

# Privacy Policy

This privacy policy relates to personal information that The 3 Pillars - Feeding The Homeless & Supporting The Community (St James), collects and uses. In this policy 'we' means The 3 Pillars - Feeding The Homeless & Supporting The Community (St James).

The 3 Pillars - Feeding The Homeless & Supporting The Community is an independent charitable organisation based in Peterborough.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.

The 3 Pillars - Feeding The Homeless & Supporting The Community is a data controller.

We have policies, procedures, and training in place to help our team understand their data protection responsibilities and follow the principles of data protection.

We have a nominated member of staff who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email [Jo Silvestre at jofofinhabradley@yahoo.co.uk](mailto:jofofinhabradley@yahoo.co.uk).

## How and when we collect personal information

We may collect your personal information from you directly when you:

1. Communicate with us for any reason, by post, telephone, text, email or social media
2. Fundraise for, or donate to The 3 Pillars - Feeding the homeless and supporting the local community
3. Access food bank
5. Participate in a survey or research
6. Work or make an application to work or volunteer with us
7. Agree to help us promote our charity
8. Take part in our participation work as an expert by experience to advocate for change
9. Interact with us as a supplier, contractor, consultant, or in any other capacity.

## The personal information that we collect

We only collect personal information that we genuinely need.

This may include:

- Contact details such as name, address, email address, and phone numbers
- Date of birth
- Gender
- Nationality
- Any information that you give us relating to your circumstances and why you use a food bank
- Information that you provide when you donate food at a food bank
- Information you provide when you correspond with us
- Information you provide when interacting with our social media
- For volunteer applicants:
  - contact details for you, and any next of kin
  - information concerning your health and medical conditions
  - details of unspent criminal convictions.

## Our legal basis for processing personal information

Our legal basis for processing personal information is usually for our legitimate interests, if we have your consent, or to meet our legal obligations.

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced, and does not unduly impact your rights.

Usually, we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe someone's life is at risk.

We may process personal information because we are legally obliged to do so to meet charity laws.

## **Why we collect personal information**

We collect and use personal information about people who access our food bank, people who support The 3 Pillars - Feeding The Homeless & Supporting The Community (St James) and volunteers for a number of reasons.

### **Assisting people that access our food bank**

We collect personal information about you if you visit our food bank. Our legal basis for using this information is our legitimate interest, and where appropriate your explicit consent. We use this information to respond to your need for help, and ensure that we are providing help when and where it is most needed. We use anonymised statistical data (information that cannot be used to identify you) to campaign for funding.

### **Processing donations**

If you kindly make a food donation, a financial donation to us, or donate goods to us, we will use your personal information to collect your donation and maintain a record of our supporters. Our legal basis for using your personal information for this purpose is to fulfil our legal obligations, and our legitimate interest in meeting our fundraising objectives. We are legally required by HMRC to collect some personal information if you choose to gift aid your donation.

### **Dealing with complaints and appeals**

If a complaint is raised with us, we will process any personal information provided to manage and resolve the complaint or appeal. This may include sharing relevant information (including contact information) with the person that the complaint has been made about. Our legal basis for using personal information for this purpose is legitimate interest.

If you make a complaint about an individual and this forms part of their personal data and the individual requests access to it, we will seek to remove personal information identifying you first. In some situations, we may be obliged to provide your personal

data. We will seek your consent before providing the information but may be required to provide this even if you do not consent.

## **Promoting our cause**

We work alongside people who have lived experience of poverty and destitution to raise the profile of our cause. We will use personal information that you share with us if you agree to help us promote our cause. This might include photographs and videos. For example, we may use your information in case studies and stories that we publish or share with the media. We will seek to anonymise your information wherever possible and will only use your information for this purpose if you have given your consent for us to do so.

## **Carrying out surveys and research**

If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. Survey results are anonymised before being shared or published. Our legal basis for using your personal information for this purpose is for our legitimate interests, or where appropriate your consent.

## **Volunteer Management**

If you apply to be a volunteer with The 3 Pillars - Feeding The Homeless & Supporting The Community (St James) your personal information will be used to process your volunteering registration.

We use statistical and aggregate information about volunteers to help develop and improve people's experiences of volunteering, for equalities monitoring purposes, and to evidence the impact of volunteering.

## **Undertaking safeguarding activities**

When necessary, we process relevant personal information about employees and volunteers for safeguarding purposes. This might include a CCPAS safeguarding self-declaration form for a position requiring a disclosure; undertaking DBS; and other checks to identify any criminal and other activity we need to be aware of. It

may be necessary to share some personal information with relevant authorities such as the police. Our legal basis for this processing is to meet our legal obligations and this will be completed through the Diocese of Peterborough.

## **Governance**

We process relevant personal information about existing and potential trustee members for governance purposes. This might include checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees. Our legal basis for this processing is to meet our legal obligations with the Charity Commission.

## **Health, safety and security**

We will process limited personal data about attendees, whether those attendees are contractors, volunteers, or members of the public. We do this to ensure the health and safety of people inside the building as well as the security of the building and its contents. Our legal basis for this processing is our legitimate interest.

## **Sharing personal information**

We will only share your personal information where we need to, where someone's life is at risk or we are required to do so by law.

Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

## Your rights

You have the right to:

- Ask us for a copy of your personal information. There are some exemptions, which mean you may not always receive all the information we process.
- Tell us to change or correct your personal information if it is incomplete or inaccurate.
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a negative and disproportionate impact on you.

For all requests please contact us at [jofofinhabradley@yahoo.co.uk](mailto:jofofinhabradley@yahoo.co.uk) We will respond to any request within 28 days.

Please note that we may be entitled to refuse requests where exceptions apply; for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

## How long we keep your personal information

We will hold your personal information only for as long as is necessary. We will not retain your personal information if it is no longer required.

A summary of our retention periods is available below.

People who need help from a food bank

Your personal information is stored in a secure database for six years from the date you last accessed support.

Financial donors	Your personal information is stored in a secure database for seven years from the date you last donated.
Volunteers (inc. people engaged in our participation projects)	If your application is unsuccessful, or if you stop volunteering, your information will be held for twelve months unless we're obliged to keep it longer. In which case, we only keep necessary information.
Survey and research participants	Twelve months after the survey is completed. Then results are anonymised.
Promoting our work through sharing your story, photographic images and videos	Up to five years after consent was obtained.
Complainants	Six years if the complaint is upheld, three years if the complaint is not upheld.

## Changes to this policy

This Privacy Policy may change from time to time. We recommend that you visit this webpage periodically to keep up to date with the changes in our Privacy Policy.

This policy was last updated on 15 April 2024.

## Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way that is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.