

# **NORTH OF ENGLAND REFUGEE SERVICE**

## **NERS**

### **NERS Data Protection Policy**

Reviewed on: January 2021  
Next review: January 2023

## Policy

The North of England Refugee Service (NERS) is registered with the Information Commissioner's Office (Registration Reference Z6720048) in accordance with the UK Data Protection Act 2018/GDPR. NERS cares about your personal data and is committed to protecting your privacy. This privacy policy explains how we will collect, store, and process your personal information. References to 'we' or 'us' are to NERS, registered charity number 1091200.

### Whose personal data do we work with?

We regularly process the personal data of people who fall into the following categories:

- Individuals receiving/using our advice, interpreting or housing services
- Individuals working at or connected with partner organisations or services
- Our supporters, including those who make donations to our work
- Our suppliers, including those delivering work for NERS on a freelance basis
- Our employees
- Our volunteers
- Individuals visiting our website

### What personal data do we collect?

We collect and work with personal data. Personal data is information that can be used to identify a living individual, such as names, addresses, phone numbers, e-mail addresses, postcodes, customer and client records, details of enquiries, IP addresses, location data, online identifiers, pictures or other biometric data, service records, attendance lists, minutes of meetings, mailing lists, bank account details and other financial records. When we process your data for the purposes of providing advice or support service, this data may sometimes include 'special categories data' for example, race, religious or political beliefs, sexual orientation or health data.

We collect personal data when you interact with us, for example:

- When you contact us to access our services over the phone, by email, or by visiting one of our officers

- When you make a donation to us
- When you volunteer or seek employment with us
- When you visit our website
- When you attend an event
- When we have contact with you that relates to our wider interests in advice provision and the interests of our beneficiaries, or your interests in our work
- When you undertake work on our behalf or supply us with products or services

The information we gather and how we use it relates to the nature of your relationship with NERS and the reasons for which your personal data is being processed. We seek to give an overview of this here, but please contact us if you need further information.

### **How will we use the information about you?**

We need to collect and use personal data to provide services and products, to fulfil our charitable objectives, to run the organisation efficiently and effectively, to meet our legal obligations, to contract with individuals and organisations, and to fundraise and generate income for our work. We only collect personal data that we need. If we need your consent to collect or use your personal data, we will ensure that we have this consent from you. We will do our best to keep personal information secure by taking appropriate technical and organisational measures.

We will never give personal data to third parties, with the following exceptions:

- Where you have given us your consent to share your personal data, for example to get help or support from another organisation.
- To further the legitimate interests of NERS and our beneficiaries and supporters, for example: improving a service that we provide; developing a new service or letting our members know about a service.
- Where we use third party organisations to process your personal data on our behalf as set out in this privacy statement, for example organisations that provide us with cloud-based ICT services or services that help facilitate online sessions and meetings (e.g. ZOOM – <https://www.zoom.us/privacy>). Such processing is governed by written agreements or applicable privacy policies.

- Where we need to process your data to carry out a public task:
- Where we have legal obligations, for example, our legal obligations to prevent terrorism and money laundering, or to provide personal data to HMRC.
- In a life or death situation where we need to protect your vital interests or the vital interests of a third party, for example if you needed urgent medical assistance and were unable to give your consent to us seeking such assistance on your behalf.
- Where we have reasonable grounds for believing that not sharing personal information will result in serious harm to you or a third party, in line with our legitimate charitable purposes.
- Where we judge that sharing personal information is justified for the prevention of crime, in line with our legitimate charitable purposes.

We keep your personal information only for as long as it is necessary, and for compliance purposes for 6 years. In some circumstances, we may be legally required to retain your personal information for longer e.g., Insurance / legal issue or audit purposes. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

We use your information collected from the website to personalise your repeat visits to our website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website and 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.

Personal information you submit to NERS is stored on secure servers and where hard copies exist, in locked storage.

In order to successfully process your data, we may sometimes need to transfer personal information you submit to us to countries or jurisdictions outside the UK. In such instances, we will ensure that we will only transfer personal information to secure organisations with good data protection practices.

## **Marketing**

We would like to send you information about events or work of ours which may be of interest to you, or which you may wish to support. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be

contacted for marketing purposes, please email xxxx mailbox stating 'OPT OUT' in the subject field.

## What are my rights?

Under data protection legislation applying from May 25<sup>th</sup> 2018, you have the rights listed below. Get in touch as described in the 'How to Contact Us' section if you wish to exercise any of your rights. We will respond within one month, though in some circumstances we may need to extend the time for a full response, and this will be communicated to you. You will not usually need to pay us for making the request, but you may need to provide identification.

For further, independent information and detail about your rights, see <https://ico.org.uk/for-the-public/>

- The right to be informed – we inform you through this privacy statement and through other privacy-related communications, whether you interact with us in person, by telephone, by e-mail, online or using other channels.
- The right of access – you have the right to ask us for confirmation that your data is being processed and to access this data (a 'subject access request').
- The right to rectification – you have the right to have inaccurate or incomplete personal data corrected or completed.
- The right to erasure – you have the right in some circumstances to ask us to erase your personal data (the 'right to be forgotten'). Sometimes, this right may not apply, for example when the personal data needs to be retained for insurance purposes, or in relation to legal claims.
- The right to restrict processing – you have the right to ask us to limit how we collect and use your personal data, for example, to stop us deleting data that you might need in relation to a legal claim.
- The right to data portability – you have the right in some circumstances to be given your personal data in a structured, commonly used and machine readable form. This only applies to personal data you have given directly to us, where processing is carried out by automated means, and where the personal data is being processed based on your consent or in relation to a contract.
- The right to object – you have the right in some circumstances to object to processing of your personal data. This includes your right to object to: processing that we justify as being based on our legitimate interests;

direct marketing; and processing of personal data for research and statistical purposes.

## **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. You can set your browser not to accept cookies and the following websites ([All About Cookies](#) or [Your Online Choices](#)) tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

## **Changes to our privacy policy**

We keep our privacy policy under regular review next review date January 2023, and we will place any updates on this web page. This privacy policy was last updated on January 2021.

## **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you:

By Email – [info@refugee.org.uk](mailto:info@refugee.org.uk)

Or write to us at: 2 Friars Street, Newcastle upon Tyne, NE1 4XA

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 – Wycliffe Lane, Water Lane, Wilmslow, SK9 5AF / 0303 123 1113 / <https://ico.org.uk/global/contact-us/email/>