

Sexual Abuse and Incest Line ("SAIL") 12 Soresby Street Chesterfield S401JB - Privacy Policy

Privacy Policy

We take your privacy seriously and are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it, as well as telling you about your privacy rights and how the law protects you.

Please use the Glossary at the end of this policy to understand the meaning of some of the terms used in this policy.

If you use our services, make any enquiries with us, or submit information to us whether in person, via a third party or by using any website we may from time to time operate you will be asked to confirm whether you accept and consent to the practices described in this policy. This includes any enquiries you make about our services, ongoing matters or any employment vacancies we may also advertise whether that communication is made face-to-face, via post, via telephone, via email, via the website or any other electronic means, in each case you will be asked to confirm whether you accept and consent to the practices described in this policy.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

1. Who are we?

Sexual Abuse and Incest Line ('SAIL'). References to 'we', 'us' or 'our' in this Privacy Policy means SAIL and references to 'you' or 'your' means the person who is reading this notice.

For the purpose of the Data Protection Act 1998 (the "Act") and the EU General Data protection Regulation ("GDPR"), the data controller is Sexual Abuse and Incest Line ('SAIL').

2. How Do We Collect Your Personal Information?

We collect personal information in a few different ways, including:

- When we provide services, counselling and advice to you;
- When we liaise with you;
- When you provide us with information by filling in forms including any application forms or information collecting forms;

- When you make enquiries about our services, ongoing matters or employment vacancies;
- When you complete surveys, feedback or evaluation forms that we may from time to time use for research and development purposes;
- When we collect your data from third parties such as clients, other agencies or social workers or other professional service providers.

3. What Personal Information Do We Collect From You?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes residential address, business address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details of services you have purchased from us, or enquired about.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.
- **Professional Data** includes job title, qualifications, professional experience and current or previous education.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

An example of what we might collect is:

- name, contact number, GP's surgery
- we ask for address, some people are not comfortable giving this information or may not give permission to be contacted in writing.
- Clients may offer an email address.
- That the client identifies as a survivor of childhood sexual abuse or sexual violence
- If Sail can assist in any way, i.e. mobility issues etc.

We also collect, use and share **Aggregated Data** such as statistical, demographic, or technical data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) this may be necessary and required for the services you have requested that we provide to you or so that we have all the information needed to assess what assistance you may or may not need and what we can or cannot offer to you or sign post you to.

DBS checks and/ or collection of data in relation to criminal convictions will normally only apply to staff members, volunteers and/ or trustees of the organisation. If a DBS check is to be undertaken and data collected of this nature the individual will always be informed in advance.

4. How Do We Collect Personal Information From You?

We use different methods to collect data from and about you. We will only collect and process the following data about you:

- Information you give us through direct interaction and/ or by you completing one of our application forms or information collecting forms or someone completing the application form/ information collection form on your behalf and/ or by applying for any vacancy that we may from time to time advertise. This is information, such as Identity, Contact, Professional, that you give us by filling in forms on our site or by corresponding with us face-to-face, by post, phone, e-mail or otherwise. It includes personal information you provide when you:
 - meet us in person;
 - use our site;
 - instruct us to act on your behalf;
 - use our services;
 - perform a contract we have or are trying to enter into with you;
 - submit enquiries or information to us in order to apply for a grant or to enquire about applying for a grant;
 - enquiries about our services, ongoing matters or employment vacancies; and
 - when you report a problem to us.
- **Automated technologies or interactions.** Although we do not operate a website if we do start to then as you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We will collect this personal data by using cookies, and other similar technologies. Any such policy relating to this will be available on request.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data if we start to use a website.
 - Contact, Financial and Other data requested on our application form which may be collected by a social worker and or other third party.

