

# **Screen Share UK Privacy Notice**

## 1. Introduction

This Privacy Notice is written by Screen Share UK (referred to as "we" throughout this document). We are a registered charity registered in England and Wales (Charity number 1205408). Screen Share UK is a charity whose mission is to advocate, support and inform the digital inclusion of refugees in the UK.

Screen Share UK takes privacy and data handling incredibly seriously. This Privacy Notice sets out how we collect and process personal information in our capacity as controller.

This document is prepared for everyone who comes into contact with Screen Share UK - our volunteers, referral partners, service users, donors (of technology and otherwise) and those who entrust us with their data for the purposes of digital marketing - and explains when and why we collect personal data, how we use it, the conditions under which we may disclose it to others, and how we keep it secure. Please read it carefully and contact us if you have any questions or concerns by emailing info@screen-share.co.uk.

## 2. How do we collect personal information from you?

We obtain personal information from you when you contact us directly through our website, on social media, through our donation or referral forms, when making a financial donation to Screen Share UK, donating your tech to Screen Share UK, or otherwise provide us with personal information.

We also use cookies on our website. The cookies we use are of an essential nature and are limited to those initially placed on our website by our website provider, the details of which you can view <a href="here">here</a>. We recommend consulting <a href="this resource">this resource</a> to understand more about these cookies why these cookies are considered essential. You can manage our use of cookies on our website by accepting the 'Accept' or 'Decline All' buttons on the cookies banner, or by accessing your cookie settings in relation to each cookie type by selecting 'Settings' on the cookies banner. You may also view your browser cookies settings for <a href="Firefox, Internet Explorer">Firefox, Internet Explorer</a>, <a href="Google Chrome">Google Chrome</a>, <a href="Safari (IOS X)</a>, <a href="Safari (IOS)">Safari (IOS)</a> and <a href="Android.">Android.</a>

We may also receive information about you from third parties; for example, from another organisation referring you to our services or from a mutual contact who wants to introduce you to us.

# 3. What type of personal information do we collect and process?

**Technology Donor:** The personal data we collect from you (including via the form that we require you to submit) as a donor of technology, such as a laptop or a tablet, may include your name, address (if you would like us to collect a laptop from you), email address, and phone number. We may also collect information about the specification of your donation – including its make and model – in order to assess its suitability for our donation recipients. We do not intentionally or knowingly collect sensitive personal data (or "special category data" as it is referred to in the relevant data protection legislation) from donors.



We require you to wipe your device of all data prior to donating it to us, and as a result we do not intentionally receive or process any personal data stored on any donated device. Please visit our Technology Donation Guidance for more information.

**Volunteer:** The personal data we collect from you as a volunteer may include your CV, employment history, disclosure and barring service checks, contact details or home address. People who are interested in volunteering with us are invited to complete an <u>enquiry form</u>. The form asks for personal information including your name, contact details, age and geographical location. We use the information to assess the suitability (such as skill set and geographical location) of potential volunteers for a mentoring role. In respect of unsuccessful candidates, your information will be kept for no more than three years after the date of submission and will be used only within Screen Share UK. Your information will not be shared externally except as required by law or regulation (unless, for example, to arrange a collection or drop-off a donation, in which case we may share your contact details or location with your consent).

**Financial Supporter** The personal data we collect from you as a supporter may include your email address, social media handles and phone number. Your bank details will be collected and processed by the third-party platforms we use (eg. Paypal, JustGiving, GoFundMe).

**Referral Partner:** The data we may collect from you may include your name, email address, phone number and job title, and the name, location, and contact details of your organisation.

**Service User:** By referring an individual or household to our services (including via the form that we require you to submit), you will share with us your referee's name, postal address, telephone number, email address, age, nationality, skills and employment/education status, immigration status, gender, job title and living circumstances. When you share this information, we ask you to confirm you have collected necessary consents from referees and referred them to this Privacy Notice. If you self-refer and request technology or training from us (including via the form that we require you to submit), we may collect the same categories of personal data.

