



Data Protection & Privacy Policy

FINAL V4.2

DEFINITIONS

CIO	Means The Alcohol Education trust, a registered charity
GDPR	Means the General Data Protection Regulation
Responsible Person	Means Chief Executive of the Alcohol Education Trust
Register of Systems	Means a register of all systems or contexts in which personal data is processed by the charity as defined in the Data Audit
Basic Information	Means First Name, Last Name, Job Title, Email address, Business Name & Address.

Dated:	November 2020
Next Review Date:	November 2022

SECTION 1 – DATA PROTECTION

1.1 PURPOSE

Data protection and the preservation of your privacy is important to the CIO 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 GDPR.

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

This document outlines the details of how the CIO deals with the data collected from the groups of people mentioned above.

1.2 DATA PROTECTION PRINCIPLES

The CIO is committed to processing data in accordance with its responsibilities under GDPR.

GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

1.3 GENERAL PROVISIONS

- a) The policy applies to all personal data processed by the CIO
- b) The Responsible Person will take responsibility for the CIO’s ongoing compliance with this policy
- c) This policy will be reviewed at least annually
- d) Where required, the CIO will register with the Information Commissioner’s Office (ICO) as an organisation that processes personal data

1.4 LAWFUL, FAIR & TRANSPARENT PROCESSING

- a) To ensure its processing of data is lawful, fair and transparent, the CIO will maintain a Register of Systems
- b) The Register of Systems will be reviewed at least annually
- c) Individuals have the right to access their personal data and any such requests made to the CIO will be dealt with in a timely manner.

1.5 LAWFUL PURPOSES

- a) All data processed by the CIO must be done on one of the following lawful bases: Consent, contract, legal obligation, vital interests, public task or legitimate interests (See ICO Guidance for more information)
- a) The CIO will note the appropriate lawful basis in the Register of Systems
- b) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent will be retained by the CIO
- c) Where communications are sent to individuals, the option for the individual to revoke their consent or object to processing will be clearly shown and systems will be in place to ensure such revocation is reflected accurately in the CIO's systems

1.6 DATA MINIMISATION

The CIO will ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

- a) Newsletter Recipients - we will only collect basic information to allow us to keep them up-to-date, particularly with changes to our resources and general news via the newsletter
- b) Trustee Information – we will only collect the information required to govern the CIO in accordance with the Charity Commission Laws and Guidance for smaller charities
- c) Staff Information – we will only collect information needed under our safer recruitment policy, details to create our terms of employment, and other information necessary to carry out those terms of employment and information to satisfy payroll and HMRC requirements
- d) Grant & Donations – we will only collect basic information regarding the funder plus details of any funding provided and related terms
- e) Contracts – we will collect information necessary to enter into and meet the terms of any contracts
- f) Paying Customers – initial card payment details will be provided to a third party payment processor who specialize in the capture and processing of credit/debit card and PayPal transactions – your card information will not be held by us. We will also collect basic information to enable us to keep customers up to date, particularly with changes to our resources and general news via our newsletters.
- g) Community Fundraising Supporters & other local contacts – we will only collect basic information to allow us to keep supporters up-to-date, particularly with local fundraising events and general news via our newsletters
- h) Media & Press - we will only collect basic information to allow us to keep them up-to-date, particularly with press releases

1.7 ACCURACY

- a) The CIO will take all reasonable steps to ensure personal data is accurate.
- b) If you change your email address or any other information we hold is inaccurate or out of date then please let us know by emailing info@alcoholeducationtrust.org

1.8 ACCESS TO YOUR INFORMATION

- a) The CIO will not sell or rent your information to third parties
- b) The CIO will not share your information with third parties for marketing purposes
- c) When using our online shop or subscription area then payment details will be used by our third party payment processor who specialises in the secure online capture and processing of debit/credit card and PayPal transactions.
- d) If you do not wish to receive communication from us about the vital work we do to keep young people safe around alcohol then you can unsubscribe at any time by clicking 'Unsubscribe' at the bottom of our email communications or by sending an email to info@alcoholeducationtrust.org
- e) You have the right to ask for a copy of the information that the CIO holds. Any requests should be emailed to info@alcoholeducationtrust.org.

1.9 ARCHIVING & REMOVAL

To ensure that personal data is kept for no longer than necessary, the CIO will adhere to the following retention periods, after which time the data will be deleted.

