



After a long journey
comes friendship

REFUGEE & MIGRANT CENTRE

Privacy Policy

Last updated: April 2022

West London Welcome (WLW) is a community centre run for and with refugees, asylum seekers and migrants in West London. WLW is a space for people to socialise and share ideas, learn English, access a wide range of classes, activities and support and escape isolation and often chaotic accommodation.

This Privacy Policy applies to information WLW collects about all the individuals who interact with our organisation. It explains what personal information we collect and how we use it. WLW understands that the security of your personal information is vital and we are committed to protecting and respecting your privacy. We aim to be transparent about how we will use your data and to use it only in ways you would reasonably expect. We will only lawfully use the information that we collect about you.

This document sets out how we collect, use and store your personal information, as well as what we do to keep it secure. It also outlines your rights over any personal information we hold about you.

If you have any comments or questions about this notice, feel free to contact us at wondoncentre@gmail.com.

1. Personal data

The table below explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

| Purpose | Data (key elements) | Basis |
|-------------------------------------------------|----------------------|---------------------------------------------------------------------------------------------------------------|
| To enquire about our organisation and its work. | Name, email, message | Legitimate interest - it is necessary for us to read and store messages so that we can respond appropriately. |
| To subscribe to email updates about our work. | Name, email | Consent - active consent has been given. |
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|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To make a donation. | Name, email, address, payment information | Legitimate interest - this information is necessary for us to send you confirmation of receipt of your donation. |
| To sign up as personnel (volunteers, staff, practitioners). | Name, email, address, date of birth, experience, interest, DBS details, reference details | Legitimate interest - this information is necessary for us to process your application. |
| To use the centre as a client. | Name, email, address, date of birth, attendance, legal status and additional special or sensitive personal data | Legitimate interest - this information is necessary for us to fulfill our intention to help the guests. |
| Website functionality | Website activity collected through cookies | Legitimate interest - it is necessary for us to store a small amount of information, usually through cookies, to deliver sufficient functionality, such as remembering the contents of an order as it is processed. |

Volunteers: we may gather your information INDIRECTLY, when your information has been shared with us by a third party. For example, you may have been recommended to us as a volunteer, or by a friend or other charity. We may also contact a named referee for a reference.

Social media: depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

Individuals: we may gather your information INDIRECTLY, when your information has been shared with us by a third party. For example, if one of our associated charities recommends courses or support.

Children's data: we collect data from, and relating to, the children we are supporting. This will never be used for any other purpose and never without a parent's or guardian's consent.

2. Data security

Whatever your relationship with us, we ensure that there are appropriate technical controls in place to protect your personal details:

- our database is secure, protected and routinely monitored in order to keep your data safe;
- we undertake regular reviews of who has access to the information we hold;
- we ensure that your information can only be accessed by appropriately trained volunteers and contractors.

3. How we use your data

We will only use data in a manner that is appropriate to the basis on which that data was collected, as set out in the table at the start of this policy.

For example, we may use your personal information to:

- reply to your enquiries;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to it, to send you marketing communications by email relating to our work which we think may be of interest to you;
- help and support an individual and we need the information in order to do so.

4. When we share data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data-processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

5. How long we keep data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

6. Your rights over your data

You have a range of rights over your data, which include the following:

- where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this;
- you have the right to ask for rectification and/or deletion of your information;
- you have the right of access to your information;
- you have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that exercising some of these rights, such as the right to delete your data, will make it impossible for us to continue to deliver some services to you. However we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

If you have any queries regarding your data or would like to notify us that your contact details have changed, feel free to contact us at wldoncentre@gmail.com.

7. Cookies and usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, such as remembering your preferences, recording what you have put in your shopping basket and counting the number of people looking at a website.

Where we use cookies to collect personal data, we list these purposes in Section 1. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

8. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights we will notify those individuals affected whose personal data we hold.

If you have any questions regarding your Privacy Policy please contact us at hello@westlondonwelcome.com