

Hand Of Arts and Education Charity

Privacy Policy 2018-19



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1 | What is this policy?

This page sets out the details of Hand Of's Privacy Policy, in relation to information collected about you on this website, as well as through other means including in person, by post, by telephone. We are committed to protecting and respecting your privacy. This policy explains when, how, and why we collect personal information about people who visit our website, take part in our projects, reserve or purchase tickets to our performances, and donate money to us; how we keep this information secure, and the conditions under which we may share it with others.

If you have any queries relating to our Privacy Policy, or how we use your personal data, please email: info@handof.co.uk.

2 | Who We Are

Hand Of Ltd. is an education, arts, and heritage charity, delivering projects designed to benefit some of the most disadvantaged children and young people in the UK. Our registered address is:

Hand Of Ltd.
East Farm
Kirkwhelpington
NE19 2RT

We are a registered charity no. 1175512.

We are a company limited by guarantee incorporated in England and Wales, no. 10156422.

3 | How and when we collect personal information

We collect personal information that you provide when you contact us, interact with us, or use our website. This can include when you sign up to receive e-newsletters from us via our mailing list, when you decide to make a donation to us, or when you take part in one of our projects.

We collect small pieces of information called cookies when you are using our website, to help us ensure we are providing the best possible experience for users. Please see the section on 'Cookies' below for more details.

If you are aged 16 or under, you must have your parent or guardian's permission before you provide us with your personal information. Unless you have their consent, you are not allowed to give us your information.

We collect personal information in a number of ways which include:

- When you use our website or a third party website to make a donation
- When you use our website or a third party website to sign up for a mailing list, complete a survey, enter a competition, or book tickets/attendance for an event
- When you call us by phone to make a donation, enquire about forthcoming projects, or take part in one of our projects
- When you contact us by post, such as when you submit a Gift Aid form, return a donation form, return a contact form, or return a sign up form to take part in one of our projects
- We very infrequently receive data about some customers from other sources, such as from partner organisations. Please see 'What we do with your information' for more details. In these instances, please also refer to the Privacy Policy of the organisation which is collecting your information for more guidance on how they will share your data.

Where we are working with children individually or over a sustained period of time, for example on one of our schools projects, we may need to collect additional information from the school or from a parent/guardian including, but not limited to: medical details, educational attainment, details of any learning difficulties, special access requirements. This information will be used by our staff and freelancers employed on the specific project, in order to plan and deliver the best artistic and educational experiences for participants, and to keep participants safe throughout their experience with Hand Of. This information may be passed to emergency services for use should any emergency situation arise.

Where we need to collect this information in respect of children, we will always ask schools to ensure they have consent from parents or guardians to provide the information and consent to its use for the purposes described. It may be necessary to share this information with some of our partner organisations who participate in project delivery, but that will not be done without your knowledge or permission.

4 | The types of personal information we collect

We collect and store personal information from you when we are required to do so, such as to fulfil a contract you have with us; and when you've opted to give it to us, such as to be kept informed about our work by email newsletters.

The following list of information is data we gather directly from you through this website, over the phone or by post, or through third party processors such as MailChimp, BT MyDonate, or iZettle, which is usually collected when you make a donation, sign up to our mailing list, or interact with us:

- Your title, name, and date of birth
- Your postal address and/or billing address
- Your email address and phone number
- Your place of work
- Your IP address and information on what pages you accessed (see Cookies policy below)
- Your current professional interests or activities which may be related to Hand Of's work

We will also collect and hold details of any contact you have with us as a customer or supporter of Hand Of, which may contain details of:

- contact preferences;
- your age range
- event registration, attendance, or ticket purchases;
- gifts and donation information, such as Standing Order bank details if applicable;
- Gift Aid status;
- details of correspondence sent to you and received from you by email, post, and over the phone;
- donor status and donation assessment information;
- employment information and professional activities;
- where relevant, selected media coverage concerning you, such as performance reviews or interviews (if you are an artist or partner who worked with us on a project);
- where relevant, information accessed through social media sites such as Facebook, Twitter, and Instagram (only where you have given permission for this to happen);
- any other information provided by yourself, at the request of Hand Of.

4.1 | Special Data

Some of the information which we collect from you or a third party may constitute sensitive personal data, for example data collected from a school or a parent/guardian when signing up a child to take part in one of our education projects. We will only ever use this in accordance with this policy and shall maintain strict and necessary measures to protect this information and its confidentiality.

4.2 | Taking part in one of our education projects

When an individual, a school, or a parent/guardian signs themselves or a child up to take part in a project, the info provided will be used solely for the specific project that they are participating in. Hand Of will securely hold and process the data provided to us for the purposes of joining the project, in accordance with this privacy policy, and future communication will be carried out with the person or organisation who provides us with the data. For example, Hand Of will communicate solely with the school who represents a class of pupils taking part in an education project, rather than with the parents or children individually.

When joining a Hand Of project, we will securely hold and process the data provided for the purposes of your/your child's involvement in this project, to enable us to plan and deliver the best artistic and educational experience, and, in extreme circumstances, to ensure the safety of all participants, and to contact parents/guardians in case of an emergency.

