



MAP Privacy Information Notice

for funders, donors, supporters and professionals connected with MAP; for visitors to our website, and people who contact us via social media.

What is the purpose of this document?

MAP is committed to protecting the privacy and security of your personal information.

This privacy notice describes why and how we collect and use personal information about you during and after your connection with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all funders, donors, supporters and professionals connected with MAP; to all visitors to our website and people who contact us via social media.

- **Funders** are organisations and people working for those organisations who fund MAP, for example by means of a grant, contract or donation.
- **Donors** are individuals who make a single or regular donation to MAP.
- **Supporters** are individuals and organisations, and the people who work for those organisations, who wish to be informed of MAP's work, for example by means of our newsletter; who advocate for MAP, for example by means of a verbal or written reference.
- **Professionals** are individuals and organisations, and the people who work for those organisations, who work with MAP in a professional capacity, for example by making and receiving referrals; who attend MAP training or commission training from MAP.
- **Visitors to our website** www.map.uk.net.
- **People who contact us via social media** facebook, twitter, Instagram.

MAP is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you, and to notify you of that information by means of this privacy notice.

This notice applies to current and former funders, donors, supporters and professionals connected with MAP. We may update this notice at any time, and will inform you if we do.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The purpose for collecting, holding and using personal information

We want to build a good relationship with each of our funders, donors, supporters and professionals connected with MAP so that together we provide excellent support services for young people in Norfolk. We want our funders, donors, supporters and professionals connected with MAP to have an excellent experience with MAP, to feel valued, involved, and that they are informed about the positive impact they are making. Good relationships with our funders, donors, supporters and professionals connected with MAP will generate income to enable us to deliver services.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Business contact details such as name, title, job title, addresses, telephone numbers, and business email addresses.
- Date of birth.
- Gender.
- Photo.
- Marital status and dependants.
- Reason for donating to or supporting MAP.

How is your personal information collected?

We typically collect personal information at the point that a donor makes a donation on an online platform, by letter or in person; when a fundraiser contacts us by phone, email, letter or in person; by desk-top research of information of funders in the public domain; when a supporter signs up to receive our e-newsletter; when a professional contacts us to access our services.

We will collect additional personal information in the course of our connection with you.

How we will use information about you

We will only use your personal information as the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).

2. Where it is needed in the public interest (or for official purposes).

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below.

How we use your personal information	Legal grounds for using your personal information
To analyse different sources of income to inform our Fundraising Strategy and how we make funding requests.	Legitimate interests in line with MAP’s charitable objectives.
To thank funders, donors and supporters	Legitimate interests in line with MAP’s charitable objectives.
To invite funders, donors, supporters and professionals connected with MAP to events.	Legitimate interests in line with MAP’s charitable objectives; Consent.
To inform funders, donors, supporters and professionals connected with MAP of the need for and the impact of our services	Legitimate interests in line with MAP’s charitable objectives; Contractual obligations; Consent.
To help donors to promote their fundraising activities by e.g. sending press releases to the media.	Consent.
To request references for funding applications and personal recommendations	Consent.
To claim gift aid on donations.	Legal obligation.
To record donations and funding for auditing controls.	Legal obligation.
To provide a service e.g. training.	Legitimate interests in line with MAP’s charitable objectives; Contractual obligations; Consent.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.

Data sharing and Third Parties

We only share your personal information with third parties for legitimate interests and to comply with the law, for example to reclaim gift aid, and for auditing purposes.

When someone visits www.map.uk.net we use a third party service, **Google Analytics**, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will make this clear and will explain what we intend to do with it.

Our website uses **Cookies** – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

We use a third party provider, **Mailchimp**, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see Mailchimp's privacy notice here www.mailchimp.com/legal/privacy/.

We use a third party provider, **Hootsuite**, to manage our social media interactions. If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. It will not be shared with any other organisations.

We use a third party provider, **Harlequin**, to manage our contact database. Our Development Team, Finance Team and Senior Management Team use this password protected database to process donations and payments relating to contracts, to store personal information so that we can analyse income received, donors' giving behaviour, keep in touch with people in the way that they prefer. For more information, please see Harlequin's privacy notice www.harlequinsoftware.co.uk/privacy/.

We use a third party provider, **Premier Links**, to manage the use and security of our IT systems. For more information, please see Premier Links' privacy notice <http://www.premierlinks.co.uk/Privacy%20Policy%202018%20GDPR.pdf>.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with applicable laws and regulations once 3 years lapse following a funding or donation transaction.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to 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.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Development Manager at MAP in writing.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Development Manager at MAP. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data breaches

If MAP discovers that there has been a breach of Development-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. MAP will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

International data transfers

MAP will not transfer Development-related personal data to countries outside the European Economic Area (EEA).

Individual responsibilities

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside of MAP) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from MAP's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under MAP's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing Development-related personal data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

Changes to this privacy notice

We may update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This privacy notice was last updated on 24th May 2018.

You have the right to complain to the ICO (Information Commissioner's Office) www.ico.org.uk if you think there is a problem with the way that MAP is using your personal information.

If you have any questions about this privacy notice, please contact MAP at info@map.uk.net.