

# Privacy Policy

## How this policy applies

This Privacy Policy describes the information we collect from you, how we use that information and our legal basis for doing so. It specifically describes the types of information we may collect from you or that you may provide when you use our website at [www.winchestersalt.org](http://www.winchestersalt.org) ("Website"), or our services (collectively, "Services") and our practices for collecting, using, maintaining, protecting and disclosing that information. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the imported data from authorized and approved sources.

By using Winchester SALT's Website and Services, you are acknowledging that you have read and understand this privacy policy. If you do not agree with our policies and practices, you may choose not to use our Website or our Services.

## What data do we hold?

In order for you to use Winchester SALT's Services we need to collect and process certain information.

If you attend an event organised by Winchester SALT or join the Winchester Community Sport Alliance, we will need to record your name, and we may collect other information and contact details as necessary. We may also need to record whether or not you represent a particular organisation or group. This information is known as "personal data". Personal data provided to us will be used for the purpose that we will explain clearly when we collect the data and in accordance with any preferences you express.

Your activities and involvement with Winchester SALT will result in personal data being created. We may also record information about how Winchester SALT's services are used, in the form of numbers of participants and the type of activities they undertake. We may also keep records of charitable donations. If you volunteer with Winchester SALT, we may need to collect data to enable us to fulfil our responsibilities to you as a volunteer, which include, but are not limited to, your name, age, email address, telephone/mobile number and details of your emergency contacts.

This Privacy Policy also applies to any information we collect:

- In email, text and other electronic messages between you and us.
- As personal data that you provide to us, such as your name and e-mail address, if you register on our Website (including by "following," "liking," linking your account to our Website etc., on a third-party website or network).
- Automatically as you navigate through our Website. Information collected automatically may include usage details, IP addresses and information collected through

cookies, web beacons and other tracking technologies on the NationBuilder™ platform that hosts our Website. NationBuilder's privacy policy can be found [here](#).

We use the NationBuilder™ platform to organise our community of members, supporters and prospects. You can read more about that company and its features and policies at [www.NationBuilder.com](http://www.NationBuilder.com). When you visit our Website, NationBuilder may send one or more cookies – a small text file containing a string of alphanumeric characters – to your computer that uniquely identifies your browser and lets NationBuilder help you log in faster and enhance your navigation through our Website. A cookie does not collect personal information about you. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of our Website may not function properly if the ability to accept cookies is disabled.

NationBuilder integrates social media application interfaces or plug-ins ("Plug-ins") from social networks, including Facebook, Google+, LinkedIn, Xing, Twitter, Instagram, Tumblr, Pinterest and/or possibly other companies, into our Website. In order to register as a user with us, you may have the option to sign in using your Facebook or other social media site ("SMS") login.

For example, when you visit our Website or platform, the plugin creates a direct connection between your browser and the Facebook server. This allows Facebook to receive information about your visit to our Website or platform with your IP address. If you click the Facebook "Like" button while you are logged on to your Facebook account, you can link the contents of our Website or platform to your Facebook profile. This allows Facebook to assign your visit to our Website or platform to your user account. Please note that as provider of the Website or platform, we receive no notification about the contents of the transmitted data or their use by Facebook. If you do not want Facebook to assign your visit to our Website or platform to your Facebook user account, please log out of your Facebook user account.

If you do so, you authorize NationBuilder to access certain SMS account information, such as your public SMS profile (consistent with your privacy settings in SMS), your email address, interests, likes, gender, birthday, education history, relationship interests, current city, photos, personal description, friend list, and information about and photos of your SMS friends who might be common SMS friends with other users. Plug-ins may transfer information about you to the Plug-in's respective platform without action by you. This information may include your platform user identification number, which website you are on, and more. Interacting with a Plug-in will transmit information directly to that Plug-in's social network and that information may be visible by others on that platform. Plug-ins are controlled by the respective platform's privacy policy, and not by our Privacy Policy. You can find the privacy policy for a platform on their website.

If you correspond with us by email, we may retain the content of your email messages, your email address and our responses. We may also retain any messages you send through our Website or through our social media accounts. You may provide information to us in user content you post to our Website or to our social media accounts, profiles, pages or groups.

## How we use this information

We hold this information to enable us to run Winchester SALT and to provide you with information and services in our role as a small registered charity.

We will act upon your choice of how you want to receive communications by email and/or by telephone/text.

