



## SHERBORNE FOOD BANK

### DATA & PRIVACY POLICY | COOKIES POLICY

Sherborne Food Bank [SFB] values your privacy and aims to always demonstrate transparency and fairness in the collection and use of personal data. SFB will, through appropriate management and strict application of criteria and controls, adhere to the principles of the Data Protection Act 2018 [DPA 2018] and UK General Data Protection Regulation [UK GDPR]. This is our Data & Privacy Policy:

#### WHAT IS PERSONAL DATA UNDER THE UK GDPR?

The UK GDPR applies to 'personal data' meaning any information relating to an identifiable person ('data subject') who can be directly or indirectly identified by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people. The UK GDPR applies to both automated personal data and to manual filing systems where personal data is accessible according to specific criteria.

#### WHO DOES THE UK GDPR APPLY TO?

- The UK GDPR applies to processing carried out by organisations operating within the UK. It also applies to organisations outside the UK that offer goods or services to individuals in the UK.
- The UK GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household activities.

SFB is committed to protecting your privacy and will process any personal data in accordance with current Data Protection Legislation. In this policy we explain how and why we collect your information, what we do with it and what controls you have over our use of it.

From time to time, we will add or change functions, features or products to our website or add or change services. This, and our commitment to protecting the privacy of your personal

information, may result in periodic changes to this Data & Privacy Policy. As a result, please remember to refer to this policy regularly to review any amendments. Any questions regarding our Data & Privacy Policy should be directed to [help@sherbornefoodbank.org](mailto:help@sherbornefoodbank.org)

## **DATA CONTROLLER**

A data controller is an organisation that determines the purposes, conditions, and means of the processing of personal data. SFB is a data controller, for the purposes of operating its charitable activities [Reg. Charity No. 1156481].

SFB is registered to process personal data with the Information Commissioner's Office (ICO), Registration No. ZB290178. Visit [www.ico.org.uk](http://www.ico.org.uk) for further details. The Data Protection Officer (DPO) for SFB can be contacted at [help@sherbornefoodbank.org](mailto:help@sherbornefoodbank.org)

## **DATA PROCESSOR**

A data processor is an organisation that processes personal data on behalf of the controller. Third party processors with which SFB collaborates includes, but is not limited to, providers of: IT, accounting systems, file sharing/storage systems, contracted appliance manufacturer/repair services, transport/courier services, marketing/advertising services and referring agencies.

## **ACCEPTANCE OF THESE PRIVACY TERMS**

By using our website [www.sherbornefoodbank.org](http://www.sherbornefoodbank.org), you unconditionally agree to be bound by this Data & Privacy Policy.

## **WHY DO WE COLLECT DATA?**

SFB collects and processes information about you online in order to;

- (i) identify your device, browser/operating system to enhance your web experience
- (ii) improve our services and website

You may be asked for information about yourself, such as your name, e-mail address, postal address and telephone number when you attempt to contact us. You are under no obligation to provide this information, but if you don't then we may not be able to provide you with the best service.

## **LOG FILES/IP ADDRESSES**

When you visit our website, we automatically log your IP address (the unique address which identifies your computer, or mobile device, on the internet) which is automatically recognised by our web server. We use IP addresses to help us administer our website and to collect broad demographic information. Non-personal information about you is used to collect such information as the type of internet browsers used, the site from which you linked to our websites or the type of device you are using to access our website. You cannot be

identified from this information and it is only used to assist us in providing an effective service on our website.

## HOW DO WE USE PERSONAL DATA?

SFB uses your data for the following lawful basis and purposes:

- To enable our charity to respond to referrer/recipient enquiries and contacts about the provision of our food bank services as advertised in print and online at [www.sherbornefoodbank.org](http://www.sherbornefoodbank.org) and associated social media platforms. In addition to enquiries, referrals and contacts, including those received through phone calls, emails and post; or in response to e-newsletters/online, print advertising and social media.
- To enable provision of food bank services according to referrers' or recipients' instructions, or the instruction of a nominated representative (for instance a Power of Attorney or guardian).
- To advise or remind recipients about their food bank deliveries.
- To maintain records detailing SFB services accessed by recipients.
- To instruct third parties and volunteers, where appropriate, who may be assisting SFB in the provision of food bank services/deliveries.

We will keep your personal data on our secure systems for a maximum of five years unless you request removal or transfer according to your rights under the UK GDPR.

