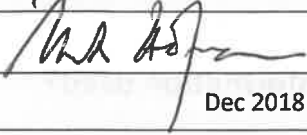


# Privacy and Cookies Policy

## Assisted Reading for Children Ltd (ARCh)

Version Control	
Approved by Board of Trustees (Date)	4. Dec. 18
Signed	
Version	Dec 2018
Policy became operational on:	
Next Review Date	

## Privacy and Cookies

Assisted Reading for Children Ltd (ARCh) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our pupils, current, former and prospective schools, job applicants, our current and former employees, current, former and prospective volunteers, individual donors and supporters, corporate sponsors, fundraising event participants and suppliers. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We would encourage you to read the information below. This policy is compliant under the Data Protection Act (2018) and the General Data Protection Regulation (GDPR). Last update June 2018.

### Who are we?

ARCh Oxfordshire is the trading name of Assisted Reading for Children, a company limited by guarantee registered in England and Wales, company registration number 7962217, registered charity number 1146276. Our registered office address is: Gobles Court, 7 Market Square, Bicester, Oxfordshire, OX26 6AA. Assisted Reading for Children Ltd (ARCh) is a registered data controller (ICO registration number Z1643859).

### How do we collect data or information?

We collect personal information about you when you:

- Fundraise on our behalf (e.g. through taking part in an event)
- Work with us as a service user
- Make an enquiry via our website or via the telephone
- Use our website
- Enquire about a job opportunity
- Become a trustee or patron
- Volunteer for us
- Work for or with us
- Exchange correspondence and/or business cards with a member of our staff

And to provide updates and relevant information on how you can support the charity

### How is your information used?

We collect your personal data or information to operate the charity effectively and provide you with a high-quality service. We may use your information:

- To deliver tailored services to children at your request.
- To answer enquiries that you make to us.
- To process a job or volunteer application
- To fulfil our obligations as an employer
- To provide benefits to you as an employee
- To adhere to regulations set out by the Charities Commission or Fundraising Regulator
- To manage fundraising events you are taking part in
- To administer your donation or support your fundraising, including processing Gift Aid;
- To keep you informed about the work we're doing, following a donation you have made
- To send you our newsletter, if you have consented to receive it.
- To maintain security of our office and IT infrastructure
- To invoice you, and to track payments you make or payments made to you

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting the charity, our contractual requirements to deliver agreed services to you (or your family member), and our legal obligations, both as a charity and responsible employer. The exception is for sending email marketing, which we carry out on the basis of consent. If you would like to know more, please read below:

### ***Pupils***

We will hold the following information about pupils:

- Name (*optional*), age, gender and year group.
- Reading level
- Information on why the child has been selected for help
- Pupil survey for current academic year
- Information and documents relating to the service we are providing, including communications with the school.

We store your information in our database on our secure servers based in the European Economic Area (EEA). We may also hold paper copies of your information, stored securely at our Bicester office. Communications with the school will be stored in our email system, which we use Microsoft Office 365 to manage.

We currently use third-party online tools:

- Smart Survey is used by Research Oxford to manage the collection of the Pupil Survey, which may contain some of your information. Smart Survey uses servers that are based within the EEA. For more information please view their [Privacy Policy](#).

We will retain your information for the duration of our relationship with you, then for 12 months after. If your parent/guardian has agreed for us to use your experience with Assisted Reading for Children Ltd (ARCh) as a case study to help us promote the charity, we may continue to hold your data beyond the typical 12-month period.

### ***Schools***

We will hold the following information relating to schools:

- Names and emails of staff.
- Comments from staff (quotes from feedback forms, Child Details forms etc.)
- Pupil survey comments

We store your information in our database on our secure servers based in the European Economic Area (EEA). We may also hold paper copies of your information, stored securely at our Bicester office. Communications with the school will be stored in our email system, which we use Microsoft Office 365 to manage. We will retain your information for the duration of our relationship with you, then for 12 months after.

### ***Job Applicants***

When you apply for a job with us, we may hold the following information about you:

- Name, date of birth, and contact information.
- Information relating to your qualifications and experience
- Demographic information such as postcode
- References where we take them up
- Information and documents relating to the review, interview and selection process, including communications with you.

We store your information on our secure servers based in the EEA. We may also hold paper copies of your information stored in the Bicester Office. We will also store communications with you relating to the interview process in our email system, which we use Microsoft Office 365 to manage. We will retain your personal data relating to the review, interview and selection process for a minimum period of 6 months and a maximum period of 1 year after the interview date.