By providing us with your email address (including by “following,” “liking,” linking your account to our Website, etc., on a third party website or network), you consent to our using the email address to send you Website-related notices, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity on our Website to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages, such as newsletters, changes to features of our Website, or other information. If you do not want to receive such email messages, you may opt out via the “unsubscribe” link within the message.

Following termination or deactivation of your account on our Website, we may retain your profile information and user content for a reasonable time for archival purposes. Furthermore, we may retain and continue to use indefinitely all information (including user content) contained in your communications to other users or posted to public or semi-public areas of our Website after termination or deactivation of your account. We also have the right to delete all of your personal information and other data after termination of your account without notice to you.

We reserve the right, but have no obligation, to monitor the user content you post on our Website. We reserve the right to remove any such information or material for any reason or no reason, including without limitation if in our sole opinion such information or material violates, or may violate, any applicable law or to protect or defend our rights or property or those of any third party. We also reserve the right to remove information upon the request of any third party.

We have records of how any charitable services we provide are used. As a registered charity we may need to share this information with the Charity Commission or potential sponsors of Winchester SALT or for the purposes of applications for grants. Information may be collected, anonymised and aggregated to help us deliver our charitable activities and to help us raise funds.

### **Lawful basis**

We only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulations / UK Data Protection Act & Privacy of Electronic Communications Regulation. Our lawful basis to collect and retain personal data includes:

- To comply with the law; for example, for the health and safety of participants in community events
- Our legitimate interests in running Winchester SALT as a small registered charity
- Your consent to us contacting you by email, telephone, text or other means.

## How this information is shared

We will not share any personal data with third parties. However, we do reserve the right to disclose personal data when we believe that we are obliged to do so to comply with the law or law enforcement, to prevent fraud or abuse, or to protect Winchester SALT's legal rights or the safety of its volunteers. For example, if asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data.

Winchester SALT hosts its website on the NationBuilder platform. We use NationBuilder because it has SSL encryption and it helps us to connect with local people and other supporters of our work. NationBuilder's privacy policy can be found [here](#). If you have created a NationBuilder profile, you control this and can edit it, or ask NationBuilder to erase it by emailing [privacy@nationbuilder.com](mailto:privacy@nationbuilder.com). Winchester SALT has no control over whether or how your profile or other data may be shared by NationBuilder.

## Security and Retention of data

We will securely store your personal data, i.e. your name, email address, phone number and organisation (as appropriate). We will retain this information as necessary for the purposes of this Privacy Policy and where applicable to meet any of our legal obligations. We may retain aggregated anonymised information (but not personal data) indefinitely to support Winchester SALT in its operations as a small registered charity.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website or Services, you are responsible for keeping this password confidential. You should not share your password with anyone. You must prevent unauthorised access to your account and personal data by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. The information you share in public areas may be viewed by other users.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do try to protect your personal data, we cannot guarantee the security of your personal data transmitted to us or which we obtain. Any transmission of personal data is at your own risk. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

**IMPORTANT NOTICE:** Our Website is hosted on the NationBuilder platform located in the United States, which has different data protection laws from those of other nations, and particularly member nations in the European Union. Due to differing laws and legal practice, be aware that law enforcement agencies in the United States may have access to the personal data you post to our Website on the NationBuilder platform. If you use our Website, you acknowledge and consent to NationBuilder collecting, transmitting, and storing your personal data in the United States.

## **Your rights and the Data Protection Authority**

We want you to remain in control of your personal data. You may request a copy of the personal data that we hold, i.e. details of your name, email address, phone number, organisation, and/or any other personal data that you have provided to us. You may also ask to access, rectify or erase your personal data. To do so, please email [info@winchestersalt.org](mailto:info@winchestersalt.org)

If you have any questions or concerns about the data held by Winchester SALT, please contact us. Please note that you also have a right to contact the Data Protection Authority in the UK, which is the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## **Children**

Children and young people under the age of 18 have extra protection under the Data Protection laws. We are under a duty to ask volunteers under the age of 18 to provide us with confirmation that their Parent (or Guardian) has given their consent to them being notified by email.

We will comply with any restrictions on data relating to children and young people under the age of 18, and in doing so we continue to comply with our privacy policy as a whole. For example, we will ask for parental consent to take photographs of any children or young people under the age of 18 participating in a closed (i.e. not public) event.

## **Changes to the privacy policy**

Winchester SALT may from time to time make changes to this policy to ensure it remains up to date and reflects how and why we use your personal data and new legal requirements.

*Version: ratified 20/01/20*