



Privacy Notice

What is the Girlguiding Gloucestershire privacy notice?

We all give our personal data out daily - our names, contact details, or other bits of information - and most of us want to be feel sure that our data is being handled properly.

As someone who is in contact with Girlguiding Gloucestershire, you may have given us information about yourself, like your name, or email address, or other details. Our privacy notice explains what Girlguiding Gloucestershire does with this information - it tells you how we gather, use, disclose and manage your personal data.

We take your privacy very seriously. We aim always to be clear to you about the way Girlguiding Gloucestershire manages data, so we make sure our privacy notice is up to date. You should read this page from time to time to check that you are happy with any changes we make.

Our privacy notice is as comprehensive as possible, but it doesn't cover every aspect of our collection and use of personal data. Please contact us if you need more information or have any questions about this notice. Our contact details are in the 'Get in touch' section below.

What does: 'Girlguiding', 'Girlguiding Gloucestershire', 'we' or 'us' refer to?

'Girlguiding Gloucestershire', 'Us', 'We' and 'Our' refers to the registered charity, The Guide Association - Gloucestershire (Charity no 302108)

Our registered/Head office address:

Girlguiding Gloucestershire
Activity Centre and HQ
Deer Park
Cowley
Gloucestershire
GL53 9NJ

In this notice we refer to 'Girlguiding', this is in connection to membership (GO) data. Girlguiding refers to the registered charity, The Guide Association (in England, Wales and Scotland) and the trading subsidiary, The Guide Association Trading Service Ltd (company no. 4301686). Girlguiding's registered charity number is 306016 (England and Wales) and SC038436 (Scotland).

We collect the following personal information (where relevant or applicable):

- Name
- Parents'/guardians' name(s)
- Contact details, including address, telephone number and email address
- Date of birth
- Payment information (bank details) if you donate to us or pay for Deer Park bookings or County events and trainings)
- Records of your correspondence with us
- Records of your participation with us (including as a member or as a volunteer)
- Donation history and gift aid details
- Information you enter on our website
- Photographs, video or audio recordings
- Biographical information
- Any other information you share with us

This information may be collected from:

- Girlguiding, via their membership system 'GO'. Girlguiding Gloucestershire has access to this data to use, amend, process and share. You can find out more information about how Girlguiding collect and process your personal data in their privacy notice
- Your computer or mobile device
- Information you fill out on the website (via digital forms and online surveys)
- Telephone or face to face conversations with you and/or your parent/guardian
- Local Girlguiding groups
- Third party companies and websites, like CAF Donate, Eventbrite, Just Giving, Virgin Money Giving and Committed Giving.
- Publicly available sources, like Companies House or the Charity Commission website
- Communication on social media

We sometimes also collect sensitive personal data, for example information about health, religion, sexuality, ethnicity, political and philosophical beliefs and criminal records. We normally only record this data where we have your consent but sometimes we are permitted to do this in other circumstances, under data protection law. For example, we may make a record that a person is in a vulnerable circumstance to make sure that we don't send fundraising messages to them - by doing this we comply with charity law and the Code of Fundraising Practice.

Why and how do you use my personal data?

Data helps us support and improve interactions with Girlguiding Gloucestershire. Examples include:

- Updating you on Girlguiding Gloucestershire's work, including newsletters and other publications
- Managing guiding activities and events
- Processing donations and claiming gift aid
- Appeals and fundraising activities including information about legacy gifts, raising funds or taking part in fundraising activities
- Investigating and responding to complaints, legal claims or other issues
- Fulfilling your bookings for Deer Park, including processing payments
- Assessing applications for volunteering and employment
- Information about events, activities and opportunities

We use marketing materials for the following:

- Updates about Girlguiding Gloucestershire's work, including newsletters and other publications
- Appeals and fundraising activities including requests for donations; information about legacy gifts, raising funds or taking part in a fundraising event, and updates on the impact that fundraising activities have had on our work
- Information about events
- Volunteering information about how to support Girlguiding Gloucestershire, along with updates about the impact of your work

We may also use your personal information to build a profile of your interests and preferences. This helps us send you only relevant and timely information. Building profiles helps us improve the experience our supporters have - if we understand their background we can make appropriate requests to those who may be willing and able to give more than they already do. This helps us raise funds sooner and more cost-effectively.

There is other information we can use, which is publicly available in places like public registers. This can include listed directorships, typical earnings in a geographical area, information from the electoral roll, press reports and social media posts.

Can I change my consent?

Yes! You can withdraw your consent, unsubscribe from or update your marketing preferences at any time. Just use the details in the 'Get in touch' section below.

If you make changes to your consent, we will update your record as soon as we possibly can. Emails will be stopped immediately, but it may take up to 60 days for our systems to update and stop post being sent to you.

If you tell us you don't want marketing, fundraising or campaign communications, you may still receive messages about transactions and services from other connections you have with us (as described below).

You can also opt out of receiving fundraising communications from us by signing up to the fundraising preference service (<https://www.fundraisingregulator.org.uk/the-fundraising-preference-service>).

When is it legal to use personal information?

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to Girlguiding. We process information on the basis of:

- Your consent (for example to send you direct marketing by email or SMS)
- Your contractual relationship with us (for example to provide you with goods or services that you have purchased from us)
- The necessity for compliance with a legal obligation (for example to process a gift aid declaration and carrying out due diligence on large donations)
- Girlguiding Gloucestershire's legitimate interests

What does 'legitimate interest' mean?

