contracts (Data Processing Addenda) with these service providers that require them to comply with data protection laws and to ensure that they have appropriate controls in place to protect the security of your information.

We will never sell your details and, except as indicated below, will only share your details with third parties if you ask us to. We will not make cold telephone calls to members of the general public and, therefore, will not purchase your data in order to do so.

We may disclose your personal information if we are requested or required to do so by a regulator or law enforcement or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect Action Hampshire, for example in cases of suspected fraud or defamation, or in order to comply with any other applicable legal obligation.

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

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk.

We may use the services of a service provider (eg Salesforce and Mailchimp) outside the European Economic Area (EEA) – this may include a country which does not have the same level of data protection as in the United Kingdom. However, unless they are located in a country which has been assessed by the European Commission as ensuring an adequate level of protection for personal data, we will only use a service provider outside the EEA on the basis of an agreement with the service provider, designed to protect your data, in the appropriate form approved for this purpose by the European Commission. We will take all steps reasonably necessary to ensure that your data is processed securely and in accordance with this Privacy Policy.

### **How can you change your marketing preferences or update the information we hold about you?**

We try to make it clear and easy for you to choose how you hear from us. If you are applying for membership but do not wish us to use your personal data for marketing purposes as outlined above, you can use the relevant boxes on the online application form to tell us this.

You can also change any of your marketing preferences at any time (including telling us that you don't want us to contact you for marketing purposes) by:

- Indicating that you do not wish to receive our marketing emails by clicking the 'unsubscribe' link in at the end of our Mailchimp emails;
- Contacting us by email at [info@actionhampshire.org](mailto:info@actionhampshire.org), or by telephone on 01962 854971, or by writing to us at:

Action Hampshire  
Westgate Chambers  
Staple Gardens  
Winchester  
Hampshire  
SO23 8SR

If you have indicated that you do not wish to be contacted for marketing purposes, we will maintain your details on a suppression list to help ensure that we do not continue to contact you for marketing purposes. However, we may still need to contact you for administrative purposes, including (but not limited to):

- Ensuring we have your correct details on our database;
- Providing you with the information you need in order to participate in an activity or event for which you have registered
- Explaining and apologising where we have made a mistake.

Similarly, if your contact details have changed or you think any information we have about you is incorrect or incomplete, you can always update or correct the information we hold about you by contacting us as explained above.

### **What other data protection rights do you have?**

You can make a complaint or raise a concern about how we process your personal data by contacting our [GDPR Officer](#). In some circumstances, you have the right to object to our processing of your personal data or to stop us from continuing to make active use of personal data that we retain in our records.

If you are not happy with how we have handled your complaint, you can contact the [Office of the Information Commissioner](#), which oversees the protection of personal data in the UK, or the Fundraising Regulator, which is responsible for overseeing fundraising activities carried out by charities in the UK.

Alternatively, you may choose to contact either the Information Commissioner or the Fundraising Regulator directly about your complaint, regardless of whether you have raised it with us first.

You also are entitled to request a copy of the personal information relating to you which is kept on file by Action Hampshire (for which we may charge a small fee) by contacting our [GDPR Officer](#).

### **Why are we allowed to process your personal information?**

Our Privacy and Cookie Policies take into account several laws, including:

- the Data Protection Act 1998
- the Privacy and Electronic Communications (EC Directive) Regulations 2003
- General Data Protection Regulation (EU) 2016/679, which came into force in the UK in May 2018 and replace the Data Protection Act 1998.

Generally, our processing of your personal information as described in this policy is allowed by these laws because we have a legitimate need to carry out the processing for the purposes described above. Some processing may also be necessary so that we can perform a contract with you or because it is required by law. We only use your information to send you marketing communications by email or text with your consent, and you can always opt out of receipt of marketing communications by post or telephone as explained below.

### **Job and volunteer applicants and current and former employees**

We have a separate privacy policy for job applicants, and for staff and volunteers. This is supplied to job applicants on application, and to staff and volunteers internally. It is also available on request.

## **Other websites**

We cannot be held responsible for the privacy of data collected by websites not owned or managed by Action Hampshire, including those linked through our website.

## **Emails terms of use**

Emails are not always secure, and they may be intercepted or changed after they have been sent. Action Hampshire does not accept liability if this happens. The contents of emails reflect their author's views and not necessarily those of Action Hampshire.