For more information on this, please read our Child and Vulnerable Adult Safeguarding Policy [<https://handof.co.uk/about/policies/>]

If you are accepted onto the project, we will use the details provided for your/your child's involvement as detailed below. After the project has ended and there is no longer a requirement to hold and process the data provided by you, we will delete this personal data within twelve months of your last engagement with Hand Of, retaining a minimum level of information necessary for our administrative records to meet legal requirements.

Please note that for certain projects it may be necessary to share information with third parties for project, reporting and research purposes. With the participants knowledge and consent from a parent/guardian, obtained by the school, necessary data will be shared securely with relevant partner organisations when planning projects, such as to ensure that specific needs are catered for. Anonymised data may be shared for use in funding applications, reporting, and evaluation.

5 | What we do with your information

Depending on your relationship with Hand Of, and the preferences you have indicated to us, the data we hold may be used by us for a number of purposes.

In general, for our customer relationships we rely on contractual necessity and legitimate interests as the legal basis for processing your personal data. We do not rely on consent as a legal basis for customer relationships, other than when we are obliged to do so in accordance with e-communications legislation (PECR 2003). For our relationships with donors and funders, we generally rely on consent and will use your most recent contact preferences to ensure we contact you only when you have asked us to, and in the ways you have told us to do so. Occasionally, we may use legitimate interests to contact you by post with relevant information, unless you have told us not to.

The purposes for which your personal data may be used includes the following:

- To fulfil a contract we have made with you, such as completing an order or reservation made online, including sending payment receipts and order updates.
- To send you promotional, marketing or fundraising information by electronic means, when you have told us you wish to receive these by opting in to our mailing list or where we have an existing customer relationship with you and we have a legitimate interest. These types of communications can include:
 - Informing you of other products, services or events related to Hand Of's work, such as forthcoming projects, upcoming concerts and events, or special offers.
 - News and updates about Hand Of and our charitable values, such as via email, newsletter, and specific marketing or supporter e-newsletters.
 - Information on our fundraising activity, including requests to consider giving financial support to Hand Of, such as through ongoing or specific project appeals, or to ask you to consider supporting us in other ways.
 - Invitations to special events, such as film screenings or project events.
 - Other relevant third-party communications, such as releases or performances by past artists, or news about past partners and venues, based upon your past and on-going relationship with Hand Of and where we have your permission to do so.
 - Surveys about our work and opportunities to be involved in market research related to Hand Of.
- Additional research, to help us understand our customers, donors and potential donors, including gathering information from publicly available resources to give an insight into your philanthropic interests and ability to support Hand Of. See How we analyse your data for further information.
- Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an e-newsletter from us is opened and/or

how many links are clicked within the message. The data from this tracking is generally used in an anonymised form through MailChimp.

You can opt out of all our communications at any point simply by clicking the 'unsubscribe' button on the bottom of any email which we send to you. Alternatively, you can update your contact preferences for each type of mailing you receive by clicking the link which appears alongside 'unsubscribe'. You may also make this request by contacting us directly by emailing info@handof.co.uk.

There are some essential donation and transaction communications that we are required to send to you, regardless of your contact preferences. This would include Standing Order and Direct Debit payment confirmations, donation receipts and thank you letters, up to two renewal reminders, Gift Aid confirmation letters, and querying any bounced payments. If you have told us you do not wish to be contacted, these are the only communications we will have with you. You will not receive our newsletters or event invitations unless you update your communication preferences.

6 | How we analyse your data

We may use anonymised purchase or reservation information of tickets to our events to carry out statistical analysis of our engagement.

We may segment the information we hold about you in our database based on your previous purchase history or interactions with Hand Of's work. These segmentations are carried out using personal data collected at the point of sale, as well as how engaged with us you have previously been, and any indicators of future engagement. Analysis of this helps us understand our customers, donors and potential donors to ensure we are efficient, and that only relevant communications are sent to you. We will not send you any communications which you have opted out of.

We may very occasionally carry out analysis and further research on a small number of our customers and donors. This may include the appointment of an external party to undertake additional research based on information we currently hold, as well as from publicly available information such as the Charity Commission and Companies House, to better understand how we can evolve our future relationship with you. Any such arrangements will be subject to a formal contracted agreement between Hand Of and that external partner, and will protect the security of your data.

By making a donation or purchasing or reserving a ticket, our legitimate interest allows Hand Of to analyse your personal data in the above ways. You can opt-out of your data being used for further analysis, with the aims of targeting communications with you appropriately, at any time, simply by contacting info@handof.co.uk

7 | Who we might share your information with

Your data will never be sold to any third party or external organisation for any purpose and will only be shared or passed to a third party on a temporary basis in order to provide an essential service (see examples below). Any third party with whom data has been shared in this way will be contractually required to ensure your data is secure, and will not be retained once that service has been fulfilled. Whilst Hand Of is responsible for the safety of your data, we are not responsible for the privacy policies and practices of other organisations or websites, even if accessed using links through our website. It is recommended that you check the policy of each external website you visit and contact them directly if you have any concerns or questions.

