

## External Supporters' Privacy and Data Protection Policy

Reviewed: October 2024  
Next Review date: October 2026  
Approved by CEO & Board Trustees

The Matthew Project ("TMP") is committed to protecting the privacy of funders, supporters, visitors to our online communications (website, newsletter, social platforms), volunteers, job applicants (and prospective job applicants), and those who donate to TMP ("External Supporters"); being transparent, accountable, and respectful of their personal information.

### Policy Aims

The External Supporters' Privacy and Data Protection Policy (the "Policy") aims to:

- inform External Supporters how TMP collects, uses, shares, and looks after their personal data;
- describe why and how TMP collects and uses personal information during and after External Supporters' connection with TMP; and
- set out TMP's data processing practices and the rights of External Supporters and options regarding the ways in which their personal information is collected and used.

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### Who we are

TMP is a registered charity that supports people across Norfolk, Suffolk, Essex and Cambridgeshire. The organisation empowers young people and adults to overcome problems with drugs, alcohol, and mental health.

The support given by our External Supporters is vitally important in helping us provide the services we do. We appreciate that they share our passion for working with those who are affected by drugs and alcohol to help make a difference. Their support in raising funds, running campaigns, events and activities is key to our success.

Our Values:

- **We hope**, believing that lives and relationships can be transformed.
- **We empower**, actively engaging with people to help them reclaim their sense of purpose and expand their choices in life.
- **We care** for the whole person, paying attention to safety and well-being through warm, professional relationships.

To enable us to carry out that work, TMP may need to use your personal information. When we do, we are the processor of that information. We have a duty of care and an obligation under data privacy law relating to how we use your personal information.

### Data Protection Principles

- 1) **Lawfulness, fairness and transparency** - We want to be clear, open and honest from the start about who we are, and how and why we use your personal data.
- 2) **Purpose limitation** - Personal data is collected only for valid purposes that are clearly explained to you and not used in any other way.
- 3) **Data minimisation** - We will only hold adequate and relevant information on you that is sufficient for fulfilling its purpose.
- 4) **Accuracy** - We will take reasonable steps to ensure the accuracy of any personal data in the form of periodical checks.
- 5) **Storage limitation** - We will only hold personal data for as long as we need it.
- 6) **Integrity and confidentiality (security)** - We have appropriate security measures in place to protect your personal data. This includes, and is not limited to, two-step authentication, different levels of security roles, cyber security, organisational policies, physical and technical measures.
- 7) **Accountability** - We have policies and procedures in place, regular staff training and we keep a general record of processing.

### Personal data we collect

Personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed and anonymised. We will clearly ask for your consent for us to keep your personal data. We get this personal data from you directly. If you were to register online, volunteer, take part in an event, contact us, or interact with us in any other way, TMP may ask you for personal data.

We may collect, store and use the following personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.

- Business contact details such as name, title, job title, addresses, telephone numbers and business email addresses.
- Date of birth or age.
- Equality, Diversity and Inclusion questions (special category data, including gender, sexuality, ethnicity). These questions are voluntary and are there to help us monitor equality across our organisation.
- Photo/Video recording – This can be at an activity or an event. We have a sign-in process at our Oak Street Centre that gives the option to capture a photo when visitors sign-in and we have CCTV throughout the premise to monitor health and safety for all those that access our site.
- We will keep details of TMP activities and events you have attended.
- Details of any financial payment or donation you have made will be kept securely as part of our financial procedures.

### Why we collect it

We strive to build a good relationship with each of our funders, supporters, donors and other professionals; we want them to feel connected with The Matthew Project, to feel valued, to have an excellent experience and to be well informed about the positive impact they are making. This will in turn, help us to generate income and enable us to continue to deliver our service.

### How we use it

TMP will only use your personal data as detailed in the table below. We will keep personal data confidential and will not disclose it to any third party without your consent, unless we are obliged to do so by law, or it is necessary to process information on their behalf, e.g., providing details to process online donations.

