



PRIVACY POLICY

POLICY CONTROL

Version	Description	Date	Approval
1.0	Privacy Policy	May 2023	Board
1.1	Full update after Trussell Trust recommendations	March 2024	
2.0	Board approval	11 June 2024	
Next Review:		June 2027	
Data Protection Lead		Nick Appleby (Trustee)	

LINKED POLICIES & DOCUMENTS

Data Protection Policy & Data Protection Statements

Data Retention Schedule

APPENDICES

A – Personal Data Notice (for display at Foodbank sites)

B – Online & Cookies Policy

PRIVACY POLICY

1. INTRODUCTION

- 1.1. Newquay Foodbank is a data controller registered with the UK [Information Commissioner's Office](#) registration number A8753034. Newquay Foodbank is also a data processor on behalf of the Trussell Trust – foodbank visitors' data is held on the Trussell Trust's DCS database. The Trussell Trust's controller reference is Z279027X.
- 1.2. Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.
- 1.3. We have policies, procedures, and training in place to help our team understand their data protection responsibilities and follow the principles of data protection.
- 1.4. We have a nominated member of staff who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email dataprotection@newquayfoodbank.co.uk
- 1.5. The term "staff members" is used in Newquay Foodbank's policies to refer to any employees, volunteers, trustees or contractors that are 'working' for the Foodbank. "Foodbank visitors" is the term used to describe the beneficiaries of the Foodbank.

2. PRIVACY STATEMENT

- 2.1. This privacy policy relates to personal information that Newquay Foodbank collects and uses. We are an independent charitable organisation which is part of the Trussell Trust Foodbank Network. We share personal information about foodbank use with the Trussell Trust which is a separate data controller. The Trussell Trust supports a network of over 1,200 foodbank centres throughout the UK which together make up the Foodbank Network.
- 2.2. For more information about who we share your personal data with, please visit the "Sharing personal information" section below.

3. HOW WE COLLECT PERSONAL INFORMATION

- 3.1. We may collect your personal information from you directly when you:
 - communicate with us for any reason, by post, telephone, text, email or via our website
 - make a donation
 - visit a food bank or are referred to a food bank
 - participate in a survey or research
 - work or make an application to work or volunteer for us
 - agree to help us promote our work
 - interact with us as a supplier, contractor, consultant or in any other capacity.

We may also collect personal information about you from other organisations. For example, from a referral agency like a doctor's surgery, when you are referred to the food bank.

4. PERSONAL INFORMATION COLLECTED

4.1. We only collect personal information that we genuinely need. This may include:

- Contact details such as name, address, email address and phone numbers
- Date of birth and gender
- Nationality
- Any information that you give us relating to your circumstances and why you used a food bank
- Financial information that you provide to us, for example, when making a donation
- For job and volunteer applicants:
 - your bank account details, tax and residency status
 - references from previous employers or educational institutions
 - contact details for your family members and next of kin
 - qualifications
 - information concerning your health and medical conditions
 - information about your race, ethnicity and sexual orientation
 - details of criminal convictions.

5. OUR LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

5.1. Our legal basis for processing personal information is usually for our legitimate interests, or your consent, or for the performance of a contract or to meet our legal obligations.

5.2. We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

5.3. We will ask you to opt in to receiving marketing emails and text messages from us. You can unsubscribe from this at any time.

5.4. Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe someone's life is at risk.

5.5. We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract), or because we are legally obliged to do so, for example to meet employment or charity laws.

6. WHY WE COLLECT PERSONAL INFORMATION

We collect and use personal information about people who use food banks, supporters, job applicants and volunteers for a number of reasons.

6.1. Assisting people that use Foodbanks. We collect personal information from you directly if you have to use to use a food bank, or via an organisation that refers you to a food bank. Our legal basis for using this information is legitimate interest as we wish to respond to your need for help, and ensure that we are providing help when and where it is most needed. We will share this information with the Trussell Trust which works with us and other food banks to support our network and uses

anonymised statistical data to campaign at a national level to challenge the structural issues that lock people into poverty.

