

## PRIVACY POLICY

### Introduction

At West London Welcome we are committed to protecting your privacy and being transparent about what information we hold.

As part of our commitment, we strive to ensure the privacy of visitors to our website, as well as all others who play a part in our community (for example, the refugees, migrants and people seeking asylum whom we support, volunteers, donors, and other supporters of our charity).

If you are visiting our website, you can navigate the majority of it without giving us any personal information about you. In some circumstance we will need that additional information in order to provide you with the necessary support you may want to receive from us.

This privacy policy explains how we collect, process and store personal data about you, including:

- What information we may collect about you
- Why we collect it
- What we do with it
- When we may share it with others; and
- How you can access and update your information

By sending us a message through the website, completing our self-referral form/ or our referral form on behalf of someone else, making a donation, volunteering or using West London Welcome's services by any other means, you accept this privacy policy and authorise West London Welcome to collect, process and store your information as explained herein.

### Who we are

West London Welcome (collectively referred to as "we", "us" or "our" in this policy) is a charity registered in England and Wales (registration number 1183261) with its registered office at PO Box 78236, London, W14 4HQ.

We are the *controller* for the purpose of data protection legislation and responsible for your personal data.

### The information we gather

Personally identifiable information is information that personally identifies one individual from another or enables you to be individually contacted.

We collect and process different types of personal data which we have grouped as follows:

(1) if you are a **person we are supporting (refugees, migrants, and people seeking asylum who live in West London)**, this may include your full name, e-mail address and other contact information (telephone number or postal address), gender, date of birth, nationality, immigration status, first language, occupation, any health-related information we should be aware of, details of your immigration or asylum case, and any other information you share with us whilst engaging with us or through our website.

(2) if you are a **donor**, this may include your full name, e-mail address, donation history and gift aid details, financial information. You may always choose to donate anonymously.

(3) If you are a **volunteer**, this may include your full name, gender, contact details (e.g e-mail address or telephone numbers), your occupation and other information relevant to your application.

Like most websites, we also collect **Technical Data** to improve our website features and provide visitors with a better experience. This includes your domain name, the address of the last URL visited prior to clicking through the site, and your browser and operating system.

We sometimes collect **Special Categories of Personal Data** about you (this includes details about your ethnicity, religious beliefs, sexual orientation, information about your health, and information about criminal convictions and offences. This information is usually collected about refugees, migrants and asylum-seeking people living in West London who are supported by our community. We do not collect that data about donors or volunteers. We will only process that data where we have your explicit consent, unless otherwise we are authorised to do so under applicable data protection law.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate data to calculate the percentage of users accessing a specific website feature. We use this information to ensure that our website, e-mails and marketing efforts continue to appeal site visitors and supporters. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat that combined data as personal data and this will be used in accordance with this privacy policy.

## How Is your information collected

We use different methods to collect data from and about you:

- **Direct interactions.** You may give us information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - sign up to our newsletter on the website;
  - request a service from us by calling our helpline, sending a message through the website or by e-mail, or filling in our self-referral form;

- become a member or subscriber;
  - donate to our community (if you do not choose to donate anonymously);
  - apply for jobs or volunteer placements;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. [We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at <https://www.westlondonwelcome.com/cookie-policy> for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
    - analytics providers such as Google Analytics;
    - search information providers such as Google;
    - online social media pages such as Facebook, Twitter, LinkedIn, etc; and
    - referees who complete our *referral form* on your behalf.

### Members of the media, influencers, experts, other stakeholders

West London Welcome maintains lists of publicly available information regarding media contacts, journalists, social media influencers/users, subject matter experts and other stakeholders and individuals who make their personal and/or professional information and/or opinions publicly available. Since such information is made publicly available by you, we believe that its processing should have no negative impact on your privacy. The information may include names and handles, gender, job title, biographical, educational and work information, interests, work address, telephone number, public posting activity, profile picture, public conversations, engagement, followers and follower count.

We strive not to hold any Special Category of Data about such individuals unless those have clearly put such data into the public domain. Lists are accessed and used by West London Welcome for specific business purposes in conducting its own business and in conducting business on behalf of potential and existing clients. West London Welcome takes reasonable measures to limit the information processed to be relevant to legitimate business purposes and to minimize any risks to individuals associated with the use of such information.

Any individual may contact us to access, update and/or restrict use of such information consistent with applicable law by contacting us at [leyla@westlondonwelcome.com](mailto:leyla@westlondonwelcome.com).

