

Privacy Notice of Signal (Sensory Impairment Globally, Nationally & Locally)

Introduction

Signal is a charitable company limited by guarantee with registered charity number 1151615 (England & Wales) and registered company number 08451864 (England & Wales).

We are the charity working to end the isolation and stigma of people with deafness and hearing loss in the UK and Africa through greater access to health and wellbeing services, education and learning.

At Signal we are committed to respecting your privacy and protecting your personal information. This Privacy Notice explains how we will collect, hold and use the personal information that you give to us or that we receive from others about you. It also explains your rights over your personal information.

We will never share your information with any other organisations for their marketing purposes.

If you have any questions about this Privacy Notice, then please do contact us by post, email, telephone or text message:

Privacy Officer
Signal, 8a College Hill, Shrewsbury, Shropshire, SY1 1LZ
Email info@signal.org.uk
Telephone 01743 364 644 (Monday-Friday, 9am-5pm)
Text message 07950 782 819

This Privacy Notice includes:

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2. What personal information we collect
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1. Why we collect and use personal information

We collect personal information from you as our supporters, volunteers, service users and other stakeholders to help us to interact with you in the most positive and efficient way and to fundraise for our life-changing projects and deliver our services as effectively as possible.

Examples of why we may use your personal information include:

- To keep you updated on our work and the difference that your support makes.
- To make fundraising appeals.
- To inform you about events and activities in which you can participate as a supporter or volunteer.
- To organise participation in Signal events and activities.
- To provide you with the information, services or products that you have requested.
- To manage your marketing and contact preferences.
- To administer your donation or other payment, including processing Gift Aid, legacies and raffles.
- To keep a history of your support, including donations that you have made.
- To keep notes of your interactions with us as a reference should you wish to revisit these.
- To share your story as a supporter, volunteer or service user, when you have agreed to this.
- To invite you to participate in voluntary surveys or research.
- To carry out equality monitoring.
- To carry out internal analysis, including to improve the efficiency of our fundraising communications, website and online advertising and our services.
- To comply with our legal and regulatory and contractual obligations.
- To contact you as the representative of a group or organisation.
- To process a job or volunteering application that you make to us.

2. What personal information we collect

The personal information that we collect about you will depend on why and how you interact with us. This information may include:

- Your full name and title, postal address, email address, telephone number(s) and, where relevant, date of birth, age and gender.
- Your marketing and contact preferences – for which purposes you wish to be contacted, by which method(s) and when you gave us this information.
- Your bank account details to set up a regular donation by Direct Debit, your cheque details to pay in a donation by cheque, your debit or credit card details to take a donation or other payment by card, and your taxpayer status to claim Gift Aid. We will use your bank or card details solely for the purpose of administering your donation or payment through our trusted processor, the Charities Aid Foundation (CAF), and then securely destroy these details.

- Details of financial and in-kind donations that you have made to Signal and events and activities in which you have participated.
- Details of your requests to us and interactions with us by post, email, telephone, text message, voice and video call and social media and in person.
- Other relevant information about you that you share with us, including your interests, affiliations with community groups, occupation and employer.
- Your story, photograph and video image as a supporter, volunteer or service user, when you have agreed to this.
- Your survey or equality monitoring responses (this information is anonymised and aggregated).
- Your curriculum vitae to process your job or volunteering application.

3. How we collect personal information

We may collect information about you directly whenever you interact with us. For example, you may give us your personal information when you:

- Contact Signal through different channels about our projects, events, activities and services.
- Sign up to receive news on our projects, fundraising and volunteering activities and services through our paper or website forms. Please note that, when you sign up to our news or make an enquiry through our website forms, we also receive your IP address.
- Engage with our social media.
- Make a donation to Signal.
- Make a purchase.
- Meet with us, participate in our events, activities or services, or fundraise on our behalf.
- Complete a survey or an equality monitoring form.
- Make a job or volunteering application.

We may also receive personal information about you from third-party organisations, if you have given them your permission to share your information with us. For example, we may receive information about you when voluntary or public sector organisations refer you to Signal's activities or services, or when you donate to Signal through online fundraising platforms or donations management organisations, including Charities Aid Foundation, Everyclick and Charities Trust.

4. Our legal bases for processing personal information

Often our legal basis for processing your personal information will be the basis of consent. This is where you have provided your consent to allow us to use your information in a certain way, for example, by filling out our paper or website forms to receive marketing communications from us, including our newsletter and fundraising appeals. When you have consented to receiving marketing communications, we will usually aim to ask you to renew your consent two years after your last meaningful interaction with us.

We may also process your information where we are pursuing our legitimate interests to raise funds and achieve our charitable objectives. We will only do this where we have assessed that this processing is not likely to be too intrusive, or to unduly infringe on your rights and freedoms.