At every stage of our interactions with you, we only ask for information that is relevant to give you the help you need.

### 4. How do we use your personal data and what lawful basis do we rely on to do so?

We will only use your personal data when we have a lawful basis to do so and only to the extent necessary in order to fulfil the purpose for which we need to collect it. Below we set out these purposes and the lawful bases we rely on in order to do so.



Type of data subject:	How we use your personal data:	The type of personal data we use:	The lawful basis we rely on:
Individual who represents referral partner organisation (e.g. staff of refugee charities)	To contact you so we can arrange for the delivery of the device so you can pass it to the recipient; so we can discuss the partnership	Name, email address, phone number.	Performance of our contract with you
Individual who represents referral partner organisation (e.g. staff of refugee charities)	To report to our donors and followers about the demographics of their past or prospective support	Name, email address, phone number	Our legitimate interests to carry out our business with you
Service user (when referred by partner organisation, by non-partner organisation or by another individual)	To deliver our services to you when you have been referred to us by a partner organisation or by an organisation with whom we are not partnered; so we can arrange for delivery of our services; so we can ask you about the impact of the device	Via initial form: Name, postal address, telephone number, email address, age, nationality, skills and employment/education status, immigration status, gender, job title and living circumstances.  Additional data categories via impact form: How you have used the device and photographic evidence.	All data categories (except nationality and immigration status): Performance of our contract with you  Nationality and immigration status: Explicit consent.
Individual who represents non-partner organisation which is referring another individual to use our services, or individual who is referring another individual to use our services (e.g. in the capacity of friend or family)	To contact you so we can arrange for the delivery of the device so you can pass it to the recipient; so we can discuss the delivery of the device	Name, email address, phone number	Performance of our contract with you
Service user/recipient (when self-referring)	To deliver our services to you having self-referred	Via initial <u>form</u> : Name, postal address, telephone number, email address, age, nationality, skills and	All data categories (except nationality and immigration status): Performance of our contract with you



		employment/education status, immigration status, gender, job title and living circumstances.  Additional data categories via impact form: How you have used the device and photographic evidence.	Nationality and immigration status: Explicit consent
Volunteers	To create a record in our database for you if you register to stay in contact with us; to add you to our Slack; to call you to discuss volunteering projects you are working on; to email you about projects you might want to get involved with; to invite you to team meetings etc; to arrange drop off and pick up of tech to your house; to send you promotional material; For business as usual purposes and the administration of our provision of technology and/or training	Name, date of birth, phone number, address, 'are there any other geographical areas you are based in/visit regularly'; occupation; 'are you disclosure and barring service checked'; name of referee	Performance of our contract with you  Compliance with legal obligations which we are subject to
Donors of technology (individuals)	To assess whether we have an interest in your donation; to arrange for delivery of donated technology to us	Name, address (when collecting a laptop), email address, and phone number  We will also receive any data which you have retained on your device	Performance of our contract or taking steps prior to entering into a contract with you
Financial donors	To arrange to receive your financial donation	Name, email, donation amount	Performance of our contract with you
Relevant individuals who submit complaints, requests or engage in suspicious activities	For complaint handling, data subject requests, suspicious activity reporting and any other sensitive matters dealt with by our legal and compliance team (including for the establishment, exercise or defence of legal claims)	Name, email address, phone number	Compliance with legal obligations which we are subject to



Mailing list / newsletter subscribers (via Mailchimp); individuals who have requested bespoke emails	To keep you updated with our work and impact (including future fundraising campaigns); so we can tell you about new programmes and opportunities; and so we can invite you to join programmes as and when we launch them; to invite you to get involved with screen share as an individual or to partner with us as an organisation	Name, email address, phone number	Consent  We will only send you marketing information by email, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in to receive marketing information again, then we will follow your most recent preference expressed to us
Referrers for prospective volunteers and employees	To help us conduct due diligence on our volunteers and employees prior to our engagement of them	Name, occupation/job title, how long have you known the applicant, reasons for the recommendation	Our legitimate interests to carry out our business
Prospective volunteers and employees	To manage the engagement process, assess and confirm a candidate's suitability for engagement, including, conducting due diligence on volunteers and employees	Name, occupation/job title, telephone number, town/city of residence	Our legitimate interests to carry out our business

Where Screen Share relies on your consent to process your personal data, you have the right to withdraw your consent at any time by emailing us at info@screen-share.co.uk.