- Identity and Contact Data from publicly available sources such as Electoral Register based inside the EU.
- We may also collect data from the following as well as having to share personal data with the following:
 - Social Services
 - Police
 - GP
 - Mental Health Teams
 - Solicitors
 - Housing Associations

5. How Do We Use the Personal Information?

We will only use your personal data where the law allows us to. We use information held about you when legally permitted for specific purposes and for legitimate interests. Most commonly, we will use your personal data in the following ways:

- to respond to your enquiry;
- to provide you with advice and services and to perform the contract we have entered into with you, or are about to enter into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- to improve our services;
- to contact you in the course of providing services to you or to enable us to process any grant application;
- to notify you about changes to our services or other third party services which may be available to you;
- to comply with our legal, regulatory or professional obligations;
- to provide you with any other information you request from us;
- to comply with internal compliance, security or other legitimate reasons;

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

6. Do we Disclose Your Personal Information?

We may have to share your personal data with the parties set out below for the lawful basis of processing for the legitimate interest, including:

- Any third parties as set out in this policy
- Third parties to whom we may choose to sell, transfer, or merge parts or all of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy;
- If the third party is a professional adviser to us, such as professional indemnity insurers, brokers, auditors, accountants, charities commission or other regulatory body and other professional advisers;

- If disclosure is required by law or any regulatory authority or if required to protect the rights, property, or safety of SAIL, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may share your personal data with other charities or organisations providing similar services to us only if you have given specific consent to do this on the application form you completed with us.
- We may share personal data with the following to enable us to provide you with services and ensure that we have all the information necessary to assist you, as well as having a duty to share certain information with the following in certain circumstances:
 - Social Services
 - Police
 - GP
 - Mental Health Teams
 - Solicitors
 - Housing Associations

All as reasonably required for the purposes set out in this privacy policy.

We will not share your personal data with any third parties for marketing purposes. We do not transfer your personal data outside the European Economic Area.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure and when you submit details via our site or email you are transmitting your information via the internet. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site or via email to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. How Long Do We Store Your Personal Information?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Information for adults is normally stored for 7 years from the last interaction with the adult or where a child is involved 7 years from the date they reach the age of 21 years of age. Any data will also be stored in accordance with any guidance issued by DCC or any funding requirements of the organisation.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Some of the time periods include:

- Any records required for the purposes of record keeping in accordance with tax and charities commission guidance;
- Documents and Deeds that we have agreed in writing to store for safe keeping on your behalf will be retained indefinitely; and
- Full copies of some files and applications may be retained indefinitely for legal, regulatory and professional indemnity reasons.

In some circumstances you can ask us to delete your data: see Request erasure this policy below (Your Rights) for further information.

9. Your Rights

You have all the rights in relation to your Personal Information that you are entitled to under applicable law. If you would like to:

- Access, correct, rectify, update, complete, supplement, block or restrict your Personal Information;
 - Delete the Personal Information we hold about you;
 - Object to our use of your Personal Information;
 - Withdraw your consent to us processing your Personal Information; or
 - Transfer your Personal Information from us to another firm, person or business please contact us at any time at SAIL at the address contained in this document. Any correspondence to be marked for the attention of the data protection officer and/ or trustees.
- **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Failure to Provide Your Personal Data

If you choose not to provide your Personal Information to us, it is likely we will not be able to consider any grant application we have received for you or in the case of employment be unable to perform the contract we have with you.

In certain circumstances (which we will inform you of) we are also required by law, (for example the requirements under the Money Laundering Regulations), to take personal data and information from you and without which we cannot act for you. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

11. Access to Information

You have the right to access the information held about you. If you would like a copy of some or all of the information that we hold about you, please contact us at any time at SAIL at the address contained in this document.

12. Changes to Our Privacy Policy

This version was last updated in September 2018.

Any changes we make to our privacy policy in the future will be posted on our web page that may be operating at the time and/ or available on request from SAIL at the address contained in this document.

13. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues

(www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

14. Contact

Questions, comments and requests regarding this privacy policy are welcomed, including any requests to exercise your legal rights, and should be addressed to SAIL at the address contained in this document.

15. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the same group or legally connected to SAIL, whether acting as joint controllers or processors and who are based in the United Kingdom.

External Third Parties

Service providers acting as processors based within the United Kingdom who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including accountants, bankers, auditors and insurers based within the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

16. YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.