Examples of such purposes and the companies we work with include:

- BT My Donate or CAF Donate, for the processing and storage of Direct Debit information for regular donations set up and made through their website
- iZettle, for the processing of credit and debit card information for one-off and recurring donations or purchases
- Google and Facebook, in order to identify similar customers to our audience, or to provide personalised advertising through third party websites. The data which is shared with these advertisers, through visiting our website, is anonymised to protect your personal information.

8 | How we store your personal information

We have robust security measures in place to protect the personal information that we have under our control, and to protect it from unauthorised access or improper use. Data you share with us through our website is encrypted, and stored on secure hard drives. We do not store any payment information ourselves. All Hand Of employees who have access to, and are associated with the processing of data, are legally obliged to respect the confidentiality of our customers' and donors' personal information.

The personal information you share with Hand Of when reserving or purchasing tickets or making a donation, may be transferred to countries outside the European Union and European Economic Area, such as if the computer servers for third party processing companies are based in the USA. If we transfer your data in this way and outside of the EU/EEA, we will take all necessary precautions to maintain your privacy rights and protect your information as we have outlined in this privacy policy.

For companies based in the USA, Hand Of will only transfer data through or to organisations who have signed up to the EU Privacy Shield. More information about this initiative and how it protects your data can be found via their website: www.privacyshield.gov.

We will retain your personal information on our IT systems only for as long as is reasonably necessary in order to carry out the purposes set out in this privacy notice, and to fulfil our legal obligations. We will not keep more information than we need. The retention period will vary according to the purpose we are holding your information for, however in general we will store your data for up to five years from the date of your last interaction with us e.g. the last time you purchased or reserved tickets, requested information from us, made a donation, or attended an event. After five years, we will remove all personal data we hold on you, except for the bare minimum we need to keep such as your name and donation history. Please contact us using the contact details at the bottom of this notice should you wish to find out more about how long we will keep your information.

Our current IT systems for storing personal data include the following programmes and documents, which are all encrypted and password protected. Those with two-step authentication are clearly identified.

- Google G Suite (two-step) (including Docs, Sheets, Drive, Forms, Gmail)
- DropBox
- Microsoft Office (including Microsoft Word, Excel)
- Apple iWork (including Pages, Numbers, Keynote, Mail)
- Manager Accounting Software
- Mendeley

- LibreOffice
- macOS and iOS

If you ask us to stop sending direct marketing communications to you, we will only keep the minimum amount of information required to ensure we adhere with such requests, such as your name. If you exercise your right to be forgotten, we will ensure that your personal information is removed from our database, except where our legal obligations require us to retain it (such as with Gift Aid claims). In these instances, we will retain the minimum information necessary, and for the legally required length of time only.

9 | How you can access the information we store about you

You can ask us at any time if we are keeping any personal information about you and you can also request to receive a copy of that data – this is called a Subject Access Request.

To make a Subject Access Request you will need to provide adequate proof of identity such as a copy of your passport, birth certificate or driving licence before your request can be processed.

There may also be a fee of up to £10, depending on the volume of work required. Please try to be as clear as possible about the information you are seeking, so we are able to process your request as quickly as possible.

Once we have received your Subject Access Request, the agreed fee, and proof of identity, you will receive a response from us within 28 days and you will be able to get electronic copies of any information we hold on you. However, exemptions to disclosure may apply in some circumstances, and are explained in further detail by the Information Commissioners Office website: <https://ico.org.uk/for-organisations/guide-to-data-protection/exemptions/#subject-access>.

Subject Access Requests should be sent to:

Hand Of Ltd.
East Farm
Kirkwhelpington
NE19 2RT

Email: info@handof.co.uk.

At any time, you may request that we delete or correct your personal information. If you wish to correct any information on you held by Hand Of, simply contact us using the details above.

10 | Cookies

In order to make the Hand Of website easier to use and improve our service, we sometimes place small pieces of information on your computer. These are known as cookies and they are used by most major websites. Hand Of currently uses cookies when you visit this website; these are listed below. To find out more, please visit the links to access information on each company's use of cookies. You can reject the use of cookies by going to the settings section of your web browser, however please note that this may limit your use of this website and some key functionality.

Google Analytics:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Twitter: <https://help.twitter.com/en/rules-and-policies/twitter-cookies>

BT MyDonate: <https://www.btplc.com/mydonate/aboutmydonate/Privacypolicy/>

euCookie: This is a WordPress plug-in that generates the orange banner that you'll have seen at the top of the page, asking for your permission to store cookies on your computer. It stores a cookie to stop the banner reappearing, once you've clicked 'Okay'.

11 | Changes to our privacy policy

We regularly review this privacy policy, and may make changes throughout the year. Any changes made will be posted to this page, and will apply from the time we post them. This privacy notice was last changed on 14 November 2018 and is due to be reviewed on or before 14 November 2019.

12 | How to contact us

If you have any comments on our privacy policy, or any of the personal information we hold about you which are not covered by the points above, please contact us:

- by email to info@handof.co.uk
- or writing to us at Hand Of Ltd, East Farm, Kirkwhelpington, NE19 2RT