For example, we may further our legitimate interests by sending you a thank you letter for your donation, or by carrying out some profiling activity to help us to understand how best to manage our resources. This profiling includes analysing and segmenting the information that we hold, so that we can understand who our supporters are and contact them about specific activity, such as, an event happening in their geographical area or corresponding with their interests.

Where we rely upon the basis of consent to process your personal information, you can change or withdraw this consent at any time, by contacting us (<https://www.signal.org.uk/contact-signal/>), or by clicking on the “update preferences” or “unsubscribe” buttons on emails which we send to you using an email distribution service, for example, MailChimp. Please also contact us, if you do not wish us to use your information to carry out profiling activity.

In some cases we have a legal or statutory obligation to process personal information. We may also process your information where this is necessary in order to fulfil the terms of a contract with you.

5. Sensitive information

Some personal information is legally considered to be sensitive and so is subject to additional protections. This information is known as “special category data” and is classed in the following way:

- Race
- Ethnic origin
- Political opinions
- Religion or philosophical beliefs
- Trade union membership
- Genetics
- Biometrics (where used for identification purposes)
- Health
- An individual’s sex life
- Sexual orientation

Additional protections also apply to personal information relating to criminal convictions and offences.

We will only collect, hold or use this type of information when there is a specific reason for doing so. We will explain this reason to you when we ask for the information and will usually ask for your explicit consent to use it. For example, if you participate in our services around deafness, hearing loss and tinnitus, we may ask you for health information

concerning these conditions as part of the delivery of these services. Of, if you participate in one of our events or activities, we may ask you for health information to help us to ensure your safety during the event or activity, such as, your accessibility needs or dietary requirements. We have measures in place to protect your sensitive information and its confidentiality.

6. Children's information

We do not actively collect personal information from supporters under the age of 18 years, and the minimum age for engaging with Signal as a volunteer is 16 years.

Where appropriate, we will ask for consent from a parent or guardian to collect information about children. Signal events and activities will have rules on whether or not children can participate, and the collection of information will be managed according to each event or activity, with appropriate safeguards in place.

We also have memoranda of understanding with our project partners in Africa, who have child safeguarding policies in place.

Where we use children's photographs and information for case studies and publicity, we will ensure that we have the appropriate consent.

7. How we work with third parties to process information

We will never share your information with any other organisations for their marketing purposes.

Please be aware that we may disclose your personal information, if:

- We are required to do so by law, for example, to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation. This may be in a situation where we need to safeguard a vulnerable person.
- It is necessary to protect the vital interests of an individual.
- We have obtained your consent.
- The transfer is to a secure data processor that carries out data processing operations on our behalf, for example, a mailing house that distributes our newsletter. Processors acting on our behalf process your information in accordance with our instructions and comply fully with data protection laws.

We can accept donations to Signal by Direct Debit and/or debit and credit card through the Charities Aid Foundation (CAF)'s online fundraising platform, CAF Donate. CAF Donate will collect and further process your payment information directly, when you navigate to CAF's secure website via Signal's website. In this case, Signal will not handle your bank or card details.

Alternatively, we can collect your payment instruction and information from you and submit it to CAF Donate on your behalf through a password protected area of CAF's secure website. In this case, we will use your bank, debit or credit card details solely for the purpose of setting up the Direct Debit or making the one-off card payment through CAF Donate, and we will then securely destroy these details.

We can accept payments for products by debit or credit card when the card holder is present through the SumUp point of sale (POS) system. SumUp will collect and further process your payment information directly through its system. Signal will not handle your card details.

CAF Donate (<https://www.cafonline.org/navigation/footer/privacy>) and SumUp (<https://sumup.co.uk/privacy/>) both comply with the Payment Card Industry Data Security Standard (PCI DSS) and have privacy policies in place.

Transfers of data outside of the European Economic Area (EEA)

We use Microsoft Office 365 products (<https://privacy.microsoft.com/en-gb/privacystatement>) for our internal office use. This means that internal documents and information generated by us are stored in cloud services hosted within the EEA. In some limited cases, we use data processors that process and/or store data outside of the EEA, for example, email distribution service, MailChimp (<https://mailchimp.com/legal/privacy/>). MailChimp participates in and has certified its compliance with the EU-US Privacy Shield Framework.

8. For how long we keep your personal information

We will keep and securely dispose of your information according to our internal policies and will keep it no longer than is reasonable and necessary for the purposes for which we hold it, taking into account relevant legal and regulatory obligations and operational considerations.

For example, if you have opted in to the Gift Aid scheme, then we will keep a record of your Gift Aid declaration and donations for at least seven years to comply with HMRC requirements.

If you request that we stop sending you marketing communications, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

If you apply for a job or volunteering role with Signal and are unsuccessful or do not take up the role, then we will keep your information on file for a period of six months.

9. Your rights over your personal information



building deaf friendly communities

Your privacy and personal information are protected by legislation in the UK and European Union:

General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679);

Privacy and Electronic Communications (EC Directive) Regulations (PECR) 2003.