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so, and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Girlguiding Gloucestershire's legitimate interests include:

- Charity governance. This includes delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes.
- Administration and operational management. This includes answering enquires, giving information and services, research, events management, administration of volunteers and employment and recruitment requirements. This involves sharing information with local levels of Girlguiding Gloucestershire.
- Fundraising and campaigning. This includes administering campaigns and donations and sending direct marketing by post (and in some cases making marketing calls), sending thank you letters, analysis, targeting and segmentation to develop communication strategies and maintaining communication suppressions.

If you would like more information on our uses of legitimate interests or to change our use of your personal data please get in touch with us using the details in the 'Get in touch' section below.

If you are 14 or under

If you are under the age of 14, you must get permission from your parent or guardian before registering or giving us any information.

How long do you keep personal data for?

Girlguiding Gloucestershire keeps your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We decide how long is appropriate to keep personal data. We do this by considering the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the legal requirements.

If you ask to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you more unwanted messages.

Do you share my data with other organisations?

We do not share or sell your personal information to third-party organisations for marketing, fundraising or campaigning purposes.

We share your personal information with relevant local levels of Girlguiding Gloucestershire to:

- Administer your membership of Girlguiding
- Manage your participation in Girlguiding and Girlguiding Gloucestershire's activities
- Conduct market research so we can improve our offerings to you and as an organisation overall
- Conduct evaluations to improve the quality of our offering

We also share personal information:

- With data processors working on our behalf. For example, if you pay for a County event or training, we use a third party to process payments.
- Where we are required to by law, for example to law enforcement or regulatory bodies
- Where it is necessary to protect the vital interests of an individual
- If we have your consent

We may use third-party suppliers to manage events, campaigns or mailings for fundraising appeals; to carry out research surveys or for storage of your personal information on our behalf. You can find out more about the suppliers that we use by contacting us using the details in the 'Get in touch' section below.

How do you protect my personal information?

We use technical and organisational ways to protect your data and prevent the loss, misuse or alteration of your personal information.

Unfortunately, the transmission of data over the internet is not completely secure. Although we do our best to protect your personal data we can't guarantee the security of your data transmitted to our website. But once we receive your information we use strict procedures and security features to try to prevent unauthorised access.

We only use the personal information and bank details that we request to fulfil your order, process your event, activity or trip payment or process your donation.

We keep the personal information that is required for our accounts secure, and only for as long as required by law.

The information we collect from you may be transferred to and processed and/or stored at a destination outside the European Economic Area (EEA). If we send your personal data outside the EEA we will take reasonable steps to make sure the recipient uses appropriate measures to protect your information.

How do you use cookies and digital marketing?

Cookies are small text files placed on your computer by websites that you visit. They are widely used to make websites work more efficiently for visitors, and to provide information to the owners of the site.

We use cookies to:

- Remember certain information about users so they don't have to give the same information again
- Measure how people use our websites so we can improve the way information is provided
- Display adverts based on what parts of Girlguiding Gloucestershire's websites people have visited

You agree to our use of cookies by continuing to use our websites.

Remarketing

The Girlguiding Gloucestershire website may share your personal data with remarketing services - including Facebook, Google Adwords and Google Analytics - to serve our adverts to you on third party websites. Third-party vendors, including Facebook and Google, use cookies to serve ads based on someone's past visits to the Girlguiding Gloucestershire website.

Disclaimer

We cannot be responsible for any information you give in public community areas of the Girlguiding websites, or on websites that we link to from our platforms. This information can be viewed or collected by any third party - you should always be wary of publishing any personal information in public community areas.

You should also read the privacy notices of any other websites that we link to from Girlguiding Gloucestershire websites which you visit. This is so you may understand what information is collected from you and for what purpose.

Girlguiding Gloucestershire cannot be held responsible for the policies of any third party website that we link to, and you access these websites at your own risk.

What are my rights?

You have the following rights:

- **Right of access**

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member or volunteer you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access request and can be made using the details set out in the 'Get in touch' section below.

- **Right to be informed**

You have the right to be informed how your personal data will be used. This notice as well as any additional information or notice that is provided to you is intended to provide you with this information.

- **Right to withdraw consent**

Where we process your data on the basis of your consent (for example, to send you marketing texts or emails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Get in touch' section below.

- **Right to object**

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). You can do this, or discuss this right with us by contacting us using the details in the 'Get in touch' section below.

- **Right to restrict processing**

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

- **Right of erasure**

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

- **Right of rectification**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us using the details in the 'Get in touch' section below.

- **Right to data portability**

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

If you want to exercise any of the above rights get in touch at dataprotection@girlguiding.org.uk. We will consider each request in accordance with all applicable data protection laws and regulations.

Get in touch with us

If you have any concerns about the Girlguiding Gloucestershire's privacy notice or about how we deal with data, or how we've used your data, please get in touch. Write or e-mail to:

The Personal Information Lead
Girlguiding Gloucestershire
County Activity Centre and HQ
Deer Park
Cowley
GL53 9NJ
E-mail: personalinformation@girlguidingglos.org.uk

If your enquiry is about Girlguiding's membership system (GO) and how they deal with data, or use your data please contact Girlguiding's data protection team:

The Data Protection Officer
Girlguiding
17-19 Buckingham Palace Road
London
SW1W 0PT
Email: dataprotection@girlguiding.org.uk

You can also make a complaint to the information commissioner's office (www.ico.org.uk) and the fundraising regulator (www.fundraisingpreference.org.uk).

Changes to this privacy notice

Keep up to date with changes to this privacy notice by checking the website section from time to time.

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This privacy notice was last updated on 28 January 2019