



# FareShare Sussex Privacy Policy

2020

Date approved by Board of Trustees:	November 2020
Date of publication:	2020
Author:	
Review Date:	March 2023
Version:	1.0

# FareShare Sussex and Surrey Privacy Policy -September 2020

Our commitment to protecting your privacy is paramount at FareShare Sussex and Surrey. This policy sets out when and why we collect personal information, how we use it and how we keep it secure. If you have any queries about this, please contact us at Unit 3-4 , Fairway Business Centre, Westergate Road, Brighton BN2 4JZ, email [info@faresharesussex.org.uk](mailto:info@faresharesussex.org.uk) or call 01273 671 111

---

## How we collect your data

### Data we collect directly from you

You provide this data in a variety of ways including when you:

- Register with us to become a volunteer
- Apply for a job
- Sign up to receive our newsletter
- Support us through a donation
- Take part in one of our events
- Submit a query, give us feedback or make a complaint
- Express interest in working with us to receive or provide surplus food
- Enter into a contract or agreement with us
- Have your photograph taken or supply a case study

### Data we collect indirectly from you

We collect data indirectly from you where you interact with one of our third party partners (e.g. Just Giving if you are donating). We also collect data indirectly from you when you visit our website through the use of Cookies (see section Use of Cookies below).

### Data we collect about you from other sources

We gather contact details about you from publicly available sources on the internet, such as charity websites, corporate websites and social media, in order to increase our network of organisations that can support us, or that we can support.

### Types of data we collect about you

#### Personal Data we collect about you:

- First name and last name
- Postal address
- Email address
- Mobile and home phone number
- Date of birth
- Where you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability, which may include your education and career, and any unspent criminal convictions
- Bank account details
- Information as to whether you are a UK taxpayer to claim Gift Aid
- Accident records if you have an accident on our premises
- Data from your visit to our website, such as what pages you visited and how long you visited it for, your IP address and browser type you use, through the use of cookies

### **Use of Cookies**

‘Cookies’ are small files that are automatically placed on your computer, storing an anonymous unique identifier for each website visitor.

These include cookies from third parties such as Google and Facebook.

The cookies are anonymous, and we do not use cookies to identify you personally.

You can disable cookies in your web browser settings, or disallow cookies for specific websites.

If you have login access to our website (i.e. as a member of staff), then our website will also place a security cookie on your computer.

### **Special category data**

Special category data is considered more sensitive than other data. It covers things such as your race, health, ethnicity, religion, political beliefs, genetics, biometrics, trade union membership, and sexual orientation. We only collect this type of information if there is a clear reason to do so, for example asking for health information where you are a volunteer or member of staff, so that we can make any reasonable adjustments. For further details, refer to our Volunteer Privacy Notice and our Staff Privacy Notice.

### **How do we use your personal data**

FareShare Sussex and Surrey uses the collected data for the following purposes:

- Relationship management: to keep a record of our interactions with you to better manage our relationship
- Market research on our services: contacting you by email, telephone, or post to gauge your interest in our services of donating or distributing surplus food
- Carrying out our services: use your contact details to carry out our obligations under any business arrangement entered into between the organisation you work for and us (e.g. processing your data to allow for the pick-up and delivery of surplus food by our third party hauliers)
  - Where you work for a Member that receives food from FareShare Sussex and Surrey, this includes sharing your contact details in FareShare Sussex and Surrey's centralised Gladys food logistics system
  - Where you work for a Member that receives food from us, this also includes providing you with customer support or keeping you updated with the service you have subscribed to
- Marketing communications: to provide information about our activities, campaigns, fundraising appeals, volunteering or events. This will usually be where you have provided your consent, unless we are able to rely on our Legitimate Interest for contacting you (see below on Lawful Basis for Processing).
  - This includes sending you marketing materials where you work for a Community Food Member
  - Donations: to process donations we may receive from you, including whether you are a UK taxpayer so we can claim Gift Aid
- Fundraising: to fundraise in a manner that you would reasonably expect
- Record keeping: including enquiries, feedback or complaints
- Accidents: to record details of any accidents you might have on our premises as part of our health and safety obligations
- To process payments: where you work for one of our suppliers, to liaise with you in order to facilitate payment for services you have invoiced us for
- Recruitment: processing your job or volunteer application in order to evaluate your suitability and to respond to you
- Events and awards: organising events such as our Volunteer Awards, and making the necessary transport and event arrangements (including catering)
- Photos and case studies: where you have consented, using your image or other types of Personal Data in our marketing materials and campaigns, and similar publications such as annual reports and reports to funders
- Surveys: to invite you to participate in surveys on a voluntary basis
- Service improvement: to gather analysis or valuable information so that we can improve our service
- Usage monitoring: to monitor the usage of our service

- Troubleshooting: to detect, prevent and address technical issues

## **Legal basis for processing personal data under GDPR**

FareShare Sussex and Surrey's legal basis for collecting and using the personal information described in this privacy notice depends on the Personal Data we collect and the specific context in which we collect it.

FareShare Sussex and Surrey may process your Personal Data because:

- We need to perform a contract with you
- You have given us consent to do so (e.g. for the use of your image in photos, for sending you our newsletters)
- The processing is in our legitimate interests and it's not overridden by your rights. This includes:
  - Recruiting for staff and volunteers
  - If you are a volunteer, to provide you with service updates and other volunteer initiatives in relation to your role or which we think you might be interested in
  - To process your contact details where the charity you work for is interested in becoming a Member
  - Where you work for a Member, to send you operational communications (e.g. product recalls, exit interviews) and marketing communications in relation to our services (including joining them) and in promotion of our aims and ideals
  - Where you are one of our food partners, to send you operational or marketing communications in relation to your service and to promote our aims and ideals
  - To undertake market and internet research to find new potential Members that we think might be interested in our services, or new potential food partners that might be interested in supplying us with surplus food, or new potential donors and funders
  - To arrange and organise events
- We have a legal obligation (e.g. for health and safety reasons if you are a member of staff or a volunteer, or to process payment for invoices where you work for one of our suppliers)

## **Retention of data**

FareShare Sussex and Surrey will retain your Personal Data only for as long as is necessary for the purposes set out in this privacy notice. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We have a retention

policy that sets out the different retention periods based on the data type and how it is used, and we have processes in place to ensure these are reviewed and adhered to.

