

## Introduction

BHN is a UK registered charity (number 1138498). You can read more about our mission and work at [www.bhn.org.uk](http://www.bhn.org.uk)

We respect your privacy and will do all we can to make sure that we protect your privacy and make sure that the personal data you provide us with is kept safe.

This policy explains how we collect data, how we use and store information and what this means for you.

We welcome any feedback about our work – please email [contact@bhn.org.uk](mailto:contact@bhn.org.uk) Our registered office is Easton Family Centre, Beaufort St, Easton, Bristol, BS5 0SQ.

## What information do we collect?

### Given directly to us

We collect personal information when you engage with us, for example when you sign up to our newsletter, make a donation, get involved as a volunteer, attend an event or otherwise provide your personal details.

### From website interaction

We collect non-personal data such as IP addresses, details of pages visited and files downloaded.

### Indirectly from third parties

We collect information from third parties such as fundraising sites like BT MyDonate and Just Giving, where you have agreed to support BHN and have given your consent. You may wish to check their privacy policy to find out more information about how they will process your data.

### Via referrals from partner organisations

Some other organisations offering support to refugees and asylum seekers may provide some information to BHN if you have given your consent. This will normally be when BHN is being asked to work with someone to offer them support.

### When you give your permission to other organisations

We may collect information that you make available on social media sites such as Facebook or Twitter. You may wish to check their privacy policy to find out more information on how they will process your data.

### Sensitive Data

In the specific situation where BHN provide housing or advocacy support to people seeking asylum, we may ask to collect sensitive personal data. If people give their consent then this may include their racial or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual orientation or preferences

## What do we do with it?

### Processing of donations / requests

We may use the personal data we collect to:

- Keep you up to date on news about our mission and work;
- Ask for financial and non-financial support, such as volunteering
- Process donations you give us, or to support your fundraising for us, including gift aid;
- Provide information
- Provide a personalised service, such as personalised emails;
- Keep records of your relationship with us e.g. questions you have asked or complaints you have made;
- Classify supporters by where you live
- Analyse the personal information we collect about you

We may use publicly available information, or information you have given permission to other organisations to share such as Facebook.

### Basis of processing your data

**Consent :** If you are a new supporter contacting us for the first time, on or after 1<sup>st</sup> May 2018, we will process your personal data on the basis of the consent you provided us with. You are free to change your preferences at any time by contacting us by telephone, post or email as shown in the section 'Your choices and telling us when things change' below.

**Legitimate interest :** Contacting you; If you are an existing supporter as at 1st May we may continue to contact you by email where you have previously given us your consent. We may also contact you by post or telephone where we have a legitimate interest to do so. For example, where you have previously made a donation to BHN we may continue to send you information about the work your donation is making possible or other work we may wish to do. Where you have previously asked us not to contact you in this way we will continue to respect your contact preferences. You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email as shown in the section 'Your choices and telling us when things change' below

**Legitimate interest :** Contacting the right supporters at the right time; When you make a donation, express an interest in our work, or show a potential to support our work, we will rely on our legitimate interest in order to collect additional information as noted above in 'Processing of requests / donations / calls to action'. This helps us to identify those supporters who would benefit from a discussion with our supporters team and to ensure we use our supporters money in the most effective ways.

### Applying for a job or volunteering with us

Where you provide personal data and sensitive personal data when applying for a job with us, such as the information on your CV we will process, store and disclose the personal data we collect to:

- Support the recruitment process;
- Enable you to submit your CV and apply for jobs;
- Answer any questions you may have;
- Use third parties to provide services such as references or criminal referencing;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

Where you provide personal or sensitive personal data, such as dietary, mobility requirements or health information, to volunteer with us we will store, process and disclose the personal information we collect to:

- Deliver the volunteering opportunity, including the disclosure of sensitive data, such as medical information, to ensure a safe trip or experience for all involved;
- Provide information including fundraising materials as we promised in the 'What we will do?' section or equivalent of the volunteer role description;
- Provide the administration of these events or opportunities;
- Monitor the quality of the volunteering opportunity provided;
- Answer any questions or feedback you may have;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

## How and where we store your information

### How long?

We will keep your personal information only for as long as we consider it necessary to carry out each activity.

