



PRIVACY POLICY

Introduction

At Brighter Futures Together we respect your privacy and are committed to protecting your personal information. This Privacy Policy explains when and why we collect personal information about individuals, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure in accordance with the General Data Protection Regulation ((EU) 2016/679) and, when enacted, the Data Protection Act 2018 (UK) (together referred to as the "GDPR").

Brighter Futures Together is registered as a data controller with the Information Commissioner's Office for the United Kingdom.

This Privacy Policy applies to current and former clients, including: members of our workforce (including employees and consultants, agency workers, advisers, self-employed consultants and volunteers), vendors, other third parties with whom we work and other persons.

This Privacy Policy was last updated on 5th September 2022. This policy may change from time to time, so please check this page occasionally.

By submitting your data to Brighter Futures Together you are accepting this privacy policy and authorising Brighter Futures Together to collect, store and process your information in the ways explained.

We only ask for personal information when we truly need it. We collect it by fair and lawful means, with your knowledge and consent. We also let you know why we're collecting it and how it will be used.

We retain collected information for as long as necessary to provide you with your requested service. We will protect the data we store through commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification.

We don't share any personally identifying information publicly or with third parties, except when required to by law.



We comply with the principles of the Data Protection Act in the following ways:

- We will ask your consent before using your data for any purpose other than that for which it was given;
- We will endeavour to ensure the data we hold is completely accurate and will update our database if you tell us of any inaccuracies;
- We will only collect the data we need and will not keep it longer than necessary;
- We will keep and use all data in accordance with your rights (see below);
- Any data we hold about you will be treated confidentially and stored securely.

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and practices of these sites and cannot accept responsibility or liability for their respective privacy policies.

Your continued use of our website (as a visitor to the website, or as a user of a webform to submit an enquiry or referral) will be regarded as acceptance of our practices around privacy and personal information. If you have any questions about how we handle user data and personal information, feel free to contact us at hello@brighterfuturestogether.org.uk.

You are free to refuse our request for your personal information, with the understanding that we may be unable to provide you with the response you have requested.

How your data is collected

In most circumstances, Brighter Futures Together will only ask for your name and contact details. Sometimes, we may ask for additional information where it may help us keep our communications relevant to you.

We will only collect sensitive personal data where absolutely necessary and with your explicit consent. All data collected by Brighter Futures Together will be retained only for an appropriate length of time, defined by our legal requirements and operational needs, and will be securely archived or deleted after this time.

We will also collect information such as your Internet Protocol (IP) address for monitoring and improving the effectiveness of our website services as well its security.

We use the third-party analytics services Google Analytics to gather this information for analysis. We use this information to produce aggregate visitor information activity reports, which we use to inform our website content development. For more information on Google Analytics cookies, see the official Google Analytics page.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device/computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device – please see your web browser options.



How your data is kept secure

We have put in place security measures to prevent your personal data collected from this website from being accidentally lost, used, altered, disclosed or accessed without authorisation. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

Within Brighter Futures Together, only those authorised to process your data can access your data. We work hard to ensure our staff can only see the data they need to perform their tasks. All our staff are trained to understand data protection and what they need to do to keep your data secure.

We currently host our email mailing list with Mailchimp. Mailchimp automatically place single-pixel gifs, also known as web beacons, in every email sent by Brighter Futures Together. These are tiny graphic files that contain unique identifiers that enable Mailchimp to recognize when our subscribers have opened an email or clicked certain links. These technologies record each subscriber's email address and IP address and the date and time associated with each open and click for a campaign.

Mailchimp is based outside the European Economic Area (EEA) in the U.S. We have signed a Data Processing Agreement with Mailchimp, who act as a Data Processor for Brighter Futures Together, who are the Data Controller for the mailing list.

As a processor, Mailchimp is required under contract to ensure that any data transfers outside the EEA will be made in accordance with applicable law. To achieve this, Mailchimp has certified to the EU-U.S. Privacy Shield Framework (see their certification here).

In practice, this means that Mailchimp in the U.S. is considered a "safe" recipient of personal data of its customers and their subscribers that is transferred from the EU to the U.S. by offering an "adequate level of protection" for such personal data (as determined by the European Commission). The Privacy Shield remains an adequate data export mechanism under the GDPR (see Art 45(9)).

How we collect your personal data

We collect information about you in the following ways:

- when you voluntarily give Brighter Futures Together your personal information
- when you engage with a service we offer, either directly with Brighter Futures Together, or through a third party we are working in partnership with on one of our partner projects
- when you request to participate in any of our events the information you share is used to facilitate attendance and inform you of future events
- when you make a donation via our website your information will be used to process and administer your donation

- when you apply for an advertised vacancy, we will process the personal information you provide to us as part of your application and any interview selection process
- when you offer to volunteer, we will process the information captured in the Volunteer Application to determine to which area of our service your skills will be most suited
- when you subscribe to our updates
- when you read or download information from our website (this would be such information as IP address or operating system, rather than personal identifying information)

How Brighter Futures Together protects children's privacy

The safety of children is very important to us. No information should be submitted or posted to Brighter Futures Together by children under the age of 13 without prior parental/guardian consent. If you are aged under 13, please ensure you obtain your parent/guardian's consent before sending any personal information to this website. All applicable laws are followed with respect to data collection from children.

How to find out more or to complain

Brighter Futures Together operates in accordance with all relevant UK data protection laws. If you would like to find out more about these laws and how you could be affected beyond what is mentioned in this privacy policy, please visit the [Information Commissioner's Office](#).

You have a right to ask for a copy of the information we hold about you, which Brighter Futures Together will supply to you within one month. Brighter Futures Together will ask for proof of identity and may charge a fee should any request be unusually complex or time-consuming.

If you have any specific questions about how Brighter Futures Together processes your data which are not answered here, or you would like to make a complaint about how we have managed your data, then please either write or email us via the details below.

Brighter Futures Together
4 Beaufort Gardens
Marlow
SL1 1EL

or email us at hello@brighterfuturestogether.org.uk



You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