FareShare Sussex and Surrey will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, approximately 50 months, except, when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods

Personal data that no longer serves a purpose is securely disposed of, or made anonymous so that you are no longer identifiable from it.

### **Transfer of data outside the UK**

Your Personal Data is normally kept within the UK, however on certain occasions, may be transferred to and maintained on computers located outside of the UK and the EEA where the data protection laws may differ. FareShare Sussex and Surrey will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

We offer the use of a secure server. All information supplied on our internet based service is transmitted via Secure Socket Layer (SSL) technology.

### **Disclosure of data**

We do not sell or trade your personal data to outside third parties. Your personal data however may be shared in the following circumstances:

- To third parties and suppliers to provide the services you have requested, for example:
- To our funders and food partners, where you have provided consent for your photo or case study to be used in marketing materials
- To third parties that process your data per our specific instructions, otherwise known as Data Processors, such as Donorfy to process your donation, Salesforce to manage your volunteering activities, and third party event organisers who organise events on our behalf
- To employment references, by consent for job applications
- To third parties where legally required to, for example to HMRC for any tax investigations, or to law enforcement agencies for the detection and prevention of crime

## Security of data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use our best efforts and commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Your rights

You have the following rights in relation to the Personal Data FareShare Sussex and Surrey holds:

- The right to be informed: you have the right to be informed about how we collect and use your Personal Data. In particular we will be fully transparent about this in any policies and communications we provide you that involves your Personal Data
- The right to access: you have the right to request a copy of any of the Personal Data that we hold on you
- The right to rectification: we will ensure that all Personal Data we hold on you is accurate and up to date, and you have a right to have any inaccuracies rectified
- The right to erasure: also known as the “right to be forgotten” allows you to request that Personal Data we hold on you is erased
- The right to restrict processing: you have the right to request the restriction or suppression of your Personal Data if there is disagreement about its accuracy
- The right to object: you have the right to object to the processing of your Personal Data, where this is based on legitimate interest, or if it’s being used for direct marketing, or if we are using it for research purposes
- The right to data portability: this allows you to obtain and reuse your Personal Data for your own purpose across different services, for example to request that we transmit your data directly to another controller in a structured, commonly used and machine-readable format
- Rights related to automated decision-making: automated individual decision making is a decision made by automated means, without any human involvement, and you have a right to not be subject to this type of decision making. Please note FareShare Sussex and Surrey does not currently undertake any activities that require automated decision making and profiling at this time

Please be aware that we may ask you to verify your identity before responding to such requests. We will respond fully to your request within one month of receipt, unless we require further clarification, in which case we will notify you of this without undue delay.

Please note that you are always able to easily opt-out of any of our marketing communications at any time by clicking on “unsubscribe” at the end of the communications you receive from us.

For further information about your rights, please consult the guidance published by the UK’s Information Commissioner’s Office.

### **How to exercise your rights**

You can make a request to exercise any of your rights by emailing:  
info@faresharesussexandsurrey.org.uk

Dan Slatter is FareShare Sussex and Surrey’s Data Protection Officer.

If you feel we have not dealt with your request satisfactorily, you can also contact or lodge a complaint with the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113.

---

### **Social Media**

The data we are given access to by social media services will vary but will always be in line with the Terms of that particular service. We will not be able to access your private messages or photos and it will include only what you specifically send to us.

FareShare Sussex and Surrey’s website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

### **Behavioural remarketing**

FareShare Sussex and Surrey may use remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

### **Twitter**

Twitter remarketing service is provided by Twitter Inc.

You can opt-out from Twitter’s interest-based ads by following their instructions:  
<https://support.twitter.com/articles/20170405>

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

## **Facebook**

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

## **Google AdWords**

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

## **Analytics**

We may use third-party Service Providers to monitor and analyse the use of our Service.

## **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on at this link <https://tools.google.com/dlpage/gaoptout>. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

---

## **External links**

Our Service may contain links to other sites that are not operated by us.

Although FareShare Sussex and Surrey only looks to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website or on FareShare Sussex and Surrey's social media channels.

FareShare Sussex and Surrey cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and FareShare Sussex and Surrey cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## **Changes to this privacy notice**

We may update our privacy notice from time to time. We will notify you of any changes by posting the new privacy notice, with the "effective date" at the top, on this page.

You are advised to review this privacy notice periodically for any changes.

FareShare Sussex and Surrey reserves the right to amend this privacy notice. The most up to date version will always be available on our website.

## **Definitions**

### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession). Non-personal data means data that is in no way personally identifiable.

### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small pieces of data stored on your device (computer or mobile device).

### **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this privacy notice, we are a Data Controller of your Personal Data.

### **Data Processors**

Data Processor means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Data Processors in order to process your data more effectively.

### **Data Subject**

Data Subject is any living individual who provides us with Personal Data.

### **Member**

A Member is an organisation who has registered with us to use our services in order to receive surplus food, such as Community Food Members

### **GDPR**

GDPR stands for General Data Protection Regulation, and is the EU law regulating the data protection and privacy of individuals in the European Union and European Economic Area