

# Islington Centre for Refugees and Migrants' Privacy Policy

## 1. INTRODUCTION

1.1 The Islington Centre for Refugees and Migrants ("**we**", "**us**" and "**our**") is a charitable organisation registered in the United Kingdom at Cross Street Baptist Church, 16-18 Cross Street London, N1 2BG (Registration no. 1135205).

1.2 We are a "data controller" for the purposes of the General Data Protection Regulation 2016/679 ("**GDPR**"). We are committed to protecting your privacy and processing your personal data fairly and lawfully in compliance with the GDPR.

1.3 In the course of our business we may need to gather and use "**Personal Data**" about you, by which we mean any information about you from which you can be identified, such as your name, contact details and banking detail. The purpose of this privacy policy ("**Privacy Policy**") is to inform you of how we will process your Personal Data and the measures and processes we have put in place to ensure its adequate protection.

1.4 In using our website and receiving our services you consent to the collection, use, disclosure and transfer of your Personal Data as set out in this Privacy Policy.

## 2. FAIR AND LAWFUL PROCESSING

We will only process your Personal Data, where:

- (a) you have given your consent to such processing (which you may withdraw at any time, as detailed at clause 9 below);
- (b) the processing is necessary to provide our services through this website;
- (c) the processing is necessary for compliance with our legal obligations; and / or
- (d) for our legitimate interest or those of any third party recipients that receive your Personal Data (as detailed at clauses 5 and 6 below).

By "**processing**", we mean the collection, recording, storage, use, disclosure and any other form of operations or dealings with your Personal Data.

## 3. WHAT INFORMATION DO WE COLLECT FROM YOU?

3.1 We may collect any of the following personal information from you:

- (a) your name;
- (b) your contact details;
- (c) your emergency contact details;

(d) your date of birth;

(e) your bank or credit card details;

(f) reasons you have donated to us; and

(g) if you are receiving services from us, we may also collect sensitive personal information relating to your immigration or asylum status, physical and mental health and any criminal history if you have given your consent to such processing (which you may withdraw at any time, as detailed at clause 9 below).

3.2 In certain circumstances it will be necessary for you to provide us with your Personal Data, to enable us to manage our operations, to provide services to you or to comply with our statutory obligations. In other circumstances, it will be at your discretion whether you provide us with Personal Data or not. However, failure to supply any of the Personal Data we request may mean that we are unable to maintain or provide services or products to you.

3.3 We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your Personal Data or if you become aware that we have inaccurate Personal Data relating to you (see clause 9 below). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

#### **4. HOW DO WE COLLECT INFORMATION FROM YOU?**

4.1 We usually collect your Personal Data from the information you submit directly to us during the course of your relationship with us. For example, we typically collect information from you when you receive services from us, make a donation to us through a cheque or bank transfer, sign up for our email updates, sign up for our events or communicate with us via email.

4.2 We also collect your Personal Data from the information you submit to us indirectly. For example, we may collect information about you when you donate to us through third party websites like BT MyDonate, or when you sign up to hear from us through third party websites like Facebook. These independent third parties will only share your information with us if you give your consent for them to do so.

#### **5. HOW DO WE USE YOUR INFORMATION?**

We will process your Personal Data in connection with the management of our relationship with you for the following purposes:

(a) for fundraising, promotional and marketing materials and activities, including photos and videos;

(b) for administrative purposes in relation to the security and access of our systems, premises, platforms and secured websites and applications;

(c) to contact you about the services and fundraising opportunities we offer (where we have received your

consent to do so, or we believe that you may be interested in the material as it relates to similar services and fundraising opportunities you have previously expressed interest in acquiring from us);

(d) to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;

(e) to comply with court orders and exercise and/or defend our legal rights;

(f) for any other legitimate business purpose; and

(g) as otherwise permitted or required by any applicable law or regulation.

## **6. WHEN CAN WE DISCLOSE YOUR PERSONAL DATA?**

6.1 We do not and will not sell, rent out or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this notice and, in particular, to the following recipients:

(a) to third parties, such as MailChimp, for the purpose of sending you our communications;

(b) to third parties, such as Eventbrite, for the purpose of booking you tickets to events that you have requested to attend;

(c) to third parties who process your Personal Data on our behalf (such as our systems providers including our cloud provider, Google); and

(d) to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

## **7. INTERNATIONAL TRANSFERS OF PERSONAL DATA**

The Personal Data we collect from you may be transferred to (including accessed in or stored in) a country or territory outside the European Economic Area ("**EEA**"), including to countries whose laws may not offer the same level of protection of Personal Data as are enjoyed within the EEA. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the GDPR.

## **8. HOW WE PROTECT YOUR PERSONAL DATA**

8.1 We are committed to safeguarding and protecting Personal Data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any Personal Data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

The Islington Centre for Refugees and Migrants is registered with the Information Commissioner's Office (Registration Number: Z3346249).

## **9. YOUR RIGHTS IN RELATION TO THE PERSONAL DATA WE COLLECT**

9.1 If you wish to:

(a) update, modify, delete or obtain a copy of the Personal Data that we hold on you;

or

(b) restrict or stop us from using any of the Personal Data which we hold on you, including by withdrawing any consent you have previously given to the processing of such data,

you can request this by emailing us at the address set out in clause 12 below. We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

9.2 In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data.

9.3 We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your Personal Data, and for any additional copies of the Personal Data you request from us.

## **10. HOW LONG WE WILL HOLD YOUR PERSONAL DATA FOR**

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

## **11. HOW WE UPDATE OR CHANGE THIS PRIVACY POLICY**

11.1 We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Privacy Policy on <https://islingtoncentre.co.uk/>. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

11.2 This Privacy Policy was last updated on 12th March 2019.

## **12. HOW YOU CAN CONTACT US**

If you have any queries about the contents of this Privacy Policy, or wish to inform us of a change or correction to your Personal Data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Email: [islingtoncentre@gmail.com](mailto:islingtoncentre@gmail.com).

Post: Chief Executive, Cross Street Baptist Church, 16-18 Cross Street London, N1 2BG

### **13. HOW TO LODGE A COMPLAINT TO THE REGULATOR**

You are entitled to lodge a complaint with our data protection regulator if you consider that we have breached your data protection rights. Our data protection regulator is the Information Commissioner's Office, which can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.