### How we use your information

We will only use your personal data when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where it is **necessary for us to perform obligations which arise under any agreement** we are about to enter into or have entered into with you (e.g. to register or provide casework for refugees, migrants or people seeking asylum, provide you with casework support, to register volunteers, to register people who sign up to our newsletter, to process any donations made to us, or to send information to donors on how donations are being used).
- Where it is **necessary for the purposes of our legitimate interests** provided your interests and fundamental rights do not override those interests (e.g to further our legitimate charitable aims and grow our community, for administration and operational management, or to administer donations).
- Where it is **necessary for compliance with a legal obligation** (e.g to prevent fraud, to carry out due diligence on large donations).
- In a few circumstances, upon your **consent** (e.g if you engage in our activities and we want to display images and/or other materials containing personal information for campaigning purposes, if we want to send you marketing mailing communications).

We will never share or sell your personal data to a third-party organisation for that organisation's own campaigning, marketing or fundraising purposes.

### Storage and retention of your personal data

We store the personal information you provide in a secure database in order to provide you with the information, products and/or services you request, or with additional information about our services that we believe may be of interest to you.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of responding a request you submit to us, or satisfying any legal, regulatory, tax, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider 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 and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. In some circumstances you can ask us to delete your data: see 'your legal rights' below for further information.

### Disclosure of your personal data

West London Welcome may share your personal data with the following parties for the purposes set out in this policy:

- **Third party service providers** such as:
  - IT and system administration services, which assist us with the provision of the services (including website and database hosting);

- Payment processors that provide secure pages for transactions and donations; and
- Advertising suppliers that help us with the management of campaigns and fundraising appeals.
- **Safeguarding staff** in the NHS, national or local government when someone's welfare is at risk;
- **Staff from other NGOs** who are also supporting the refugee, migrant or person seeking asylum that West London Welcome are supporting;
- **Staff from local or national Government** who are involved in the immigration or asylum case of the refugee, migrant or person seeking asylum that West London Welcome are supporting;
- **Professional advisers** such as lawyers that may assist us with legal claims, casework or procedures involving refugees, migrants or people seeking asylum;
- **HMRC, regulators and other authorities** where we are required to do so by law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### International transfers

As some of our third party providers are based outside the UK, the processing of your personal data may involve a transfer overseas. Whenever West London Welcome transfers your personal data to outside the UK, we ensure a similar degree of protection is afforded to it by ensuring full compliance with all aspects of applicable data protection law.

### Data security

West London Welcome understands that the safety of your personal information is important to you. Accordingly, we use reasonable technological, physical and other measures to keep your information protected from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal information. In addition, we limit access to your personal information and so it will only be shared with our volunteers, staff, practitioners and service providers on a "need to know" basis. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Due to the nature of the internet and related technology, we cannot guarantee the security of your personal information and the company expressly disclaims any such obligation.

### Child protection

West London Welcome supports the need to protect the privacy of children. Although our site is not intended for use by individuals under 13 years of age and we do not knowingly collect personal information from children under that age, our services may require us to collect and process children data in some circumstances – for example, when we are registering the child; when we are acting in legal cases on behalf of children; or when we liaise with referrals regarding support for children (or their parents) living in West London.

Where possible and appropriate we will seek consent from a parent or guardian, if the child is under 13, or consent from the young person, if they are aged between 13 and 17 years old, before collecting information.

## Your legal rights

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

- **Request access** to the data we hold about you and details about how we use that data (commonly known as a “data subject access request”)
- **Request correction** of the data we hold about you (for example, if that personal data is incomplete or inaccurate)
- **Request us to remove** your data from our records (where you believe there is no good reason for us continuing to process it)
- **Object to the processing** of your personal data for marketing purposes
- **Request us to restrict** the processing of your data
- **Request a portable copy** of certain personal data where this is processed by automated means
- **Raise a concern or complaint** about the way your data is being used
- **Withdraw your consent** of use of your data at any time (where we are relying on consent as a lawful basis for processing your data)

If you wish to exercise any of the rights set out above, please contact us at [leyla@westlondonwelcome.com](mailto:leyla@westlondonwelcome.com). We will not discriminate against you for seeking any such rights.

No fees usually required: You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Time limit to respond: We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaint with ICO: You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). West London Welcome is registered with the ICO. We would, however,

appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to this privacy policy**

We may review this privacy policy from time to time and we will notify you of any changes by uploading a new version of this policy on our website. We will send you an e-mail or post an update notice on our website so that you become aware of any updates in this policy. You are advised to review this privacy policy periodically for any changes. Changes to this policy are effective when they are posted on our website.

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Contact us**

If you have any questions about this privacy policy, would like more information, or want to exercise your rights in relation to data protection, please contact us by e-mail at [leyla@westlondonwelcome.com](mailto:leyla@westlondonwelcome.com).