



Data Protection & Website Privacy Policy

V3.0

Dated:	September 2017
Next Review Date:	September 2019

SECTION 1 – DATA PROTECTION

INTRODUCTION

Preservation of your privacy is important to the Alcohol Education trust and we are committed to letting you know how we use your personal information and for making only responsible use of your data in line with the Data Protection Act 1998.

In order to operate efficiently, The Alcohol Education Trust collects information about people with whom the organisation works. These may include members of the public, school teachers, current, past and prospective employees, Board Members, volunteers, and partner organisations.

This document outlines the details of how The Alcohol Education Trust deals with the data collected from the groups of people mentioned above.

INFORMATION COVERED BY THE ACT

The Act uses the term ‘personal data’. For information held by The Alcohol Education Trust, personal data essentially means any recorded information held by us and from which a living individual can be identified. It will include a variety of information, including names, addresses, email addresses, telephone numbers, photographs of people and other personal details.

SCOPE

The aim of this policy is to ensure that the trustees, employees and those that provide services on behalf of the Alcohol Education Trust are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

Any trustee, employee or contractor who breaches this policy will be dealt with under The Alcohol Education Trust’s disciplinary procedures.

Failure to adhere to the Data Protection Act 1998 is unlawful and could result in legal action being taken against The Alcohol Education Trust, and its trustees, employees or those that provide services on behalf of The Alcohol Education Trust.

MEMBERS OF THE PUBLIC, TEACHERS & OTHER ORGANISATIONS

a. Data Collected

The Alcohol Education Trust collects information from members of the public, teachers & other organisations to assist in the efficient running of the charitable activities of the trust.

b. Use of Data

Personal data is collected over the phone and using other methods such as email or data collection paperwork. During this initial contact, the data owner is given an explanation of how this information will be used as appropriate. Written consent is not requested as it is assumed that the consent has been granted when an individual freely gives their own details.

The Alcohol Education Trust respects the privacy of email addresses and any emails sent by the organisation to multiple recipients will be sent via a secure email system or with addresses in the BCC field so that the email list is not visible to recipients.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation, in which case the Chief Executive will discuss and agree disclosure with the Chair of Trustees.

BOARD MEMBERS, EMPLOYEES AND VOLUNTEERS

Applications for board members, employees and volunteers are kept for 6 months for unsuccessful candidates and up to 6 years following the end of any employment. Paper based systems are stored securely by the Administrator/Chief Executive and electronically on the Administrator/Chief Executive's computers.

All personnel information is kept for up to 5 years after the end of the employment for reference purposes.

The private contact details of Board Members, Employees and Volunteers will not be made available to any members of the public or any commercial or charitable undertaking without prior permission.

USE OF PHOTOGRAPHS

Where practicable, The Alcohol Education Trust will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), The Alcohol Education Trust will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisations website.

PARTNER ORGANISATIONS

Any information that The Alcohol Education Trust holds about Partner Organisations will be held securely and contact details will only be passed on to organisations or individuals if the contact details are available in the public domain or prior permission has been sought.

VIEWING INFORMATION

Under the Data Protection Act 1988, any individual has a right to request a copy of any information that we hold about them and we will supply a copy of any personal data held where a request is made. A small fee of £10 may be payable for providing this information and the fee charged will be at the discretion of the Chief Executive.

COMMITMENT TO DATA PROTECTION

The Alcohol Education Trusts designated person with responsibility for Data Protection is the Chief Executive. Any queries regarding Data Protection at The Alcohol Education Trust should be directed to the Chief Executive.

The Alcohol Education Trust ensures that:

- Everyone managing and handling personal information is trained in accordance with the Data Protection Act 1988
- Queries about handling personal information are dealt with promptly
- Any disclosure of personal data complies with approved procedures
- All necessary steps are taken to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure

SECURITY

- We will take reasonable precautions to prevent the loss, misuse or alteration of information you give us.
- Communications will be sent by email. For ease of use and compatibility, communications will not be encrypted unless you require it and provide the certification to enable us to communicate with you in that way. Email, unless encrypted, is not a fully secure means of communication.
- Whilst we endeavor to keep our systems and communications protected against viruses and other harmful effects we cannot bear responsibility for all communications being virus-free.

SECTION 2 – WEBSITE PRIVACY

What is this Privacy Policy for?

This privacy policy is for www.alcoholeducationtrust.org and www.talkaboutalcohol.com/ and served by The Alcohol Education Trust and governs the privacy of its users who choose to use it.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore the way this website processes, stores and protects user data and information will also be detailed within this policy.

The Website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to all UK national laws and requirements for user privacy.

Use of Cookies

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computers hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information [<http://www.google.com/privacy.html>].