### ***Current and Former Staff***

When you work for us, we may hold the following information about you:

- Name, date of birth, and contact information
- National insurance number and Unique Tax Reference (UTR)
- Information relating to your qualifications and experience
- Demographic information such as postcode

- Information and documents relating to your performance and supervision as an employee of the charity, including communications with you
- Your photograph
- Disclosure and Barring Service (DBS) certificate.
- Financial information, such as bank details, pension scheme and salary details
- Information about your next of kin
- Health information
- You will be allocated an archoxfordshire.org.uk email address which will contain your first name

We store your information in on our secure servers based in the UK and in hard copy in a secure filing cabinet in the Bicester office. We will also store communications with you in our email system, based in the EEA.

We currently use third-party online tools:

- Xero and Able Internet Payroll to manage the payroll, which will contain some of your personal information. Xero uses servers that are based outside the EEA, they are a registered data processor with Privacy Shield. For more information please view their [Privacy Policy](#). For information on Able Internet Payroll, [click here](#).

We will retain your personal data for the duration of your employment and for a period of 7 years after you leave the charity. Beyond this point, we only retain minimal information about you to confirm the period of time you were employed by the charity for reference purposes.

We share your information with HMRC, NEST (pension).

### ***Current and Former Volunteers***

When you volunteer for us, we may hold the following information about you:

- Name, date of birth, and contact information
- Photographs
- Information relating to your qualifications and experience
- Demographic information such as postcode
- Disclosure and Barring Service (DBS) certificate.
- Information and documents relating to your role as a volunteer for Assisted Reading for Children Ltd (ARCh), including our communications with you
- Information about your next of kin
- Bank details
- Video of individual volunteer stories

We store your information in on our secure servers based in the EEA and in hard copy in a secure filing cabinet in the Bicester office. We will also store communications with you in our email system, which we use Microsoft Office 365 to manage.

We currently use third-party online tools:

- Xero to manage expenses and travel payments, which will contain some of your personal information. Xero uses servers that are based outside the EEA, they are a registered data processor with Privacy Shield. For more information please view their [Privacy Policy](#).

We will retain your personal data for the duration of your time volunteering with us and for a period of 7 years after you leave the charity. Volunteers stories are uploaded to our YouTube channel and made available on our website [www.archoxfordshire.org.uk/what-we-do/](http://www.archoxfordshire.org.uk/what-we-do/).

### **Corporate Sponsors / Donors**

If your business is supporting ARCh as charity of the year or on an on-going basis, we may hold the following information on you, if you are involved in their activities:

- Name and email address
- Business details
- Information relating to your business activities
- Information relating to your fundraising activities and our communications with you
- Photographs of you participating in fundraising activities
- Donation amount
- Newsletter preferences (opt-in)
- Billing and Payment details

We store your information in on our secure servers based in the EEA and in hard copy in a secure filing cabinet in the Bicester office. We will also store communications with you in our email system, which we use Microsoft Office 365 to manage. We will store this information for 7 years after the donation was made.

### ***Individual Donors***

When you donate money to Assisted Reading for Children (ARCh), we may hold the following information about you:

- Name and email address.
- Donation amount
- Newsletter preferences (opt-in)
- Information relating to your fundraising activities and our communications with you
- Photographs of you participating in fundraising activities
- Bank details where you provide these to make a payment;
- Information as to whether you are a taxpayer to enable us to claim Gift Aid;

#### We use third-party tools

- The Big Give to accept donations, data is stored on secure servers hosted in the EEA. You can view The Big Give privacy policy [here](#).
- LocalGiving to accept donations, data may be stored on servers outside of the EEA. You can view their privacy policy [here](#).
- South Oxfordshire Charitable Lottery (SOCL) to accept donations, data is stored on secure servers hosted in the EEA. You can view SOCL privacy [here](#).

We will store this information for 7 years after the donation was made.

#### ***Individual Trustees and Patrons***

When you sign up to or join us as a trustee or patron, we may hold the following information about you:

- Name, date of birth and contact information.
- Information relating to your business activities (if relevant)
- Demographic information such as postcode, preferences and interests
- Information relating to you which helps ensure you enjoy the event, such as your dietary or access requirements and including our communications with you.
- Disclosure and Barring Service (DBS) certificate.
- Billing and payment information
- Health related information, where events involve physical activity.

We store your information in our Database on our own secure servers hosted in the EEA. We may also hold paper copies of your information stored in the Bicester Office. Communications with you will be stored in our email system, which we use Microsoft Office 365 to manage. We share information on our trustees with the Charity Commission, Companies House and our bank. Information about Trustees of the charity will be held indefinitely for historical purposes.

