



SWVG PRIVACY POLICY

For staff, members, volunteers, friends, donors including applicants and other people who do not use our services

This Privacy Policy applies to personal information that SWVG holds about you, if you do *not* use our services.

The Southampton and Winchester Visitors Group (SWVG) needs to hold certain personal information (data) so that we can fulfil our charitable purposes. We know that it is important to keep your information safe and private.

The Privacy Policy explains:

- What types of personal information we hold, how we use it and how we keep it safe.
- The “lawful basis” for holding this information and whether we need your consent.
- The circumstances in which we may need to share this information with other organisations.
- How we delete your information when it is no longer needed.
- Your rights about your personal information.

“**Personal Information**” is any information about an identifiable living person.

“**Processing**” of personal information includes such things as collection, storage, use, or otherwise making available, restriction, erasure or destruction.

SWVG contact details

If you have any comments or questions about this policy, please email the SWVG Administrator at info@swvg-refugees.org.uk; or contact the SWVG Privacy Representative



Privacy Notice: this Privacy Policy is also sometimes called a Privacy Notice and is required by UK law.

SWVG Privacy Representative: our representative on privacy matters is Christine Holloway.

Purposes

We collect and use peoples' personal information only so far as we consider it necessary to carry out our activities to fulfil the overall Objects stated in SWVG's constitution and the particular purposes listed in Schedule A below.

Lawful Basis

The "lawful basis" for processing your personal information depends on each particular purpose and is one of the following:

Consent	You have given clear consent for us to process your personal information for specific purposes.
Contract	The processing is necessary for a contract we have with you.
Legal obligation	The processing is necessary for us to comply with the law.
Legitimate interests	The processing is necessary for our legitimate interests or the legitimate interests of a third party.

Consent

SWVG members, friends and trustees are asked to sign a general consent form for the relevant purposes listed in Schedule A below.

Specific consent by non-members is to be requested and recorded for some particular purposes listed in Schedule A below.

Who can see your personal information?

Within SWVG the people who have access are those who need it to carry out their particular role within SWVG.

Sharing your information with other organisations

Schedule A lists the circumstances in which certain types of information may be shared with other organisations.

Information used in SWVG publicity and reports

If SWVG wants to include any personal information in publicity and reports that could be used to identify you then this will only be done if you consent.



Photographs

SWVG will not publish a photograph of you unless you give your consent in writing. If a photograph has already been published with your consent, then it may not be possible to remove it.

How we store your personal information

SWVG takes reasonable steps to ensure that your personal information is kept securely and is protected from unauthorised access, use or disclosure.

SWVG stores information on computer in our cloud-based password-protected IT systems (e.g. DropBox, Gmail). Information on paper is stored securely.

SWVG staff and members are required to keep information secure. For example, any smart-phone, laptop or computer should be protected by a password.

How long we keep your personal information

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

At the end of this time, personal information held on computer will be securely deleted. Personal information on paper will be shredded unless we can give it back to you.

Where personal information is collected on the basis of consent, we will seek renewal of your consent at least every three years if we can contact you.

Rights you have over your personal information

Your rights include:

- You have the right to see your information.
- Where data processing is based on consent, you may withdraw this consent at any time.
- You have the right to ask for information to be corrected and/or erased.
- You have the right to complain to the Information Commissioner if you feel your rights have been infringed. Please discuss your complaint with SWVG first and we will try to resolve it (see SWVG Complaints Policy).

A summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please speak to the SWVG Administrator or to the SWVG Privacy Representative.



References

This policy has been prepared with reference to guidance provided in:

- The Information Commissioner’s website Guide to the General Data Protection Regulation (GDPR): <https://ico.org.uk/>
- General Data Protection Regulation (GDPR): A guide for charities: <https://cfg.org.uk/>

Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify people whose personal data we hold and are affected.

Version control

		Notes
This version number	1.1	
Author/owner	Christine Holloway	
Date(s) of previous version(s) (if any)	not applicable	Previous policies were very different
Date approved	18 November 2019	
Who approved it (normally trustees, but minor changes may be by owner or relevant Group)	Trustee meeting.	
Date due for review	Dec 2021	
Added to website? (date)	18 Feb 2020	
In weekly news? (date)	March 2020	
Discussed at general meeting? (date)	6 April 2020	



SCHEDULE A: types of information, purposes, lawful basis			
Information Type	Purposes	Lawful Basis	Circumstances for sharing
Members (and applicants)			
Applications for membership	Process membership applications	Legitimate Interest	Contacting referees
DBS checks	Vetting applicants	Legal Obligation	Communication with UK Government's Disclosure and Barring Service
Member's bank details and records of expenses payments claimed and made	Financial accounting and efficient payment	Legal Obligation	Financial audit
List of members with contact details	(i) Record of key information necessary to operate SWVG (ii) to enable Members to contact each other	Legitimate Interest	An individual name, phone number and/or email address shared with person using SWVG services and/or third party occasionally when needed to assist a person using SWVG services.

SWVG PO Box 1615 Southampton, SO17 3WF

Email: admin@swvg-refugees.org.uk **Telephone:** 0750 317 6350 **Web:** www.swvg-refugees.org.uk



Internal emails (which may sometimes contain Special Category information)	To exchange information needed to operate SWVG. Special Category information on a need-to-know basis only.	General Consent	When needed for SWVG activities.
Visitors			
List of members of each SWVG visitor support group	Enable administration of SWVG visitor support groups	Legitimate Interest	When needed for SWVG activities.
List of trustees, their application forms, declarations of interest, etc.	Enable administration of trustees and comply with charity law	Legal Obligation	Legal obligations
Staff and applicants for employment			
HR records such as contracts, references, application forms, and grievance or disciplinary records	Compliance with employment law and good practice	Legitimate Interests (applicants) Contract (staff)	Legal obligations
Payment records and bank details	Financial accounting and efficient payment	Legal Obligation	Legal obligations
People who attended an event (for each event)			

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List of attendees	SWVG records	General Consent	When needed for SWVG activities.
Donors (individuals as well as organisations)			
List of donors, contact details, donation details and other relevant information	SWVG fund raising and financial accounting	Legal Obligation	Financial audit
Friends			
List of Friends; Newsletter mailing list	To communicate with Friends of SWVG	General Consent	When needed for SWVG activities.
Photos			
Members and staff; also sometimes speakers at events, people involved in campaigning activities	For use (subject to specific consent) in SWVG newsletters, website or other publications.	General Consent (Members and staff) Specific Consent (non-Members)	Publicity and reporting
Third Parties			

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People in organisations with which SWVG has contracts including owner of hostel; suppliers e.g. of stationery; printers (includes their contact info; payments made to them; correspondence with them about orders/delivery)	In order to manage our contract requirements.	Legitimate Interests	Financial audit
People who speak at events	Contact details and introductory personal information and notes relating to the event.	Specific Consent	Publicity and reporting
Officials with whom SWVG has communications e.g. at Home Office, doctors, solicitors.	Contact details and notes relating to the communications.	Legitimate Interests	When needed for SWVG activities.