

### **The Stable Family Home Trust Privacy Statement**

#### Introduction

We want everyone who supports us, uses our services or is employed by us, 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 Stable Family home Trust Privacy Policy may change so please remember to check back from time to time, this version was last updated on the 1 March 2025. Where we have made any changes to this Privacy Policy, we will make this clear on our website.

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#### 1. Who we are

We are The Stable Family Home Trust, Charity No:1093672, Registered Company No: 4421606. 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 UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Privacy Officer by:

- Writing to The Stable Family Home Trust, The Stables, Bisterne, Ringwood, Hampshire BH24 3BN
- Calling us on 01425 478043
- Emailing to <a href="mailto:reception@sfht.org.uk">reception@sfht.org.uk</a>

# 2. How we collect information about you

We want to make sure you receive communications that are relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you have a good experience when you contact us for information on our services or events 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 or request information on an event, make a donation to us, purchase something from our shop, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, make a purchase, or get in touch through the post, email or in person.

When you interact with us through partners or suppliers working on our behalf: e.g. Local Authorities, people who administrator our admin functions.

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'.

Wherever possible we use anonymous information which does not identify individual visitors to our website.

#### 3. Information we collect and why we use it

#### a. Supporters

**Personal information** we collect includes details such as your name, 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 requesting information on our services, making a donation, registering for an event, making a purchase from our shop 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 or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods 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.

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 goods and services you have requested.

We may also use your personal information:

• To contact you about our work and how you can support The Stable Family Home Trust (see section 6 on 'Marketing' below for further information).

### b. Volunteers

**Personal information** we collect includes details such as your name, date of birth, email address, postal address, telephone number, as well as information you provide in any communications between us. You will have given us this information whilst, applying for a voluntary opportunity with us.

We will mainly use this information:

- To process your application.
- To administer the volunteering arrangement.
- To keep a record of your relationship with us.

If you do not provide this information, we will not be able to process your application to volunteer with The Stable Family Home Trust

We may also use your personal information:

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

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.

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, sexual orientation or religious beliefs.

If you provide us with details of a sensitive nature as part of your application to volunteer with us.

We will only use this information:

- For the purposes of dealing with your application to volunteer with us.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include a medical emergency.

#### c. Employees

### **Application Process:**

**Personal information** we collect includes details such as your name, email address, postal address, telephone number, as well as information you provide in any communications between us. You will have given us this information whilst applying for a job and completing an application form.

We will use this information:

- To process your job application.
- · To keep a record of your relationship with us.

If you do not provide this information, we will not be able to, process your job application with The Stable Family Home Trust.

We may also use your personal information:

• To contact you about our work and how you can support The Stable Family Home Trust (see section 6 on 'Marketing' below for further information).

#### **Employment**

**Personal information** we collect includes details such as your name, date of birth, email address, postal address, telephone number, National Insurance number, bank account details, referee contact details, next of kin details as well as information you provide in any communications between us. You will have given us this information having accepted an offer of employment from The Stable Family Home Trust.

We will use this information:

- To fulfil your employment contract, including; payroll, learning and development and employee benefits.
- To keep a record of your relationship with us.

If you do not provide this information, we will not be able to offer you employment with The Stable Family Home Trust.

We may also use your personal information:

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

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.

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, sexual orientation or religious beliefs.

If you are employed by us, you may choose to provide details of a sensitive nature.

We will only use this information:

- To enable you to do your job.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances such as a medical emergency.

### d. Service Users

**Personal information** we collect includes details such as your name, your date of birth, your parents' or next of kins' name, email address, postal address, telephone number, as well as information you provide in any communications between us. You will have given us this information whilst registering an interest in or participating in our Supported Living, Residential or Aspire Day services.

We will use this information:

- To provide Residential, Supported Living or Day services.
- To keep a record of and support your relationship with us.

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.

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, sexual orientation or religious beliefs.

If you contact us to register an interest or are already in our Support Living, Residential or Day services, you may choose to provide details of a sensitive nature.

We will only use this information:

• For the purposes of ensuring you are safe and healthy and in the best place in the services we provide, including sharing your information with Local Authorities, care management and safeguarding.

### 4. Legal basis for using your information

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation (for example, and employment <u>contract</u>)
- We have your <u>consent</u> to use your personal data (for example, to contact you with information you have requested or if you have applied for a job with us)
- To protect your <u>vital interests</u> or those of another person (e.g. in case of a medical emergency);
- It is in our <u>legitimate interests</u>. This means that the reason that we are processing information is because there is a legitimate interest for The Stable Family Home

Trust to process your information (for example to contact you about our work, for our legal purposes or for complying with guidance from the Charity Commission).

Whenever we process your Personal Information 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.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

# 5. Marketing

We will only contact you about our work and how you can support The Stable Family Home Trust 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 The Stable Family Home Trust 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 reception@sfht.org.uk

#### 6. Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers) at The Stable Family Home Trust so that they can support you or keep you informed about our work.

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.

The Stable Family Home Trust may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. Some examples of where we may share your information are with our partners who help us to:

- process donations and claim Gift Aid
- process debit or credit cards when you make purchases in our shop
- process our internal administration functions.
- maintain our properties
- administer our IT system

administer funding for service users i.e.Local Authorities

We enter into contracts with service providers that 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); or, in order to enforce our conditions of employment or access to our Residential, Supported Living or Day services.

# 7. 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.

#### 8. How long we hold your information for

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations. (for example; we must keep your data for 6 years after you have stopped being a client or employee)

When we no longer need your personal data, we will securely delete or destroy it.

### 9. 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 The Stable Family Home Trust, The Stables, Bisterne, Ringwood, Hampshire BH24 3BN or by email at <a href="mailto:reception@sfht.org.uk.">reception@sfht.org.uk.</a> and by phone on 01425 478043. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <a href="mailto:Information Commissioner's Office">Information Commissioner's Office</a>

• 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 either in writing to The Stable Family Home Trust, The Stables, Bisterne, Ringwood, Hampshire BH24 3BN or by email at reception@sfht.org.uk 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.
- <u>Erasure</u>: 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.

# 10. 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.

More information on Cookies and how we use them