- 6.2. Developing relationships with supporters.** Our work is made possible because of the generosity of our supporters. We need a good understanding of our supporters so that we can communicate with them effectively and appropriately. We will only send you marketing communications via email or text where you have opted in to receiving them. You can unsubscribe from receiving these communications at any time.
- 6.3. Processing donations.** If you kindly make a donation to us (of food or money), we will use your personal information to collect your donation and maintain a record of our supporters. Our legal basis for using your personal information for this purpose is to fulfil our legitimate interest and fundraising objective. We are legally required by HMRC to collect some personal information if you choose to gift aid your financial donation.
- 6.4. Dealing with complaints and appeals.** If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal. This may include sharing relevant information with the Trussell Trust or person that the complaint has been made about. Our legal basis for using personal information for this purpose is legitimate interest.
- 6.5. Promoting our work.** We will use personal information that you share with us if you agree to help us promote our work. This might include photographs and videos. For example, we may use your information in case studies and stories that we publish or share with the media. We will only use your information for this purpose if you have given your consent for us to do so.
- 6.6. Carrying out surveys and research.** If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We may use a university or work with The Trussell Trust to undertake analysis of survey responses. Survey results are anonymised before being shared or published.
- 6.7. Staff members administration and development.** We will process personal information of our employees to fulfil our contract with them, and to meet our legal obligations as an employer. This includes payroll processing and the provision of training. We are required by law to share some financial information with the HMRC. We may also need to share some personal information with other organisations, for example solicitors, pension providers. Where you volunteer with us, we collect personal information to support the administration of your volunteering activity. Our lawful need for processing volunteers' personal information is our legitimate interest or to meet our legal obligations. We share personal information about our staff members with the Trussell Trust to support the work of the Foodbank Network.
- 6.8. Recruitment.** If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your enquiry. We will not store this information for any purpose other than that relating to your application. Our legal basis for using your information in this way is for our legitimate interest.
- 6.9. Safeguarding activities including DBS checks.** When necessary, we process relevant personal information about staff members for safeguarding purposes. This

might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of. It may be necessary to share some personal information with relevant authorities such as the police. Our legal basis for this processing is to meet our legal obligations.

6.10. Processing expenses. We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.

6.11. Governance. We process relevant personal information about existing and potential trustee members for governance purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees. Our legal basis for this processing is to meet our legal obligations with the Charity Commission and Companies House.

7. SHARING PERSONAL INFORMATION

7.1. We will only share your personal information where we need to, where someone's life is at risk or we are required to do so by law.

7.2. We may share your personal information with the Trussell Trust which is a separate data controller. The Trussell Trust directly supports over 1200 food bank centres throughout the UK which together represent the Foodbank Network. Where we share your personal information with Trussell Trust we will inform you as outlined in the section "Why we collect personal information" above. We have a data sharing agreement in place with Trussell Trust which sets out what information is shared, why and how we share the data.

7.3. We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers. We have data processing agreements or clauses in place with any data processors that we may use.

7.4. We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.

7.5. Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

7.6. Where you have specifically provided your approval we may share your data with third party organisations eg Citizen's Advice in order to make a referral on your behalf to these agencies.

8. COOKIES AND AGGREGATE INFORMATION COLLECTED FROM OUR WEBSITE

8.1. We use cookies on our website to store information about how you use our website. A cookie is a piece of data stored on the user's computer tied to information about

the user. This enables us to make navigation easier and direct you to information that best corresponds to your interests and country.

8.2. Aggregate information is collected from users using Google Analytics. This information includes users' Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages and number of unique visits. This information is not linked to personal profiles or to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer the website and to gather broad demographic information of our website users.