#### ***Suppliers***

When you work with the charity as a supplier, we may hold the following information about you:

- Name and business contact information.
- Information relating to your qualifications and experience
- Demographic information such as postcode
- Information relating to your business activities
- Information and documents relating to the services or products you offer, including our communications with you.
- Financial information

We store your information in Database on our secure servers based in the EEA. We will also store communications with you in our emails system. We will retain your information for the duration of our relationship with you and for 7 years after the last purchase we made with you.

### **Who has access to your information?**

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information on to third party service providers, agents or subcontractors for the purposes of completing a task or providing services to you on our behalf. However, we disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for other purposes.

Third party service providers who act as data processors on our behalf:

- Computer Clinic Bicester provide IT Support Services to Assisted Reading for Children Ltd (ARCh) and at times may be required to access our systems for maintenance, upgrade and support services. They cannot use the personal data we hold for their own purposes. You can see a copy of their Privacy Policy [here](#).
- Research Oxford collect the annual Pupil Survey information on behalf of ARCh, they will have access to Smart Survey for the purposes of collecting the survey responses. They cannot use the personal data (e.g. teacher name and volunteer name) we hold for their own purposes. You can see a copy of their Privacy Policy [here](#).
- Barnes4Business provide accountancy services to Assisted Reading for Children Ltd (ARCh) and at times will have access to our financial accounting records. They cannot use the personal data for their own purposes.

### **Transfers outside of the European Economic Area**

Your personal information in the European Economic Area (EEA) is protected by data protection laws, but other countries do not necessarily protect your personal information in the same way. The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. Assisted Reading for Children Ltd (ARCh) uses some online tools which host data outside of the EEA.



## **Your rights**

You have certain rights over the processing of your personal information by Assisted Reading for Children Ltd (ARCh). These are:

- The right to be informed, which is what this privacy policy is for
- The right to access the data we hold about you
- The right to object to direct marketing
- The right to object to processing carried out on the basis of legitimate interests
- The right to erasure (in some circumstances)
- The right to data portability
- The right to have your data rectified if it is inaccurate
- The right to have your data restricted or blocked from processing

We ask for your consent to send you direct marketing or fundraising information and will always provide you with the opportunity to amend your preferences or to opt-out of receiving future marketing communications from us. We will always thank you for any donation you make to us, without a request for further donations.

## **How you can update your information**

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, please email us at: [info@archoxfordshire.org.uk](mailto:info@archoxfordshire.org.uk) or by post at: Assisted Reading for Children Ltd (ARCh) is a registered charity (1146276) and our registered office address is: Gobles Court, 7 Market Square, Bicester, Oxfordshire, OX26 6AA.

## **How you can access your personal information**

You have the right to ask for a copy of the personal information Assisted Reading for Children Ltd (ARCh) hold relating to you. To do this please contact us by post at: Data Protection Manager, ARCh, Gobles Court, 7 Market Square, Bicester, Oxfordshire, OX26 6AA.

You also have the right to lodge a complaint about our processing of your personal data with the UK's [Information Commissioner's Office](#)

## **Keeping your data secure**

When you give us personal information we take steps to ensure that it's treated securely and strive to protect it on our internal systems. Our secure server systems encrypt your information.

## **Contacting us via email**

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

When we send email or respond to an email you sent to us, we use Azure Information Protection with Exchange Online. This gives us the ability to send protected emails using encryption technology to any recipient with the assurance that it can be read on any device.

## Visitors to our Website

### *Use of Cookies by this website*

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Unless you have set your browser to block cookies, our site will place the following cookies on your computer.

Cookie	Name	Purpose
Google Analytics	_ga _gid _gat	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information, including IP address, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
Twitter	ads_prefs dnt eu_cn guest_id personalization_id remember_checked_on tfw_exp	"Follow Button" Twitter plugin is used to help market the business using Twitter. The plugin detects whether a user is logged in to Twitter when he/she visits a website and uses this information to present either a "Follow" or "You Follow" message with various other details from Twitter. The plugin creates four ThirdParty cookies - pid, _twitter_sess, kdt, guest_id- if a visitor accesses the site when not logged into Twitter, and a further cookie if accessed while logged on to Twitter.
YouTube	SID, APISID, HSID, SAPISID, SSID, NID, PREF, ULS	These Google cookies are all typically written to the browser upon the loading YouTube videos.

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.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Google Analytics**

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help us analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for our website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this you may not be able to use the full functionality of this website

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

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **More questions?**

To contact Assisted Reading for Children Ltd (ARCh) with a data protection query regarding the processing of your personal data, please email [info@archoxfordshire.org.uk](mailto:info@archoxfordshire.org.uk) or write to us at our registered address Gobles Court, 7 Market Square, Bicester, OX26 6AA.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 17/06/2018.

