TRANSFORM Drug Policy Foundation

Privacy policy

NB: This policy also applies to the Anyone's Child website (<u>www.anyoneschild.org</u>) and the activities of the Anyone's Child campaign.

Overview

www.transformdrugs.org is a website operated by Transform Drug Policy Foundation

Transform Drug Policy Foundation is a registered charity and a company limited by guarantee. Anyone's Child is a campaign of Transform.

Transform takes the privacy of our beneficiaries, supporters and volunteers very seriously. Every reasonable effort is taken to ensure that your information is kept secure and intact. This policy describes how we collect and use personal information about the people who visit our websites or provide personal data over the phone, face-to-face, and in writing. It also states how and why we use data, how we store it and how individual personal preferences can be amended.

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By using our website, you are accepting and consenting to the practices described in this policy. If you have any queries about this policy please contact:

info@transformdrugs.org

Directing your email to the Data Protection Officer

Transform is fully committed to complying with the principles set out in the General Data Protection Regulation, 2018 (GDPR) and has a legal duty to protect any information we collect from you. In summary:

- Only information that we need to carry out our charitable purposes is collected.
- Your personal information is only used for the purpose for which we collect it.
- Your personal information is only seen by those who need it to do their jobs.

We will only disclose data with your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the GDPR (through contract; legal obligation, vital interests; public task; or legitimate interests).

We will keep your information up to date. Inaccurate or misleading data will be corrected as soon as possible.

Personal information is retained only for as long as it is required for the purpose collected (normally a maximum of 7 years). Unless there is a legal requirement to do otherwise, after six years we will take steps to remove your information from our records.

Your information will be protected from unauthorised or accidental disclosure and processed in an appropriate manner to maintain its integrity and confidentiality.

We will provide you with a copy of your personal information on request (please see below for information on access rights and requests).

These principles apply whether we hold your information on paper or in electronic form.

How do we collect information?

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails.

We obtain personal information from you when you enquire about our activities – including fundraising and trading – register with us, send or receive an email, make a donation to us, ask a question or otherwise provide us with personal information. We may also receive information about you from third parties, for example from mailing list brokers.

We will only ever collect the information that we need to carry out our work.

What information do we collect?

The personal information we collect might include name, date of birth, email address, postal address, telephone number and credit/debit card details.

We also gather anonymised information about the use of our website, such as which pages users visit most often, and which are of most interest. We may also track which pages users visit when they click on links in Transform or Anyone's Child emails. Please see the section on Cookies.

Why do we collect this information?

We collect this information for the purpose of communicating effectively and appropriately with our supporters and carrying out our charitable work. The lawful basis for which we process your information is:

- With your explicit and knowing consent
- If necessary for the performance of a contract to which you are a party.
- If necessary for compliance with our legal obligations, for example to comply with our obligations as an employer to disclose employee salary details to HMRC
- If necessary to protect your interests or that of another person
- If necessary for the performance of a task carried out in the public interest
- If necessary for the purpose of the legitimate interest pursued by us or a third party, except where your rights as a data subject override our legitimate interest. The legitimate interest we rely upon is subject to an assessment based on the specific context and circumstances.

How do we use this information?

- We will use the information you provide in the ways set out below:
- Promote the aims of Transform Drug Policy Foundation
- To communicate with our supporters, dealing with your enquiries and requests, recording any contact with you
- To provide you with information that you have indicated an interest in, for example information about our campaigns, volunteering, fundraising and trading activities and how you can donate to us

- We may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users
- To claim Gift Aid on your donations

Do we share your information with anybody else?

- We share your personal information with our suppliers, who we engage to process data on our behalf. In such cases information is only shared for the purpose of providing services on our behalf relating to communications, or agreements between yourself and Transform. Such processing is conducted under relevant Data Processing Agreements.
- We also may need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.
- We do not sell personal details to other charities or other third parties.
- Our websites may include links to websites run by other organisations. Transform is not responsible for the privacy practices of these other websites so you should read their privacy policies carefully before sharing any personal or financial data.

Storing and protecting your information

We place great importance on the security of all personally identifiable information. We have security measures in place to protect against the loss, misuse and alteration or destruction of personal data under our control. Information is stored by us on computers located in the UK. We may also store information on paper files. We use a secure server when you make a donation or payment via our website.

We will keep your information only for as long as we need it to provide you with the information you have required, to administer your relationship with us, to inform our research or the preferences of our supporters, to comply with the law and tax accounting rules, or to ensure that we do not communicate with people who have asked us not to.

When your information is no longer required, we will always dispose of it securely.

Your Rights

You have a right to object to Transform processing your personal information ('right to object') at any time where we rely on our legitimate interests for doing so. Such a request must be sent to the Data Protection Officer at the above address.

You also have a right to object to our processing your data for the purposes of marketing. You have a choice about whether you want to receive information about the Charity's work and fundraising and trading activities. We aim to make it easy for you to tell us how you want us to communicate in a way that suits you. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted.

You have a right to ask us to confirm whether we are processing information about you, and to request access to this information ('right of access'). Please contact us at the address above if you wish to do so.

You may ask us, or we may ask you, to rectify information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, we will inform relevant third parties with whom we have shared your data so they may update their own records.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You should note that we are entitled to and reserve the right to retain your data for statistical purposes. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.

You have a right to ask us to restrict our processing of your information ('right to restriction') if

- You contest its accuracy, and we need to verify whether it is accurate
- The processing is unlawful, and you ask us to restrict use of it instead of erasing it
- We no longer need the information for the purpose of processing, but you need it to establish or defend legal claims
- You have objected to processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.
- You exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

If you would like to exercise any of your rights above, please contact the Data Protection Officer at our address.

Cookie policy

The Transform and Anyone's Child websites use cookies and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalise the website and to ensure you see content that is relevant to you. Cookies help us to provide you with a better experience by allowing us to understand what areas of the website are of interest to our visitors (e.g. via Google analytics).

Most browsers will allow you to turn off cookies. Please note however that turning off cookies may restrict your use of our website. To learn more about cookies and how to manage them, visit AboutCookies.org (http://www.aboutcookies.org/).