8.3. To view our **Online & Cookies Policy** see **Appendix B** of this document or visit <https://newquay.foodbank.org.uk/privacy-cookies-policy/>

9. YOUR RIGHTS

9.1. If you no longer wish to receive communications about products and services from us, please contact dataprotection@newquayfoodbank.co.uk

9.2. You can also unsubscribe at any time to emails that we may send to you about the products and services that we think will be of interest to you. A link to unsubscribe from all direct marketing will be included in any communications.

9.3. You also have the right to:

- Ask us for copies of your personal information.
- Tell us to change or correct your personal information if it is incomplete or inaccurate.
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you.

There are specific Data Privacy Statements for each group of Foodbank data subjects ie staff members; supporters; foodbank visitors; food donor groups; referral agencies and funders. If you would like to see the Data Privacy Statement that applies to you, or for all requests regarding your data please contact our Data Protection Lead and Trustee – Nick Appleby at 07469 731426 or dataprotection@newquayfoodbank.co.uk
We will respond to any request within 28 days.

Please note that we may be entitled to refuse requests where exceptions apply, for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

10. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

10.1. We will hold your personal information only for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes. We have in place a personal Data Retention Schedule which sets out how long we keep your personal information for.

11. REVIEW

11.1. This policy and its implementation will be reviewed at least annually or where legislative changes occur. We recommend that you please visit our webpage periodically to keep up to date with the changes in our Privacy Policy and read this in conjunction with the Data Protection Policy and Statements.

12. MAKING A COMPLAINT TO THE INFORMATION COMMISSIONER'S OFFICE

12.1. 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 which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.



PERSONAL DATA NOTICE

We use your personal information to help understand your needs and provide you with emergency food. Newquay Foodbank and the Trussell Trust are data controllers and have a legitimate interest to use information about you for statistical and research purposes, to show how food banks are being used and why they are needed.

Access to your information is restricted and can only be seen by the agencies who refer you, and authorised people in the Trussell Trust food bank network who need to do so for food bank reasons.

Where you are asked for special category (sensitive) information, we will explain why, and you can choose not to answer if you prefer without this affecting the support you receive. You can withdraw your permission at any time and we will stop using your personal information.

Your personal information is stored in the UK and kept for six years from the date you last received a food parcel.

You have the right to receive a copy of the information we hold about you, and the right to request that we correct anything you believe to be inaccurate and to request we delete your information if we have no need to keep it.

To find out more about your rights or about how we keep your information safe, visit <https://trusselltrust.org/privacy> or you can obtain the Privacy Policy from Newquay Foodbank's website. Please ask the foodbank to give you a copy of their privacy statement.

The Trussell Trust Information Commissioner's Office registration number is Z279027X. Newquay Foodbank's Information Commissioner's Office registration number is ICO ref: A8753034.

APPENDIX B

PRIVACY & COOKIES

ONLINE PRIVACY POLICY

Newquay Foodbank is committed to protecting your privacy when using our online services and will process any personal data in accordance with the current Data Protection Legislation. In this policy we explain how and why we collect your information, what we do with it and what controls you have over our use of it.

From time to time, we will add or change functions, features or products to our website or add or change Services. This, and our commitment to protecting the privacy of your personal information, may result in periodic changes to this Privacy Policy. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

Any questions regarding our Privacy Policy should be directed to

Dataprotection@newquayfoodbank.co.uk

Your acceptance of these Privacy Statement terms

By using our website, you unconditionally agree to be bound by this Privacy Policy.

Why do we collect data?

Newquay Foodbank collects and processes information about you in order to;

- (i) identify your device, browser and operating system to enhance your web experience with us;
- (ii) improve our Services and website;
- (iii) carry out research on the demographics, interests and behaviour of users
- (iv) send you information we think you may find useful, to keep in touch with you and supply you with information relating to our work

You may be asked for information about yourself, such as your name, e-mail address, postal address and telephone number when you attempt to contact us. You are under no obligation to provide this information, but if you don't then we may not be able to provide you with the best service.

