

## **VLV Data Privacy Policy – May 2018**

This Policy sets out how VLV uses and protects your personal information, including data from your use of our website. This policy was updated in May 2018 to show that we are adhering to the new General Data Protection Regulation (GDPR), which came into force on 25<sup>th</sup> May 2018.

VLV is the Data Controller for personal data about supporters, event attendees and newsletter subscribers. For the purpose of this document we will use the group term 'supporters' to describe any one of these groups. Our ICO registration number is Z8185717.

We do not trade personal data for commercial purposes and will only disclose it if required by law, if it is necessary to arrange your event attendance, or if it is with your consent.

Use the [Contact](#) link for any data protection queries.

### **Your rights**

As an individual whose personal data is processed by VLV you have the following rights:

- [the right to be informed – which is what this privacy notice is for](#)
- [the right to access the data we hold about you](#) [the right to object to direct marketing](#) – either use the 'unsubscribe' button on our emails or contact us directly
- [the right to object to processing carried out on the basis of legitimate interests](#)
- [the right to erasure \(in some circumstances\)](#)
- [the right of data portability](#)
- [the right to have your data rectified if its inaccurate](#)
- [the right to have your data restricted or blocked from processing](#)

To exercise any of these rights, please use the [Contact](#) link to get in touch.

If you are not happy with the way we have handled your data, and are unable to resolve the issue with us personally, you can complain to the [ICO](#).

## **Read more about the data we process and store**

### **Email subscribers**

If you subscribe to our mailing list, you will be automatically subscribed to receive email updates.

Depending on your preferences, we will contact you for the following reasons:

- Policy updates
- Notification of events
- Membership renewal

- VLV campaigns
- Fundraising
- Volunteering opportunities

We use Mailchimp to manage our email marketing. Mailchimp store their data in the US but they comply with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework. They do share data with third parties. You can check Mailchimp's privacy policy [here](#).

We transfer all contacts to our own database which is UK hosted. This system is kept updated with your preferences.

You can change your email preferences at any time, by emailing 'unsubscribe' or 'manage preferences' in response to any of our emails or by contacting: [info@vlv.org.uk](mailto:info@vlv.org.uk).

## **Survey responders**

If you take part in a survey run by VLV you will use an online service called Survey Monkey.

[See Survey Monkey's privacy policy.](#)

If you would prefer to submit responses to these surveys in another format, please contact [info@vlv.org.uk](mailto:info@vlv.org.uk).

We will only re-contact you following a survey if you have expressed consent.

## **Members, donors, volunteers and fundraisers**

We collect some data when you register with VLV. This data includes the following:

- Name, title/s and full postal address
- Bank, credit card and payment details
- Contact details such as email addresses, social media links and telephone numbers
- Your date of birth
- Information relating to events you may organise such as the event date, the donation collection method, records of the money raised
- How you heard about us
- What kind of connection you have with our charity
- Why you have decided to donate to us - we will never make this question mandatory, and fully understand if you are not comfortable telling us

- Your feedback from our services or dealings with us

How much of this information we collect depends on the type of relationship you have with VLV and the information we build in the course of your relationship with us.

**We will use your information to:**

- Provide you with the services or information you have asked for
- Administer your contact details and give you the opportunity to change your preferences as well as amend errors and update your data
- Manage donations (including processing Gift Aid)
- Support your fundraising activities
- Help with your activities online
- Keep a record of your relationship with us (including your feedback)
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information
- Screen and analyse our supporters against a demographic database for the purpose of segmentation, so that we can efficiently and cost-effectively fundraise, and ensure the most suitable level of marketing is carried out across our entire supporter base
- Flag your data record– for example if you request to be removed from certain mailing lists, opt out of any specific data processing, or if you have special requirements
- Conduct surveys so that we can be sure our services are maintained to a high standard

We may also use your personal information to detect and reduce fraud and credit risk, or for due diligence purposes.

We need to keep the details of financial transactions for 7 years after the financial year of a donor's last gift, in the event of a tax or banking enquiry. If you make a donation we will only contact you to thank you. By making a donation or becoming a member of VLV you will be added to our email subscriber list and will receive regular updates and information about VLV activity unless you request to opt out of these.

**If you contact us**

If you get in touch with us via email or telephone or post we may save the details you share with us on our database. This way, if you get in touch with us in future we can refer to our

previous conversations. We will not contact you or share your details without asking for your consent.

