



PRIVACY POLICY



Data Controller: (“the Company”): Double Impact Services

Data Protection Officer: Graham Miller grahammiller@doubleimpact.org.uk

Our Commitment to your Privacy

We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The Double Impact Privacy Policy may change so please remember to check back from time to time, this version, Version 1 was last updated on the 9th May 2018. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes where required.

Who we are?

Here at Double Impact we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

Double Impact is registered with the Information Commissioner's Office under number Z847509X, is a registered charity under number 1139865, and a registered company limited by guarantee under number 6004537 (England and Wales).

For further information about our privacy practices, please contact our Data Protection Officer Graham Miller by:

- Writing to Double Impact Services, 22-24 Friar Lane, Nottingham, NG1 6DQ
- Calling us on 0115 8240366
- Emailing grahammiller@doubleimpact.org.uk

How we collect information about you

Everything we do, we do to ensure that we can help people experiencing a substance misuse problem get both support, respect and opportunities. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving

emails, post or phone calls. We want to make sure you receive the best attention when you support us or make a donation.

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our services, register with us, make a donation to us, ask a question about substance misuse, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, or in person.

When you interact with us through partners: This could be if you access a service such as Nottingham Recovery Network where we work in partnership with both Framework Housing Association and the Nottinghamshire Healthcare NHS Foundation Trust or at Lincoln where we work in partnership with Addaction..

When you interact with us through third parties: This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

When you visit our website: We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

From other information that is available to the public: In order to tailor our communications with you to your background and interests we may collect information about you from publicly available sources or service providers (we have provided further details about this below – see 'Profiling: Making our work unique to you').

Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making a purchase or donation), as well as information you provide in any communications between us. You will have given us this information whilst making a donation or any of the other ways to interact with us.

We will mainly use this information:

- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services that you have requested.
- To update you with important administrative messages about your donation, an event or services you have requested.
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which

require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.

- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide services you have requested.

We may also use your personal information:

- To contact you about our work and how you can support Double Impact (see section 8 on 'Marketing' below for further information).
- To invite you to participate in surveys or research.

Sensitive Personal Information

If you share your personal experience or the experiences of a friend or relative, we may also collect this health information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your story with the media or other parties as part of our work telling people's personal stories about substance misuse (for example, on our website or in promotional literature).

A special note about the Sensitive Personal Information we hold

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you contact us at Double Impact Services you may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse
- Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your story, then we may publish it on our website or in other media.

Legal basis for using your information

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are

processing information is because there is a legitimate interest for Double Impact Services to process your information to help us to achieve our vision of ensuring that everyone experiencing a substance misuse problem gets both support, respect and opportunities.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

Marketing

We will only contact you about our work and how you can support Double Impact Services by phone, email or text message, if you have agreed for us to contact you in this manner.

However, if you have provided us with your postal address we may send you information about our work and how you can support Double Impact by mail unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting 'team@doubleimpact.org.uk' or clicking the unsubscribe link at the bottom of the relevant communication.

Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers) at Double Impact Services so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

Double Impact Services may however share your information with our trusted partners who we work with to deliver services. There are Partnership Agreements in place to make sure that any such data is stored securely, deleted when it is no longer needed and never used for any other purposes. Some examples of where we may share your information are with our partners who we work with to deliver services in Lincoln, Addaction and Framework Housing Association and the Nottingham NHS Trust in Nottingham City.

We do use third-party organisations to help us collect donations such as JustGiving and Stripe to help us fulfil our marketing. Where we use external companies to collect or process data on our behalf, we carry out comprehensive checks on these companies, and put in place contracts to control how they manage the data they may collect or have access to.

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority).

Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Any debit or credit card details which we receive on our website are passed securely to Stripe our payment processing partner, according to the Payment Card Industry Security Standards.

How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting Graham Miller at Double Impact Services, NG1 6DQ, by email at grahammiller@doubleimpact.org.uk and by phone on 0115 8240366. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.

- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Cookies

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide.

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.

- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

No cookies, please

You can opt out of all our cookies (except the strictly necessary ones). Find out how to control and delete cookies in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

If you have any questions about how we use cookies, please contact us.

Confidentiality and data protection for our Helpline and Webchat Service

The Recovery Links Nottinghamshire Helpline and Webchat Service (RLN helpline) respects and seeks to preserve the confidentiality of callers. Confidentiality is based on the common law 'duty of confidence' and is shared between the caller and the helpline service, not the individual worker.

The RLN helpline does not as a matter of course ask for names or contact details, record conversations or process or store personal or identifying information about users.

Occasionally calls may be recorded for training or monitoring purposes including the development of the service. In these instances, personal information or any details that may identify the user are not collected or saved.

In exceptional circumstances, confidentiality may be broken and personal or identifying detail will need to be processed or saved. The helpline will always endeavour to get the permission of the user when it is judged that a third party has to be involved. Situations when confidentiality will be broken without the consent of the caller are:

- When a caller has informed the helpline that they have serious intent or injury and have acted to take their own (or someone else's) life at this time.
- When a caller has informed the helpline that they have information or knowledge about current or future terrorist activities.
- When a caller has revealed that they are abusing a child or vulnerable adult.

Should it be considered essential to a caller's wellbeing, and the caller requests it, and provides information detailing name, location, contact details and current situation, this will be passed on the emergency services, in appropriate circumstances, where a caller is unable or unwilling to do this for themselves.

More information regarding this can be found in the RLN Helpline & webchat service's Confidentiality policy.

In the above situations, where we need to process personal or identifying information, this information will only be used for the immediate action needed. No further processing of the data will occur, and we will never use the information to contact a user in the future. The data will be stored securely by the RLN Helpline to form part of an incident log. This information will be kept for seven years and then securely deleted.

When using the webchat, IP addresses will be recorded automatically via the Double Impact Services website. This data is always stored securely. IP addresses are not used to track or identify users except in those instances outlined in the RLN Helpline & webchat service's Confidentiality policy.