

TOYNBEE  
HALL



## Toynee Hall Privacy Notice

September 2024

## VERSION CONTROL

### AMENDMENTS

Version	Author	Date	Comments
1.0	L Randall	September 2024	New statement

### REVIEWED BY

Name	Date	Next Review	Comments

## Table of Contents

Version Control .....	2
Amendments .....	2
Reviewed By .....	2
1. Introduction .....	4
2. Why we Collect your personal information.....	4
3. Lawful Basis Of Processing Information .....	4
4. What Information we collect and where from .....	5
4.1 Special Category Data .....	5
4.2 Third Party Collection of Personal Data .....	5
5. How Long we Keep Information For.....	6
6. Security of personal information .....	6
7. Children's information .....	6
8. Your individual rights .....	6
9. Consent.....	8
10. Failure To Provide Personal Information.....	8
11. Cookies .....	8
12. Automated Decision Making .....	8
13. Transfers To Third Parties .....	8
14. Transfers Outside Of The UK .....	8
15. Right to complaint .....	9
16. Additional information .....	9
17. Policy Review and Amendments.....	10

## 1. INTRODUCTION

We, Toynbee Hall (a registered charity) take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR-UK).

This privacy notice gives you information on how we collect and process your personal data through your use of this site and any data you may provide if you contact us regarding our products and services.

*We have appointed a data protection officer (DPO) who is responsible for monitoring and providing guidance with our GDPR status.* If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO/us using the contact information in section 15 of this privacy notice.

## 2. WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal data for one of the following purposes:

- To manage communications between you and us
- Where we need to perform the contract, we have entered into with you
- To provide you with information you have requested or which we may feel may be of interest to you
- To ensure the safe operation of our website and to monitor the performance of our website
- For marketing and advertising purposes
- For research and analysis purposes
- For providing advice services, community activities, research and policy, and venue hire to those in receipt of our services
- Preparing reports about our work, services, and events
- Carrying out fraud prevention and money laundering checks, undertaking credit risk activities and in relation to legal claims we take or defend
- Managing the page, set up to support your donations to us or any other accounts you hold with us
- Due diligence or ethical screening purposes
- To safeguard those who work for or with us or we otherwise engage with.
- To process and administer your job application or to volunteer.

## 3. LAWFUL BASIS OF PROCESSING INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

**The purpose test** – to identify the legitimate interest

**Necessity test** – to consider if the processing is necessary for the purpose identified

**Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

## 4. WHAT INFORMATION WE COLLECT AND WHERE FROM

- At Toynbee Hall, we collect personal information from you in various ways, such as when you register on our website, request information about our services, contact us, or use any of our programmes or services. The types of personal information we may collect, store, and use about you include:
  - Name, address, telephone number, email
  - Cookies, IP address
  - Your country of birth, nationality
  - Date of birth and gender
  - Financial information including any Benefits you receive, Bank Details, Debts
  - Profile information, feedback, and survey responses
  - Marketing and Communications information
  - Information about your organisation and its employees and stakeholders including, where applicable, directors, trustees, office addresses, email addresses, phone numbers and bank details
  - Aggregated information which includes statistical or demographic data, if and when we combine or connect aggregated information with your personal information, it can directly or indirectly identify you

### 4.1 SPECIAL CATEGORY DATA

We collect the following special category data from you:

- Health data
- Racial or ethnic original
- Case details and notes
- Religious or philosophical beliefs
- Sexual orientation
- Political opinions
- Trade union membership
- Genetic and biometric data

We will only process special category data, listed above, where we have a valid reason to do so under Article 9 exception (more information of what those exemptions are can be found [here](#)). We will use the most appropriate exemptions which in most cases will be explicit consent.

### 4.2 THIRD PARTY COLLECTION OF PERSONAL DATA

We may collect personal data about you from third parties, including but not limited to technical data from analytics providers (such as Google), payment and delivery service providers (such as Worldpay), and lifestyle or demographic insight data from third-party segmentation or marketing partners.

This data may be collected to help us improve our services, better understand your preferences, and enhance your experience with us. We ensure that any third parties we engage comply with data protection laws and have appropriate safeguards in place to protect your data.

Social media (for example, Facebook, Twitter and YouTube), we may receive information through your use depending on your settings or the privacy policy of these social media sites. Please refer to the privacy policies that these sites use for details of how to change your settings.

To build our understanding we may receive information from reputable public sources (for example, from newspapers, postings on LinkedIn or information held on Companies House), as well as information from third-party organisations we engage to help

us understand individuals' preferences and potential to provide us with donations and to run any due diligence checks on our funded partners.

Third Party Websites – when you use our websites or otherwise engage with us, you may receive links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

## 5. HOW LONG WE KEEP INFORMATION FOR

We pride ourselves on ensuring that your personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. All personal information collect has a defined retention period, which is in-line with our retention policy. If you would like to find out how long your information is being retained, please see "additional information", section 16 of this policy.