## **Lawful basis for processing personal data**

VLV processes data on the basis of legitimate interest. Those on our mailing lists include:

- VLV members who pay an annual subscription to support VLV
- Those who have supported VLV financially or in other ways in the past
- Those who have attended VLV events
- Members of the press/news media organisations who want to hear about our views and events
- Members of Parliament
- Those who work in broadcasting, broadcasting regulation, broadcasting policy with whom we have had contact in a professional context and have a relevant relationship with VLV.
- Those who work in academic institutions who specialise in broadcasting policy

All individuals on VLV's database benefit from the information VLV shares free of charge in its communications. They have a reasonable expectation that we will process their data in order to be able to communicate with them. It is in the interest of those whose data is on VLV's database to be informed about VLV events and campaigns; they have demonstrated their interest by engaging with VLV in the past and would expect to be informed about broadcasting policy and events by VLV.

There is no impact on the privacy of the individuals' whose data we hold and by processing this data VLV will not override the privacy rights of individuals.

Personal data gathered from publicly available sources will always be screened against a suppression file of those who have opted-out of the VLV's communications in the past.

When contacting individuals for the first time using publicly available data to do so, VLV will ensure the individual is provided with a privacy notice at the first point of contact, to make them aware that their data has been processed under legitimate interest, and give them a clear opportunity to object to further processing.

## **Website visitors**

We use Google Analytics (GA) to track site user interaction. We have GA code installed on our site which creates one or more text files on your computer (called a "cookie"). The cookies contain an ID number which is used to uniquely identify your browser and track each site you visit that has GA enabled.

We use this data to determine the number of people using our site and to better understand how they find and use our web pages. With this information we can continually improve the information that we provide on our site and the processes for actions such as contacting us and donating. We can also use it to increase the number of new people

finding our site.

Google analytics stores the following data:

- Time of visit, pages visited, and time spent on each page of the webpages
- Interactions with site-specific widgets
- Referring site details (such as the URL a user came through to arrive at this site)
- Type of web browser
- Type of operating system (OS)
- Flash version, JavaScript support, screen resolution, and screen colour processing ability
- Network location and IP address
- Document downloads
- Clicks on links leading to external websites
- Errors when users fill out forms
- Clicks on videos
- Scroll depth

Google also collects information about you from its Doubleclick tracking and profiling service, from ad-supported apps on your Android or iOS device, from your YouTube and Gmail activity and from your Google account. This data is put together and used to make inferences about your age, gender, interests, hobbies, shopping habits and living circumstances.

### **Your rights**

If you already have GA cookies, they will be updated with the latest information about your visit to the site.

As we cannot access any personal data about you ourselves, we are not the Data Controller for your Google Analytics or Doubleclick profile data. You would need to contact Google directly for this information.

You have the right to object to this tracking and to stop it happening.

### **How do I prevent being tracked by Google Analytics?**

If you are uncomfortable with this tracking, you can take the following actions:

- Use a tracking-blocker, such as [Privacy Badger](#)
- Clear cookies after every browsing session
- Install the [Google Analytics opt-out extension](#)

## **Social Media platforms**

You may come across VLV naturally on Facebook or Twitter or other social media platforms through your own networks, or you may be presented with an advert from us. We do this to inform, educate and engage new potential supporters.

Social media platforms are a hugely valuable tool for us and for the community that we serve, which is why we use them. These platforms, however, are commercial companies. We want to remind our users that information shared on timelines, on our page or in private messages may be used or sold by these companies for commercial purposes.

## **Event attendees**

When you attend a VLV event, we will need your name, email address and in some cases your payment information. We will use this information solely for the purpose of administering the event. This data will not be kept for longer than 3 years. After this period we will archive this data.

If you are a speaker at a VLV event, we will publically promote your involvement via social media platforms, on our website and with emails to our supporters. This data may continue to be processed by those platform providers after the event has ended.

## **Employees and job applicants**

If you apply to work at VLV, we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside VLV - for example, if we need a reference, or need to get a 'disclosure' from the Criminal Records Bureau - we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we will hold your personal information for 12 months after we've finished recruiting the post you applied for. After this date we will destroy or delete your information. We keep de-personalised statistical information about applicants to develop our recruitment processes, but this does not contain any information that could be used to identify individual job applicants.

If you begin employment with us, we will put together a file about your employment. We keep the information in this file secure, and will only use it for matters that apply directly to your employment.

Once you stop working for us, we will keep this file according to our record retention guidelines. You can contact us to find out more about this.