## ONLINE DONATIONS

Our donations partner online is JustGiving and payment are made securely to them via links from our website. To see JustGiving's own Terms & Conditions, visit <https://www.justgiving.com/about/info/terms-of-service>

## SECURITY

SFB stores data on a number of trustee/volunteer-held computers located in the UK, and via a password-protected Google drive.

Our SSL-compliant website and email system is hosted by Tsohost, via its UK headquarters, which operates from high-security global data servers.

SFB places a great importance on the security of all information associated with our users. We have security measures in place to protect against the loss, misuse and alteration of any user data under our control.

For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to user information. Regarding our website, we use secure server software (SSL) to encrypt financial information you input before it is sent to us. While we cannot ensure or guarantee that loss, misuse, or alteration of data will not occur, we use our best efforts to prevent this.

We operate a 'safe file' system in our offices and site locations and our volunteers are fully trained in data security. This applies to all recipient details and contacts whether securely stored in physical files or held on desktop/hand-held devices. Non-essential paperwork is routinely shredded and recycled.

SFB will not disclose personal information to a third party unless we believe it is lawful to do so. We will not pass on personal details to anyone outside the SFB organisation for marketing purposes. There are some particular circumstances however where the law allows SFB to disclose data without the data subject's consent:

1. Carrying out a legal duty as authorised by an appropriate legal officer.
2. Conducting any legal proceedings, obtaining legal advice, or defending any legal rights.
3. Where there is a 'legitimate interest', such as preventing abuse of the SFB system by recipients.

SFB places great importance on the correct treatment of personal information and recognises that this plays a key part in retaining the trust and confidence of those with whom we work and serve. We will strive to ensure that personal information is always treated lawfully and correctly.

## **YOUR RIGHT TO INFORMATION**

You have the right to a copy of the information we hold about you. This is known as a subject access request. For more information on this, please visit: <https://ico.org.uk/for-the-public/personal-information/>

## **YOUR RIGHTS UNDER THE UK GDPR**

Unless subject to an exemption under the UK GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which SFB holds.
- The right to request that SFB corrects any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for SFB to retain such data.
- The right to withdraw your consent to the processing of personal data at any time.
- The right to request that the data controller provides the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data.
- The right to lodge a complaint with the Information Commissioner's Office (ICO).

## **OUR DATA RETENTION PERIODS**

**SFB recipients:** Your personal information is stored in a secure database for five years.

**People who donate food to SFB:** Where you provide personal information alongside your food donation, your personal information is stored in a secure database for two years.

**People signing up to an SFB campaign:** Your personal information is stored in a secure database for up to two years.

**Financial donors:** Your personal information is stored in a secure database for seven years.

**SFB Volunteers:** If your application to become a volunteer is successful, we maintain your personal details for the duration of your period of volunteering, plus an additional twelve months after you stop volunteering.

If your application to become a volunteer is unsuccessful, your information will be deleted immediately.

**Representatives of referral agencies:** Data is stored for two years after the date of the last referral made.

**Representatives of other local food banks:** Data is stored for twelve months after the last connection.

**Complainants:** Data is stored for six years if the complaint is upheld by the ICO, three years if the complaint is not upheld.

## COOKIES POLICY

### Use of Cookies

Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about your activity on a website. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. However, you may not be able to take full advantage of a website if you do so. First party cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Third party cookies are added by scripts added to the website, including via social media platforms. Although cookies identify a user's computer IP, cookies do not personally identify customers or passwords. Credit card information is not stored in cookies.

### How do you change your cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

Our website contains links to the sites of third parties. When you visit these sites, we suggest that you read their privacy policies. SFB is not responsible for the privacy policies or the content of such sites. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

## Social Media

SFB also maintains a presence on social media channels such as Twitter and Facebook.

If you share content from one of SFB's social media websites, a cookie may be used by the service you have chosen to use to share that content. SFB does not control these cookies. You should check the relevant third-party main website for more information.

Please e-mail any questions, concerns or comments you have about cookies to [hello@sherbornefoodbank.org](mailto:hello@sherbornefoodbank.org)

## CONTACT DETAILS

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer at [help@sherbornefoodbank.org](mailto:help@sherbornefoodbank.org)

Or write to: Sherborne Food Bank, c/o St Paul's Church, St. Paul's Close, Sherborne DT9 4DU

Contact the ICO on t: 0303 123 1113/email: <https://ico.org.uk/global/contact-us/email/> quoting our registration No. ZB290178 or write to: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

