

Website Privacy Policy

At Right There, we are committed to maintaining the trust and confidence of our visitors to our website. We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how their personal information will be looked after and used. This Privacy Policy sets out how we collect and use personal information that we collect from visitors to our website.

Who we are

Right There (“we”, “us”, “our”) is a charity in Scotland and our registered charity number is SC017093. We are the controller and responsible for your personal information.

We have appointed a person with responsibility for data protection who is responsible for overseeing any data protection queries. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the contact details set out below.

David Pieroni
Right There
15 Dava Street
Glasgow
G51 2JA
E-mail: DataProtection@rightthere.org

Changes to this Privacy Policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 1 April 2022. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Further information of our processing

It is important that you read this Privacy Policy together with any other privacy policy or privacy notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using personal information. This Privacy Policy supplements our other notices and policies and is not intended to override them.

Links to Other Web Sites

This Privacy Policy may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Types of personal information we collect

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

We may collect, use, store and transfer personal information about you which includes the following types of data:

- **Identity data** including name, title and gender;

- **Contact/query data** including address, email and content of any query ;
- **Financial data** including bank account and payment card details;
- **Transaction data** including details about payments;
- **Technical and browsing data** includes internet protocol (IP) address, browser type and version, browser plug-in types and versions, operating system and platform, and other technology on the devices used to access this website;
- **Usage data** including information about use of our website;
- **Marketing and communications data** including preferences in receiving marketing from us; and
- **Personal stories** including photos and stories of those we support, our staff, volunteers, or other people who are involved in the work we do. This may include the processing of special category data, and additional safeguards will be taken by us to protect such data.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. aggregated data could be derived from personal information but is not considered personal information in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

If you fail to provide personal information

If we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you.

How we use your personal information

We may use your information to:

- Get in touch with you if you have signed up for one of our courses or events and/or to provide you with services, products or information and respond to your queries;
- Fundraise and process donations;
- Manage, administer and protect our charity and operations;
- Carry out our obligations arising from any contracts entered into by you and us;
- Seek your views or comments on the services we provide;
- Notify you of changes to our programmes;
- Send you marketing and communications which you have requested or that may be of interest to you. These may include information about the vital work we do, campaigns, appeals, other fundraising activities, volunteering and support opportunities, and events;
- To comply with our legal obligations;
- To raise awareness and to promote our work;
- Dealing with issues and complaints and participating in legal proceedings;
- To monitor and improve the use of our website, products and services; and
- To deliver relevant website content and to understand the use of our website.

Marketing

We will only send you marketing and fundraising communications and newsletters if you have provided your consent. You may opt out of these communications at any time by clicking ‘unsubscribe’ or by contacting **David Pieroni** at DataProtection@rightthere.org.

Our legal grounds for processing

We have set out below the legal grounds we rely on to use and otherwise process personal information. We may process personal information using more than one lawful ground depending on the specific purpose for which we are using personal information.

Legitimate interest. We rely on legitimate interest, which is the interest of our charity in operating and managing our charity to enable us to provide the best service, assistance and information. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities

where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). For example we use legitimate interest in the following circumstances:

- To operate, administer, manage, develop, grow and raise funds for our charity;
- Promotion and developing marketing strategies;
- Keeping records;
- Understanding how our services and website are used and who our supporters are;
- Providing information about issues we care about such as homelessness and mental health;
- Running events and taking and using photos and/or films of attendees;
- Improving and developing our services; and
- Operating and ensuring security of our website.

Consent. In many cases, we will obtain your consent to process your personal information. For example, where we are required to obtain consent to send you direct marketing or where we use your personal stories. Where we use your personal stories, we always ensure you are made aware of what platforms they may be shared on. Platforms that we share images on may include: internal newsletters, Facebook, Twitter, Instagram, and our website. You have the right to request that your personal information not be used on any or all of these platforms or to have personal identifiable details changed. We retain the rights to any images taken by us. You have the right to withdraw your consent at any time.

Performance of a contract. At times we may need to process personal information where this is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.

Legal obligation. In some cases we may be required to process personal information where the processing is necessary for us to comply with the law.

International Transfers

We do not transfer your information out with the UK or the EEA.

Disclosures of your personal information

We may disclose personal information for the purposes mentioned in this Privacy Policy to third parties, such as:

- Our suppliers and service providers such as IT service providers such as Google, Stripe and Mail Chimp.
- Our professional advisers.
- Where we are under a duty to disclose personal information to comply with a legal obligation (for example to regulators and other relevant authorities).

How does Right There protect data?

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a valid need to know.

We have 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.

For how long does Right There keep data?

We will only retain personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation.

To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of personal information, the purposes for which we process the personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We review all the information set out in personal stories yearly and may contact you to ask if anything should be updated.

How to withdraw consent

You can withdraw consent, including request for your image, story or case study to be removed at any time. To do this, or to request further information, please contact David Pieroni, Head of Transformation, at DataProtection@rightthere.org.

Your rights

You have a number of rights which may be exercised in certain circumstances. You can:

- Request access to and obtain a copy of your data.
- Request Right There to change incorrect or incomplete data.
- Require Right There to delete or restrict the processing of your data, for example where the data is no longer necessary for the purposes of processing.
- Object to the processing of your data.
- Request restriction of processing your personal information.
- Request transfer of your personal information.
- Withdraw your consent.

If you would like to exercise any of these rights, please contact David Pieroni, Head of Transformation, who has been appointed as the person with responsibility for data protection compliance within Right There. They can be contacted at DataProtection@rightthere.org. Questions about this policy, or requests for further information, should be directed to them.

You also have the right to make a complaint to the Information Commissioner's Office, the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

COOKIES POLICY

We use a system of classifying the different types of cookies which we use on the website, or which may be used by third parties through our website. The classification was developed by the International Chamber of Commerce UK and explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your device.

What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website, if you agree. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at www.allaboutcookies.org and www.youronlinechoices.eu

How long are cookies stored for?

Persistent cookies –

These cookies remain on a device for the period of time specified in the cookie (this is a maximum of 2 years). They are activated each time that the user visits the website.

Session cookies –

These cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies used on the Website

We use four categories of cookies:

Strictly necessary cookies

These cookies are essential for the operation of our website and in order to enable you to move around the website and use its features.

Performance cookies

These cookies collect information on the pages visited and how visitors use the website (for instance which pages visitors go to most often, and if they get error messages from web pages). We do not see information that identifies a visitor - all information these cookies collect is aggregated. It is used to improve how the website works.

Functionality cookies

These cookies remember choices you make to improve your experience.

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.

Third party cookies

These cookies allow third parties to track the success of their application or customise the application for you. For example, if you view a YouTube video embedded on our website or choose to 'share' content through Twitter or other social networks you might be sent cookies from these websites. We don't control the setting of these cookies, so please check those websites for more information about their cookies and how to manage them. Because of how cookies work we cannot access these cookies, nor can the third parties access the data in our cookies used on our site.

We use a third-party service, Google Analytics, to gather information on our visitors. This information helps us understand where our website traffic is coming from, what articles and sections of the site are being viewed and for how long. This is done through cookies and code which is embedded on our websites. This information is only presented to us in a way which does not identify anyone. We do not find out the identities of those visiting our website. For further information, please refer to our Cookies Policy below.

No cookies, please

You can choose which cookies we can set when you visit our website. Find out how to control and delete cookies in your browser. We have set up a plugin that allows you to control what cookies you want to accept. However, if you choose to refuse all cookies, our website may not function for you as we would like it to and you may not be able to access all of parts of our website.