## 6. SECURITY OF PERSONAL INFORMATION

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see "additional information", section 16 of this policy.

## 7. CHILDREN'S INFORMATION

We will collect personal information and engage with you in accordance with this privacy notice (for example, if you participate in our programmes), however, please note, if you are under 18, you must have your parent or guardian's permission before you provide us with any personal information. If you are 14 or under, we will require a parent or guardian's email address before we engage with you and we will then contact such parent or guardian to verify that we may engage with you (and will typically then collect the parent or guardians' personal information and not that of the child)

Toynbee Hall provides services to children and will make reasonable efforts, taking into consideration available technology to verify consent is given by someone with parental responsibility over the child when the child is 16 years of age or younger.

## 8. YOUR INDIVIDUAL RIGHTS

In this Section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- Right to Object
- Right of Access
- Right to be informed

- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Data Portability

#### The right to object

You can exercise this right if

- Processing relies on legitimate interest
- Processing is for scientific or historical research
- Processing includes automated decision making and profiling
- Processing is for direct marketing purposes

#### The right of access

- You or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge.
- We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.

#### The right to be informed

- We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right.

#### The right of rectification

- If you believe the personal data we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made.

#### The right to erasure

- If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it.

#### The right to restrict processing

- You may ask us to restrict the processing of your personal data. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:
  - Processing is unlawful
  - We no longer need the personal data, but it is required for a legal process
  - You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
  - If you are exercising your right to rectification

#### The right to data portability

- You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
  - Processing is based on consent
  - Processing is by automated means (i.e. not paper based)
  - Processing is necessary for the fulfilment of a contractual obligation

If you have any question about these rights, please see "additional information", section 16 of this policy.

## 9. CONSENT

Where you have given consent for processing, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal. Please contact through the information provided in Section 15 of the notice.

## 10. FAILURE TO PROVIDE PERSONAL INFORMATION

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

## 11. COOKIES

Our website uses cookies. we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies. Please see our cookies policy for full details of the cookies used.

## 12. AUTOMATED DECISION MAKING

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

## 13. TRANSFERS TO THIRD PARTIES

Toynbee Hall may disclose your personal data, collected in section 4 to some third parties to help us deliver our services/products. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all of the following categories of recipients:

- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you
- Companies within our group where necessary for administrative purposes and to provide services to you
- Third parties that support us to provide products and services e.g. IT support, cloud-based software services, providers of telecommunications equipment, Ad Display Network)
- Marketing services providers
- Payment service providers
- Recruitment service providers
- Professional advisors e.g., lawyers, auditors
- HMRC / Other Regulators
- Government
- In case of a merger
- To enforce legal rights of individuals for the purposes of fraud protection and credit risk reduction.
- Web analytics and search engine provider to ensure the continued improvement and optimisation of our website, Google Analytics, Google Search Console, and Blog Vault.

## 14. TRANSFERS OUTSIDE OF THE UK

In this section, we provide information about the circumstances in which your personal data may be transferred to and stored in countries outside the United Kingdom (UK).



We may share personal information with third parties located outside the United Kingdom (UK). Any such transfers will be conducted in strict accordance with our instructions, and we will ensure that the highest standards of information security are applied to protect your personal data, as required by UK data protection laws.

Where personal data is transferred outside of the UK to a country that does not have an adequacy decision from the UK government, we will ensure that appropriate safeguards are in place before the transfer occurs. These safeguards may include:

Standard Contractual Clauses (SCCs) with a UK addendum: Legal agreements approved by the UK government to protect your data when it is transferred internationally.

International Data Transfer Agreement (IDTA): A legally binding agreement designed to ensure that your data receives adequate protection when transferred outside the UK.

Binding Corporate Rules (BCRs): Internal policies adopted by multinational companies to ensure that personal data is protected across their group, regardless of where it is processed.

An exception as defined in Article 49 of the UK GDPR: Specific circumstances where data may be transferred without the above safeguards, for example, with your explicit consent or to fulfil a contract with you.

For more information about how we safeguard your data during international transfers, or to obtain a copy of the relevant safeguards, please contact us using the information provided in section 16.

## 15. RIGHT TO COMPLAINT

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on [complaints@toynbeehall.org.uk](mailto:complaints@toynbeehall.org.uk)

Alternatively, you can contact us:

**By Post:** 28 Commercial St, London E1 6LS

**By Phone:** 020 7247 6943

Alternatively, you can make a complaint to the Information Commissioner's Office:

**By Post:** Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**By Website:** [Click Here](#)

**By Email:** [Click Here](#)

**By Phone:** 0303 123 1113 (Local rate) or 01625 545 745 (National rate)

## 16. ADDITIONAL INFORMATION

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this Privacy Notice or if you wish to receive more in-depth information about any topic within it, please contact us via email on [dpo@toynbeehall.org.uk](mailto:dpo@toynbeehall.org.uk).

## 17. POLICY REVIEW AND AMENDMENTS

We keep this Policy under regular review. This Policy was last updated on 01/09/2024.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.