Please do not send Action Hampshire any financial data through email.

The information in emails is confidential, so if you've received one by mistake, please delete it without copying, using, or telling anyone about its contents.

## **Cookies and how we use them**

### ***What are cookies?***

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device and to target the content displayed to the user's interests.

You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu)

### ***Do we use cookies?***

Yes.

### ***Types of cookies***

There are two broad types of cookies - 'first party cookies' and 'third party cookies':

First party cookies are cookies that are served directly by the website operator to your computer, and are often used to recognise your computer when it revisits that site and to remember your preferences as you browse the site. Basically, these are our cookies.

Third party cookies are served by a service provider on behalf of the website operator, and can be used by the service provider to recognise your computer when you visit other web sites. Third party cookies are most commonly used for web site analytics or advertising purposes.

In addition, cookies may be either 'session cookies' or 'persistent cookies'. Your computer automatically removes session cookies once you close your browser. Persistent cookies will survive on your computer until an expiry date specified in the cookie itself, is reached. We use both session and persistent cookies.

We also use 'Performance cookies'. These cookies collect information about how the user makes use of the site, eg which pages the user visits most. These cookies do not collect information that identifies the user.

We have assessed our cookies based on the [ICC Cookie Guide](#).

### ***What information do we collect using cookies?***

We may collect some, or all, of the information available from cookies when you visit our website, depending on how you use it. We monitor how people use our website so we can improve it. We collect this information anonymously.

However, you can choose to use our website anonymously without giving us any information. Please see 'Changing your cookie preferences' below.

If you visit our website, we may use cookies to record information about:

- the areas of the website you visit;
- the amount of time you spend on the site;
- whether you are new to the site, or have visited it before;
- the country, region, city and/or borough associated with your IP address or device;
- how you came to our website – for example, through an email link or a search engine;
- the type of device and browser you use;
- how you use the website and the quality of your experience – for example we may track your bandwidth when viewing videos;
- how you interact with our donation and sign up forms – for example what you select as your communication preferences; and
- any error messages that you receive on the site

We use cookies to track how visitors come to our site. For example, we use marketing or referring tracking codes in internet addresses (URLs) to show us whether a visitor has come to our site via a link on a referring website or in a specific piece of marketing and to give us insight into the effectiveness of our marketing. Some of this information may be used by third party cookies to target you with relevant advertising (see below).

Although not through cookies, we do measure the success of the mailings we send – so we know what subject lines and stories people liked the most and to ensure our newsletters and other bulletins remain relevant and interesting to our users. We do not share this information with third parties.



## ***Website statistics analytics, testing and personalisation***

Our website uses the following web analytics services:

**Google Analytics** a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which (as discussed above) are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more details please read [Google's Analytics overview](#).

You can always opt-out of Google Analytics cookies by [Google's opt-out tool](#).

### **Other third-party cookies**

You may notice some other cookies that are not related to Action Hampshire's website whilst visiting [www.actionhampshire.org](http://www.actionhampshire.org). Some of our pages contain embedded content such as YouTube video, Twitter feed or Facebook likes and you may receive cookies delivered from these websites. Action Hampshire does not govern the publication of third-party cookies. To understand more about their cookies and privacy statements, please visit the relevant sites.

If you do not want cookies to be stored on your PC it is possible to disable this function without affecting your navigation around the site.

### **Changing your cookie preferences**

The "Help" menu in the toolbar of most web browsers will tell you how to change your browser's cookie settings, including how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. Below is some helpful guidance about how to make these changes.

#### *How to disable cookies*

If you are using Microsoft Internet Explorer and you wish to block Action Hampshire's website cookies, you can perform the following:

1. On your browser tools menu, select 'Internet Options'

2. Click on the 'Privacy' tab and then on the 'Sites' button
3. Type into the 'Address of website' field: <http://actionhampshire.org/>

5. Click on the 'Block' button

6. Click on the OK button

Find out more information about blocking or deleting cookies [using Microsoft Internet Explorer.](#)

7. Other browsers:

- [Firefox cookie management](#)

- [Chrome cookie management](#)

- [Safari cookie management](#)

[Find out more detailed information on disabling cookies.](#)