We consider the grounds listed below to be relevant:

How we use your personal data	Grounds for using your personal data
To provide you with services, products or information you have requested	Legitimate interests Consent
To analyse different sources of income	Legitimate interests
Processing a donation that you have made. This can include claiming gift aid on donations and for auditing purposes	Legitimate interests Legal obligation Consent
Maintaining databases of supporters and volunteers	Legitimate interests Consent
To administer and record donations and funding on databases for auditing purposes	Legal obligation Contractual obligation
To inform supporters and donors of service updates, upcoming activities and events (marketing purposes)	Legitimate interests Consent
Sending communications to which you have subscribed	Consent

To help donors to promote their fundraising activities by e.g. sending press releases to the media	Consent
Responding to correspondence you have sent us	Legitimate interests
To thank donors and supporters	Legitimate interests
Helping us monitor your ongoing consent for information.	Legitimate interests
To process your application for a job or volunteer role with us	Contractual obligation Legal obligation
For security monitoring (reporting incidents to the police and providing evidence), and health and safety (building evacuation)	Legitimate interests Legal obligation
Sign-in data of visitors to The Hub, including photo images	Legitimate interests Consent Vital interests
CCTV monitoring and recording	Legitimate interests
To provide a service (e.g. training, catering)	Legitimate interests Consent

Please note that we may process your personal data without your knowledge or consent in compliance with the above “Grounds for using your personal data”, where this is required or permitted by law.

### **Opt-in and Removing Consent**

TMP will ask you to “opt-in” for communications. This enables you to choose how we communicate with you. You should contact us and let us know how you would like to receive communications from us.

You can withdraw your consent at any time by clicking the “unsubscribe” link or by emailing [publicity@matthewproject.org](mailto:publicity@matthewproject.org). If we are asked to stop sending marketing information, we will update our records to stop further mailings as quickly as possible. However, you may still receive further mailings which were already in progress before you asked us to stop.

We will only use your personal data for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### Data Security - Who has access to it

Your personal data, collected by TMP, will be held securely either on paper and/or electronically.

TMP uses reasonable measures to safeguard any personally identifiable information. We have put in place appropriate security measures to prevent the personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to the personal data to only those staff who have a legitimate business need to have access to that data.

Due to the nature of servers and cloud-based storage all over the world, this may mean that, during the processing of data, it leaves the European Economic Area (EEA). Although they may not be subject to the same data protection laws as in the UK, we will take steps to ensure they provide an adequate level of protection in accordance with UK data protection law. By submitting personal data, you are agreeing to this potential transfer, storing, or processing at a location outside the EEA.

### Data Retention - How long we keep it

We will hold personal data no longer than is necessary and in accordance with the law. At regular intervals, we will:

- review the length of time we keep personal data for;
- consider the purpose or purposes for which we hold personal data for in deciding whether (and for how long) to retain it;
- securely delete information that is no longer needed for that purpose or those purposes; and
- update, archive or securely delete information if it goes out of date.

All records will be disposed of in a secure manner. Paper records will be disposed of by way of confidential waste and electronic records will be irretrievably deleted.

Retention Schedule	
Type of information on record	Retention period
Information connected to donations - not including those who have expressed interest in leaving a gift to TMP	7 years since the last donor's gift
Supporters' personal data (individual or business)	7 years since the last donor's gift
Records of Donors expressed interest in leaving a gift in their Will to TMP	Retained until they expressly state that they will not be leaving the gift and are also not actively engaging with the charity in other ways, OR until 7 full financial years have been since our notification of their death
Information required for the purpose of legacy gift administration	Retained for 7 years after the date the file was closed and 12 years after the date the file was closed for any disputed legacies. Will Trust files remain open until all income distributions have been received, and then will be deleted 7 years after closing of the file. Where an Indemnity has been provided by TMP, then that legacy record must

	remain open for a period of 7 years following the expiration of the Indemnity period
Gift Aid Records	Retained for 7 years from the donor's last gift
Sign-in data of visitors to The Hub, including photo images	Retained for up to 30 days
CCTV recordings	Retained for as long as capacity allows before overwriting, generally this is 20-30 days, unless there is a compelling reason to retain further, e.g. as evidence for an incident - until the resolution of the incident.
Volunteer Records	Retained for 6 years after the volunteer ceases to volunteer for TMP