Group	Retention Period
1. Newsletter Recipients	We will renew our Privacy Notices every two years with the option to unsubscribe at any time
2. Trustee Information - Recruitment of a new trustee - Current & Past Trustees	Six months after recruitment process for unsuccessful candidates Three years after resignation
3. Staff Information - Recruitment of staff - Current & Past Staff	Six months after recruitment process for unsuccessful candidates Three years after resignation (except HMRC data which will be seven years)
4. Grants & Donations - Current & Past Funders - Prospective Funders	We will renew our Privacy Notices every two years with the option to unsubscribe at any time Within six months where support is not forthcoming
5. Contracts	We will renew our Privacy Notices every two years with the option to unsubscribe at any time
6. Paying Customers - Via online shop - Via Subscription Area	We will renew our Privacy Notices every two years with the option to unsubscribe at any time
7. Community Fundraising Supporters & other local contacts	We will renew our Privacy Notices every two years with the option to unsubscribe at any time
8. Media & Press	We will renew our Privacy Notices every two years with the option to unsubscribe at any time

1.10 SECURITY

- a) The CIO will ensure that personal data is stored securely using modern software that is kept up-to-date.
- b) Access to personal data shall be limited to personnel who need access and all staff computers & laptops will have password protection in place to avoid unauthorized sharing of information.
- c) When personal data is deleted this will be done safely so that the data is irrecoverable.
- d) Appropriate back-up and disaster recovery procedures are in place

1.11 BREACH

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access to, personal data, the CIO will follow ICO Guidance to promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

SECTION 2 – WEBSITE PRIVACY

2.1 What is this Website Privacy Policy for?

This website privacy policy sets out how the Alcohol Education Trust (the CIO) uses and protects any information that you give the CIO when you use our websites www.alcoholeducationtrust.org and <http://www.talkaboutalcohol.com/>.

The CIO is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our websites, then you can be assured that it will only be used in accordance with this privacy policy.

The CIO may change this policy so users should check back from time to time to ensure they are happy with any changes. This policy is effective from 25th May 2018.

2.2 What we collect via our websites

We only collect basic information to allow us to keep you up to date with the work of the CIO e.g. First Name, Last Name, Job Title, Email address, Business Name & Address. If you are using our online shop or Subscription Area then payment details will be provided to our third party payment processor who specialises in the secure online capture and processing of debit/credit card and paypal transactions.

2.3 Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and internal procedures to safeguard and secure the information we collect online.

2.4 How we use cookies

Our websites use cookies to better the users experience while visiting the website. Where applicable our websites use 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 computer's 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 computer's 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.

2.5 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.

2.6 Links to other websites

Our websites may contain links to other websites of interest. However, once you have used these links to leave our site, you should be aware that we do not have any control over that other website. Although our websites only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website and look at the privacy statement of the website in question.

The CIO 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.

2.7 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 with 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.

2.8 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.

2.9 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 GDPR. 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.

2.10 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 GDPR. All personal details relating to subscriptions are held securely and in accordance with GDPR. No personal details are passed on to third parties nor shared with companies / people outside of the company that operates this website.

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.

2.11 Controlling your personal information

Under GDPR, you may request a copy of personal information held about you by this website's email newsletter program. If you would like a copy of the information held on you please email info@alcoholeducationtrust.org

In compliance with GDPR 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, by calling us on 01300 320 869 or by emailing info@alcoholeducationtrust.org. Please note that unsubscribing from a particular newsletter will only remove you from that particular circulation list for that email address.

If you believe that any information we hold is incorrect then please email us at info@alcoholeducationtrust.org.

SECTION 3 – DATA BACKUP & RECOVERY PROCEDURES

3.1 Data Backup

We use 'MY Cloud' for data backup which plugs directly into the Wifi router to provide remote access. An IT consultant has configured the office computers and laptop to automatically back up to 'My Cloud' on an hourly basis. Details have been set up in Settings/Update & Security/Backup/Backup Options.

3.2 Data Recovery

In the event of an issue then data can be recovered by the IT Consultant.

3.3 Regular Reviews

On a monthly basis, the finance manager sends a reminder to ensure users conduct a manual review of the two office computers and CEO's laptop to ensure that the automatic backup process is still operational.