If you would like to discuss or exercise any of your legal rights over your personal information, then please do contact us at Signal: <https://www.signal.org.uk/contact-signal/>. Please be aware that there are certain circumstances in which these rights may not apply, and when this is the case, then we will explain this to you.

Rights for individuals under data protection legislation include:

Right to be informed

This Privacy Notice informs you about how we will collect, hold and use your personal information. You may also see messages on some of our forms that explain why we ask for specific information from you.

Right of access

You have the right to request a copy of the personal information that we hold about you and other supplementary information. This is known as a subject access request. Please be aware that we will take reasonable measures to confirm your identity, before we disclose any information.

Right to rectification

If you believe that any of the information that we hold about you is inaccurate or incomplete, then please do contact us so that we can investigate this and make any appropriate corrections.

We really appreciate you letting us know if your contact details change, as this helps us to keep your information up to date.

Right to erasure (right to be forgotten)

You have the right to request that we delete the information that we hold about you. Please be aware that there are certain circumstances in which we may need to keep your information, for example, to comply with another legal obligation. When this is the case, then we will explain these circumstances to you.

Right to restrict processing

You have the right to request that we restrict the processing of your information, so that we keep the information but stop using it, when there is an investigation into its accuracy or lawful use, or when we no longer need the information but you require us to keep it to establish, exercise or defend a legal claim.

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Right to data portability

You have the right to request a copy of certain information that we hold about you digitally in an appropriate format to facilitate its easy and safe transfer to another organisation in certain circumstances.

Right to object

You have the right to object to our processing of your personal information on the basis of legitimate interests, including profiling activity, and for the purposes of direct marketing.

Signal is registered with the UK Fundraising Regulator and we will also respect any wishes that you express through the Fundraising Preference Service (<https://www.fundraisingregulator.org.uk/the-fundraising-preference-service/>) not to receive direct marketing communications from Signal by post, email, telephone, and/or text message.

Rights related to automated decision-making including profiling

You have rights to avoid being subject to a decision that is based solely on automated processing of personal information (including profiling) and has a significant effect on you. Signal does not carry out such processing.

How to raise a concern

If you have any questions or concerns about Signal's collection, storage or use of your information, then please do contact us (<https://www.signal.org.uk/contact-signal/>), so that we can provide you with an informative response and/or carry out an investigation.

The Information Commissioner's Office (ICO) is the UK regulator which upholds information rights. The ICO issues guidance about individual rights that is available on its website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

You have the right to make a complaint directly to the ICO, and you can contact the ICO and report a concern using the methods shown on its website: <https://ico.org.uk/global/contact-us/>. The ICO's helpline telephone number is 0303 123 1113 and its textphone number is 01625 545 860.

10. How we keep your personal information safe

We take appropriate physical, technological and managerial measures to keep your personal information secure and accurate, to only keep your information for as long as is reasonable and necessary, and to dispose of your information securely.

We store information in paper files and electronically on computers and our server in the UK, and our websites are hosted in the UK. Our measures to protect personal information
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include locking away paper files, restricting access to electronic data through passwords and network segmentation, keeping virus and malware protection up to date, carrying out security reviews on our network, and using encryption technology on our websites. We ensure that only appropriately trained staff, volunteers or contractors who need to access your information can do so.

While we do take appropriate measures to protect your information electronically, the transmission of information over the internet is never completely secure. So, we cannot guarantee the security of any information that you disclose to us online, and you should understand that you do so at your own risk.

11. Our use of cookies

Signal's websites, like most websites, use cookies. These are small data files that are downloaded from a website to your device while you browse to make the site easier to use. We use cookies to ensure that you see the correct content on our websites, to get a better overall idea of how people use our websites, and to help us to improve the user experience.

This includes using cookies to compile visitor statistics through Google Analytics (<https://policies.google.com/privacy>). Visitor statistics tell us how many people have visited our websites, what type of technology they are using, how long they spend on our sites, what page they look at, how they reached our sites and whether they have visited our sites before. Using these cookies does not allow us to identify website users personally – the information that is gathered is anonymous to us.

Please see our cookie policy on our website: <https://www.signal.org.uk/cookie-policy/>.

We also receive anonymous, aggregated statistics about visitors to our social media pages through Facebook Insights (<https://en-gb.facebook.com/policy>) and Twitter Analytics (<https://twitter.com/en/privacy>). This helps us to understand how people are engaging with our posts and to improve our content for our audience.

12. Changes to this Privacy Notice

We may update this Privacy Notice from time to time, for example, to reflect any relevant changes in legislation and regulation or in Signal policy. The date of the most recent update will appear here.

Please do revisit this Privacy Notice on our website periodically to keep up to date with changes which may affect you. If we make any significant changes to this Privacy Notice, then we will clearly publicise these changes on our website or we may notify you directly.

This Privacy Notice was last updated in May 2018.