

## **SOS Privacy Policy**

### **Introduction**

This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulations (GDPR) which is EU wide and far more extensive, seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.

This privacy policy sets out how SOS NI uses and protects any information that you give SOS NI.

SOS NI is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy policy.

### **Legal basis for processing any personal data**

To meet SOS NI's obligations to support service users and provide you with the services, products or information you have requested, for administration purposes and to further our charitable aims, including for fundraising activities. Your consent to these services is the legal basis for processing. We will not pass your details to other organisations without your prior consent, unless required to do so by law. For example, we reserve the right to provide your personal details to HM Revenue and Customs (HMRC) for Gift Aid purposes if appropriate.

### **Legitimate interests**

We have a number of lawful reasons that mean we can use (or process) your personal information. One lawful reason is something called 'legitimate interests'. Broadly speaking Legitimate Interests means we can process your personal information if:

- We have a genuine and legitimate reason.
- and*
- We are not harming any of your rights and interests.

### **How do we collect information?**

We collect your personal information in a number of ways:

- When you provide it to us directly.
- When you provide permission to other organisations to share it with us (including Facebook or Twitter).
- When we collect it as you use our websites or apps.
- When you have given it to a third party and you have provided permission to pass your information on to us.

When providing permission for third party organisations to share your data you should check their Privacy Policies carefully to understand fully how they will process your data.

## **What we collect**

We may collect the following information with consent:

- Names, addresses, emails, phone numbers and other contact information;
- Demographic information such as postcode, preferences and interests
- Financial information;
- Information about someone's health;
- Photographs, video and audio recordings.

## **What we do with the information we gather**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- We may use the information for statistical purposes which will be anonymised.
- We may use the information to improve our services.
- We may periodically send promotional emails about events, newsletters and other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for research purposes. We may contact you by whatever means you have consented to e.g. email, phone, or mail. We may use the information to improve the website according to your interests.

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website ensure you read the form in its entirety and are confident of what you are consenting to e.g. volunteering opportunities, notification of events, digital magazine, newsletter etc.

We will not sell, distribute or lease your personal information to third parties.

## **Consent**

Through agreeing to this privacy notice you are consenting to SOS NI processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [info@sosbusni.com](mailto:info@sosbusni.com) if or by phoning 02890 664505 or writing to us at SOS NI, Bridgewood House, 48 Newforge Lane, Belfast BT9 5NW.

## **Retention Policy**

SOS NI will process personal data during the duration of any service user engagement or for the period of one month. If consent is given to retain information to receive further notifications e.g. events, updates, newsletters, volunteering SOS NI will process personal data until consent is withdrawn. SOS NI will continue to store only the personal data needed.

## **Volunteering**

When you volunteer with SOS NI, we will keep you up to date with the work that we are doing and events we are involved with. We will also let you know of any changes that might affect you volunteering with us and which you need to be aware of. We will only use this information in relation to your volunteering with us and whilst you remain a volunteer with SOS NI. By agreeing to volunteer with SOS NI you are agreeing to us sending you emails about volunteering and your volunteer role. We will on occasion share your email address with other SOS NI volunteers, for instance in the process of organising an event you have chosen to attend.

## **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## **Data storage**

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

## **Your rights as a data subject**

At any point whilst SOS NI is in possession of or processing your personal data, all data subjects, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

In the event that SOS NI refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

## **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **SOS NI at your request can confirm what information it holds about you and how it is processed**

You can request the following information:

- Identity and the contact details of the person or organisation (SOS NI) that has determined how and why they process your data.
- The purpose of the processing as well as the legal basis for processing.
- The categories of personal data collected, stored and processed.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- The source of personal data if it wasn't collected directly from you.

- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

**To access what Personal data is held**

SOS NI will take reasonable steps to verify that the person making the subject access request is the data subject (e.g. ID verification check). If SOS NI is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to [info@sosbusni.com](mailto:info@sosbusni.com) or by phoning 02890 664505 or writing to us at SOS NI, Bridgewood House, 48 Newforge Lane, Belfast, BT9 5NW.

**Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by SOS NI, you have the right to complain to SOS NI's Chief Executive. If you do not get a response within 30 days, you can complain to the ICO. The details for each of these contacts are:

**SOS NI**, attention of the Chief Executive, Bridgewood House, 48 Newforge Lane, Belfast, BT9 5NW.  
Email [info@sosbusni.com](mailto:info@sosbusni.com) or by phoning 02890 664505

**ICO** – Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB  
Telephone: 028 9027 8757 / 0303 123 1114 Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)