Log Files/IP Addresses

When you visit our website, we automatically log your IP address (the unique address which identifies your computer, or mobile device, on the internet) which is automatically recognised by our web server. We use IP addresses to help us administer our websites and

to collect broad demographic information. Non-personal information about you is used to collect such information as the type of internet browsers used, the site from which you linked to our websites or the type of device you are using to access our website. You cannot be identified from this information and it is only used to assist us in providing an effective service on our websites as stated in “why do we collect data”.

How long do we store your data?

We will keep the information and data relating to your use of the website only for as long as we consider it necessary in relation to the reasons we set out in “what data do we collect and how do we use it.”

Where is the information stored?

Information which you submit via our website is stored on a computer located in the European Economic Area (This is necessary in order to process the information and to send you any information you have requested). In addition, if you use our Services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those Services.

Security

Newquay Foodbank places a great importance on the security of all information associated with our users. We have security measures in place to protect against the loss, misuse and alteration of any user data under our control.

For example, our data protection and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to user information.

With regard to our websites, we use secure server software (SSL) to encrypt financial information you input before it is sent to us. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur, we use our best efforts to prevent this.

Information about Products and Services

It is very important to us that we provide you with the highest level of service. If you have subscribed to regular updates from Newquay Foodbank we may send you details of activities and opportunities which we think may be of interest to you. If at any time you do not wish to receive these details, please e-mail us at

dataprotection@newquayfoodbank.co.uk. *In this instance, we may keep suppression data*^[1] – this is a record that you have either unsubscribed or indicated that they you no longer wish to be contacted by us. We retain just enough data to make sure that you are not included in any future communications.

COOKIES POLICY

---Use of Cookies

Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about your activity on a website. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. However, you may not be able to take full advantage of a website if you do so. First party cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Third party cookies are added by scripts added to the website, examples include Facebook, Twitter and YouTube. Although they do identify a user's computer, cookies do not personally identify customers or passwords. Credit card information is not stored in cookies.

Cookies We Use and Why

- **Necessary**

CookieConsent: Stores the user's cookie consent state for the current domain

- **Statistics**

_dc_gtm_UA-#: Used by Google Tag Manager to control the loading of a Google Analytics[2] script tag.

_ga: Registers a unique ID that is used to generate statistical data on how the visitor uses the website.

_gat: Used by Google Analytics to throttle request rate

_gid: Registers a unique ID that is used to generate statistical data on how the visitor uses the website.

- **Marketing**

ads/ga-audiences: Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.

Collect: Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.

PREF: Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites.

VISITOR_INFO1_LIVE: *Tries to estimate the users' bandwidth on pages with integrated YouTube videos*

YSC: *Registers a unique ID to keep statistics of what videos from YouTube the user has seen.*

How do I change my cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

Our website contains links to the sites of third parties. When you visit these sites, we suggest that you read their privacy policies. Newquay Foodbank is not responsible for the privacy policies or the content of such sites.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

Social Media (applicable to Foodbanks who run social media accounts ONLY)

Newquay Foodbank also maintains a presence on social media channels including Facebook & X.

If you share content from one of Newquay Foodbank social media websites, a cookie may be used by the service you have chosen to use to share that content. Newquay Foodbank does not control these cookies. You should check the relevant third-party main website for more information.

Your right to information

You have the right to a copy of the information we hold about you. This is known as a subject access request. For more information on this, please visit: <https://ico.org.uk/for-the-public/personal-information/>

Comments

Please e-mail any questions, concerns or comments you have about cookies to Dataprotection@newquayfoodbank.co.uk

[1] A record of those who have unsubscribed is referred to as suppression data. If a supporter clearly indicates that they no longer wish to be contacted, it is extremely important that their wishes are honoured. This is best done by keeping a suppression data record. This should contain just enough data to make sure that the party is not included in future communications – e.g. name, address, email address, and date of unsubscribe.

[2] Google Analytics is a free web analytic service that provides statistics and basic analytical tools for search engine optimisation and marketing purposes for the managers of online content.