### Third Party Websites

Our website also makes use of session **cookies**. Small text files that are placed on your hard drive and are necessary for site functionality, they provide a better user experience by retaining user preferences, store information like shopping carts, and provide anonymised tracking data to third party services like Google Analytics. They contain no personally identifiable information. They are deleted when the browser is closed. For more information about cookies, including how to block or delete them, visit [www.AboutCookies.org](http://www.AboutCookies.org).

The Matthew Project website (<https://www.matthewproject.org>) uses a third-party service, **Google Analytics**. They collect anonymous traffic data, visitor behaviour patterns, where the visitors to the site have come from, and the browser and operating systems used. This information is stored by Google and subject to their privacy policy. We do not allow Google to make any checks to try and identify the visitor.

TMP website may include links to other external websites, e.g., our Facebook and X (formerly Twitter) pages. These links are provided for convenience to provide further information.

For third party sites, we encourage you to read their privacy policies as our policy does not cover them.

We use a third-party application, **Mailchimp**, to deliver our e-newsletter. We gather statistics around email opening and user clicks. For more information, please see Mailchimp's privacy notice here: <https://www.intuit.com/privacy/statement/>

### Images

Anyone who engages with our services, events and activities may have images taken of them whilst participating. When we take images, we will always advise you of this and give you an opportunity to opt out. We may use these photos in our marketing materials.

We will only publish these photos with your consent. If you do not wish your photo to be used, you should contact us. We will only publish photos of children and young people with parental consent.

### **CCTV Monitoring at The Hub (70-80 Oak Street, Norwich, NR3 3AQ)**

TMP's CCTV system is a Network Video Recorder which is managed by TMP and has appropriate security in place to ensure this information is only shared with those who need access to it. CCTV footage will be:

- stored on-site in our server room (not backed up); and
- stored for as long as capacity allows before overwriting - generally this is 20-30 days.

There are no legal requirements in the UK regarding the retention of CCTV footage. However, in accordance with Police recommendations, we will ordinarily keep CCTV footage for no longer than 31 days, unless there is a compelling reason to retain it further. This data is kept according to our Data Retention Schedule.

### **Reception Sign-in**

If you visit our centre, The Hub, there is an electronic sign-in system. It collects your name, company, vehicle registration, details of who you are visiting, details of any assistance required in case of evacuation and your picture (optional).

We are responsible for this information; it is stored on a cloud, and we have appropriate security in place to ensure this information is only shared with those who need access to it, by having a local network system so that only those with permission can access it on site. This data is kept according to our Data Retention Schedule.

### **Exercising your Rights**

Under data protection law, you have rights including:

- **The right of access** - You have the right to ask us for copies of your personal data. If you want to access your data, you can do this face-to-face, by email, on the telephone or by letter. It would be helpful to know the description of the information you want to see and proof of your identity may be needed. We will respond within one month.
- **The right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **The right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.
- **The right to restrict processing** - You have the right to object to the processing of your personal data in certain circumstances.
- **The right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent.

Although you will not usually need to pay a fee to exercise your rights, TMP reserves the right to charge a fee if the request involves a long, time-consuming process.

To make a data protection rights request, please contact us by email: [dataprotection@matthewproject.org](mailto:dataprotection@matthewproject.org) or by post, at our address; 70-80 Oak Street, Norwich NR3 3AQ.

### **Changes to this Policy**

We may update this Policy from time to time and place the updated policy on our website.

### **How to complain**

If you have any concerns about our use of your personal data, you can contact our team on [dataprotection@matthewproject.org](mailto:dataprotection@matthewproject.org).

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>