



## **SYMBOL PRIVACY POLICY**

### **INTRODUCTION**

Symbol respects your privacy and is committed to protecting your personal data and/or private information that you share with us.

This Privacy Policy will tell you how we look after your personal data /and or private information and inform you of your privacy rights and how the law protects you.

### **1. IMPORTANT INFORMATION AND ABOUT SYMBOL**

#### **PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy aims to give you information on how Symbol collects and processes your personal data through the use of our services, including any data you may provide when applying for an assessment, request a service from us, or want to fundraise for us.

This Privacy Policy explains:

- What types of personal information we collect
- How we will use that information
- How long we keep that information
- How we store your information
- How and when we share your information with others
- How you can access and update your information
- How you can change or stop us communicating with you

#### **DATA CONTROLLER**

Symbol is the controller and is responsible for your personal data (collectively used as, 'we', 'us', or 'our' in this Privacy Policy).

#### **DATA PROTECTION OFFICER**

Bharat Thakerar is the Data Protection Officer for Symbol. You can contact Bharat via email [Bharat.Thakerar@symbolconnect.co.uk](mailto:Bharat.Thakerar@symbolconnect.co.uk) or call +44 (0)1622 863 291 or +44 (0)7872 917 033

#### **CONTACT DETAILS**

Our full contact details are:

Symbol FSS a limited company in England and Wales with registered number 04408770

Symbol UK a limited company in England and Wales with registered number 03557960

The Symbol Trust a charity in England and Wales with registered number 1097042

Postal Address: Unit 3, Little Caring Farm, Caring Lane, Maidstone, Kent, ME17 1TH

You have the right to make a complaint at any time to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues ([ico.org.uk](https://ico.org.uk)) in the UK; please read <https://ico.org.uk/for-the-public/raising-concerns/> for details of how to do this.



We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance

## **2. WHAT IS PERSONAL DATA?**

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).

For example, Personal Data could be your name, postal and email addresses, telephone number and / or your bank details if you are donating to us.

## **3. WHY SYMBOL NEEDS TO COLLECT PERSONAL DATA**

Symbol exists to:

- Work with people with learning disabilities and autism with the purpose of releasing potential and enabling them to live truly fulfilling lives by providing inspired and individually designed support.
- Pioneer and share 'leading edge' practice that drives up standards and opportunities for people with learning disabilities across the UK.

So we can continue to do this, we need to be able to communicate effectively with you. Collecting your data helps us do this the best we can.

It is important that you read this Privacy Policy together from time to time so that you are fully aware of how or why we are using your data.

## **4. HOW IS YOUR PERSONAL DATA COLLECTED?**

Symbol uses different methods to collect data from and about you including through:

- Direct interactions: You may give us your personal data by using our website, filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- o Request information on our services to be sent to you
- o Request or engage a service from Symbol
- o Request updates from Symbol
- o Give us feedback
- o Set up a Direct Debit
- o Make a donation to The Symbol Trust
- o Add Gift Aid to your donation to The Symbol Trust
- o Purchase a product at our shop, Hop, Stitch & Jumper or through our online shop
- o Donate to our shop, Hop, Stitch & Jumper
- o Fundraise or volunteer for us



- Through Third Parties: We may collect and share information through third parties, who are other organisations that we collect data from.

For example, we may collect or share data with the following providers:

- Essential Service Providers: Sometimes other businesses give us data about you which we may need for our legitimate interests of conducting business with you and on occasion they are necessary to perform our contract with you. It usually comprises financial, medical or legal data.
- Professional Advisers: We may also share your data with professional advisers such as lawyers, medical professionals or insurers.
- Law Enforcement/Legal Compliance: We will cooperate with law enforcement requests from within or outside the UK. This may include disclosing your personal information to government or law enforcement agencies, or private parties, when we have a good faith belief that disclosure is required by law or when we, in our discretion, believe that disclosure is necessary to protect our legal rights, or those of third parties and/or to comply with a judicial proceeding, court order, fraud reduction or legal process served on us.
- Fundraising or Online Giving Providers – such as Just Giving in relation to The Symbol Trust.
- Social Media Platforms like Facebook, Twitter and Instagram – when you visit or interact with our Symbol Connect Social media sites, if you have given permission to share this with us

We only ever collect information from third parties if you have given them your permission and in line with their privacy policies.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and they may only use your data for the purposes we specify in our contract with them. We will always work with third parties to protect your privacy.

## **5. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to.

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- Provide information requested on Symbol or any of our services, for example: Symbol UK, Symbol FSS, The Symbol Trust, The Hopshed Theatre Company, Hop, Stitch & Jumper, The Hopyard.
- Keep a record of any communications between supporters or service users of Symbol, such as emails and phone calls.
- Keep a record of guest attendance at fundraising events for The Symbol Trust
- Processing financial donations to The Symbol Trust, for example, attending a paid event or setting up Direct Debit to The Symbol Trust
- Monitoring how Symbol communicates with supporters or service users, including:



- Contact preferences
- Type of information requested to receive
- Events
- Fundraising projects
- How you can support The Symbol Trust
- Responding to queries or complaints

Symbol will not sell information to any third party organisation.

## **6. HOW SYMBOL STORES INFORMATION:**

Symbol has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

The server network which Symbol utilises is protected and systems are regularly reviewed. Appropriate technical procedures are in place to protect your personal details.

In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **7. DATA RETENTION**

Symbol will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or accounting, or reporting requirements.

Information held is regularly reviewed by Symbol and information no longer required is deleted appropriately

Details of personal data will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements unless the law prescribes a longer period.

## **8. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under UK data protection laws in relation to your personal data.

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.



- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it for example where you consider that we do not need it any longer for the purposes for which we originally collected it, where you have withdrawn your consent to our using it and where you consider that we cannot show a 'legitimate interest' in continuing to process it.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month.

### **FURTHER INFORMATION**

If you require any further information, please email Symbol at [info@symbolconnect.co.uk](mailto:info@symbolconnect.co.uk) or call +44 (0)1622 863291

**Last Updated – 18<sup>th</sup> May 2020**