Other cookies may be stored to your computers hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

How to change your Cookies

First party cookies: Your web browser settings allow you to refuse any cookie or to alert you to when a cookie is being sent. They also allow you to control cookies stored on your hard drive.

Third party cookies: The above applies but as mentioned before the only third party cookies we use are essential to complete certain tasks.

Please note that if you change your cookie settings, some of the features on our site may not work as well as we intend.

Contact & Communication

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998. Every effort has been made to ensure a safe and secure form to email submission process but advise users using such form to email processes that they do so at their own risk.

This website and its owners use any information submitted to provide you with further information about the products / services they offer or to assist you in answering any questions or queries you may have submitted. This includes using your details to subscribe you to any email newsletter program the website operates but only if this was made clear to you and your express permission was granted when submitting any form to email process. Or whereby you the consumer have previously purchased from or enquired about purchasing from the company a product or service that the email newsletter relates to. This is by no means an entire list of your user rights in regard to receiving email marketing material. Your details are not passed on to any third parties.

Email Newsletter (applies to www.alcoholeducationtrust.org only)

This website operates an email newsletter program, used to inform subscribers about products and services supplied by this website. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003. All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 1998. No personal details are passed on to third parties nor shared with companies / people outside of the company that operates this website. Under the Data Protection Act 1998 you may request a copy of personal information held about you by this website's email newsletter program. A small fee will be payable. If you would like a copy of the information held on you please write to the business address at the bottom of this policy.

Email marketing campaigns published by this website or its owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity [this is by no far a comprehensive list].

This information is used to refine future email campaigns and supply the user with more relevant content based around their activity. If you wish to disable tracking then please unsubscribe from our mailing list.

In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to un-subscribe at any time through an automated system. This can be done by either unsubscribing at the bottom of your most recent email sent from us, or by calling us on 01300 320 869. Please note that unsubscribing from a particular newsletter will only remove you from that particular circulation list for that email address.

External Links

Although this website only looks to include quality, safe and relevant external links, users are

advised adopt a policy of caution before clicking any external web links mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

Shortened Links in Social Media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default some social media platforms shorten lengthy urls.

Users are advised to take caution and good judgement before clicking any shortened urls published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine urls are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

Resources & Further Information

- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [Privacy and Electronic Communications Regulations 2003 – The Guide](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Mailerlite Privacy Policy](#)

Appendix 1 – Information from The Data Protection Act (1998)

DATA PROTECTION PRINCIPLES

The eight enforceable data protection principles ensure that personal data is:

1. used fairly and lawfully
2. used for limited, specifically stated purposes
3. used in a way that is adequate, relevant and not excessive
4. accurate
5. kept for no longer than is absolutely necessary
6. handled according to people's data protection rights
7. kept safe and secure
8. not transferred outside the European Economic Area without adequate protection

CONDITIONS

At least one of the following conditions must be met before any personal data is processed:

1. the individual has consented to the processing in writing
2. the processing is necessary for the performance of a contract with the individual
3. the processing is required under a legal obligation (other than one imposed by a contract)
4. the processing is necessary to protect vital interests of the individual
5. the processing is necessary to carry out public functions e.g. administration of justice
6. the processing is necessary in order to pursue our legitimate interests or those of third parties (unless it could unjustifiably prejudice the interests of the individual)

Information about racial or ethnic origin, political opinions, religious and other beliefs, trade union membership, physical or mental health condition, sexual orientation, criminal proceedings or convictions are treated as 'sensitive personal data'. At least one of the following additional conditions must be met before any sensitive personal data is processed:

1. the individual has explicitly consented to the processing
2. we are required by law to process the information for employment purposes
3. we need to process the information in order to protect the vital interests of the individual or another person
4. the processing is necessary to deal with the administration of justice or legal proceedings

INDIVIDUALS' RIGHTS

Individuals' rights under the Act include:

1. a right of access to a copy of the information comprised in their personal data;
2. a right to object to processing that is likely to cause or is causing damage or distress;
3. a right to prevent processing for direct marketing;
4. a right to object to decisions being taken by automated means;

5. a right in certain circumstances (as per the Act) to have inaccurate personal data rectified, blocked, erased or destroyed; and
6. a right to claim compensation for damages caused by a breach of the Act.

LEGAL REQUIREMENTS

While it is unlikely, The Alcohol Education Trust may be required to disclose user data by a court order or to comply with other legal requirements. All reasonable endeavours will be made to notify the user, unless there are legal restrictions on doing so.

NO COMMERCIAL DISPOSAL TO THIRD PARTIES

The Alcohol Education Trust shall not sell, rent, distribute or otherwise make user data commercially available to any third party, except as described above or with prior permission.

Further information is available from the information commissioner at <https://ico.org.uk/for-organisations/guide-to-data-protection/>