We have a data retention policy to implement this. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

For example we will retain details of donations for 7 years to meet tax and accounting requirements, but we will only hold sensitive personal information provided to engage in a volunteer opportunity until the volunteering is completed.

If you have any questions about our Data Retention Policy please contact us in writing at

Data Protection Officer, Bristol Hospitality Network, Easton Family Centre, Beaufort St, Easton, Bristol, BS5 0SQ Or email to: [contact@bhn.org.uk](mailto:contact@bhn.org.uk)

### Security

We attempt to ensure that we have in place appropriate technical controls in place to protect any personal data you provide. For example, we attempt to ensure that data is encrypted and our network is protected.

We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

### Financial Details Security

If you use third party providers such as BTMyDonate, JustGiving or Paypal to make a donation to BHN then you may wish to check their privacy policy to find out more information about how they will process your data.

We receive some bank account details for the purpose of processing donations from standing orders and direct debits.

## Where we store your personal information

We use cloud based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We take all reasonable steps to ensure that your data is stored and processed securely in accordance with European data protection regulations. By submitting your personal data you agree to this transfer, storing and processing of your information.

## When we share your information

We do not share or swap your information with any other charities.

### Legal Duty

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

### Our service providers and third parties

Occasionally we may employ agents to carry out tasks on our behalf, such as processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

## Cookies

### What are cookies

We collect data using cookies. A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website, for example, traffic data, location data, device information, the date and time of your visit and the pages that you visit.

The use of cookies is an industry standard for most major websites. You can find more information about cookies by following [this link](#).

### BHN's use of cookies on our website

To get the most from our website, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the site.

The cookie data that we collect we may use to:

- customise the content on our website and to help to understand visitor's current and future needs
- process any requests, applications or transactions you may make
- aid internal administration and analysis

### Managing cookies

Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.

## Third party cookies

Tearfund works with a number of third party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting purposes so we can improve the way we communicate.

We use websites such as Youtube to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third party website for more information about their cookies and how to manage them.

BHN also uses third party suppliers such as Facebook and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts.

## How we treat children and vulnerable persons

### Aged 18 or under

We do not actively seek to collect children's data, and are most likely to do so when children accompany their parents' or guardian to an event. If at any time we create any materials which may lead to someone aged 18 or under providing their details, we make it clear that they should make sure that they have your parent's /guardian's permission first, before giving us their personal information.

### Supporters in vulnerable circumstances

We recognise the importance of identifying and supporting supporters in vulnerable circumstances. If staff who come into contact with supporters identify signs of vulnerable circumstances, they will deal with the supporter appropriately in accordance with our policies.

Personal information will be recorded so that we may respond appropriately in future, for example by ceasing donations requests.

## Your choices and telling us when things change

### Preferences

You can change your preferences on what you receive from us, including communications and fundraising materials, or how we contact you, by mail, phone or email, at any time.

You can do so by: Emailing us on: [contact@bhn.org.uk](mailto:contact@bhn.org.uk)

Write to us at: BHN, Easton Family Centre, Beaufort St, Easton, Bristol, BS5 0SQ

### Telling us to stop storing your data

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at: BHN, Easton Family Centre, Beaufort St, Easton, Bristol, BS5 0SQ

## Access to your information

### Your rights

You have the right to request details of the information we hold about you. To receive a copy of the personal information we hold please write to our Data Protection Officer at the address given below, enclosing a cheque for £10 made payable to Bristol Hospitality Network. We will respond within 40 days of receiving your letter.

For more information about your rights under the Data Protection Act you can visit the website of the [Information Commissioner's Office](#).

## Changes to BHN's Privacy & Security Policy

### Changes to this policy

This policy was last updated in February 2018. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy we will show this clearly on our website, in our publications or by writing to you directly. By continuing to use our website you will be deemed to have accepted these changes.