# 5. How long do we keep your personal information?

We will only retain your personal data while it is necessary for the purposes we collected it for. Typically, this means we will delete your personal data: (i) once it is clear that we won't use it to contact you about the availability of or updates on our services; or (ii) after three years has passed since we last processed your personal data for the purpose we collected it, whichever is sooner.

We may need to keep your personal data for longer than this where it is necessary (i) to establish, bring or defend legal proceedings or to comply with a legal or regulatory requirement; or (ii) to preserve records to be able to deal with external or internal audits.

# 6. Who do we share your personal information with?

Your personal data may be disclosed by us to the following third parties:



- third parties which assist us with providing our services to you (set out below);
- other service providers including IT suppliers, administration services providers (set out below);
- public bodies, including regulatory bodies, where we are obliged or permitted by law to do so (this may include the Information Commissioner's Office); and
- our professional advisers including lawyers and auditors.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We work with the following third-party processors to provide our technology and services:

- (i) **MailChimp:** Our mailing list is managed by Mailchimp who process and store the personal data you have provided.
- (ii) **Google Suite:** We use the Google Suite of products generally for file storage and management of our organisational documentation. We do all back office administrative work here including receiving requests for support, organising donations and managing queries.
- (iii) **Wix.com:** We use Wix.com as our domain provider.
- (iv) **Ascend by Wix:** If you use our 'Send a message' chat box on our website, we ask for your name and contact details and use this information to respond to your enquiry.

#### **Financial Donation Third Parties:**

When you donate to Screen Share UK by direct bank transfer, cheque or cash, we collect your personal information to process your donation, claim gift aid (where applicable) and to thank you. When you donate to us through our website, your data will be processed by other companies on our behalf. Those companies will share your personal information (such as name, financial information and contact details) with us. These companies are:

- (i) **GoFundMe:** an online portal and service for individual donors and people organising fundraising events for us.
- (ii) **DonorBox**: an online portal and service used by third sector organisations in the UK, Europe and the US. based in the UK.

We compile reports of all donations received. If you choose to donate anonymously, we will only know the date and amount of your donation. If you have donated through our website, we may receive a donation identification number which would enable GoFundMe or DonorBox to answer any particular questions we have about your donation.



If you donate to us by direct bank transfer, we may ask if your donation is eligible for Gift Aid and collect your contact details. If you give permission for us to get in touch with you when you donate through our website, we will share our full Privacy Notice with you when we thank you for your donation. At this stage, we also give you the opportunity to sign up for our email newsletter and/or to receive bespoke emails. We will only use the information you give us at the point of your donation to contact you again (for example about events and further opportunities to support our work) if you give us your consent. You can choose to stop hearing from us at any point by contacting us.

## 7. When might we carry out an international transfer of your personal data?

Your personal data will in limited circumstances be transferred outside the UK (e.g. when we use the third party processors set out above). We will only share personal data with others outside the UK when we have appropriate safeguards in place, namely where:

- (i) the UK government has decided that the relevant country has adequate protective rules in relation to data protection in place (an "adequacy decision");
- (ii) we have entered into the relevant "standard contractual clauses", international data transfer agreement (IDTA) and international data transfer addendum (UK Addendum) (as appropriate) with the recipient of your personal data (these contain obligations in relation to how your personal data is protected and used); or
- (iii) we can rely on another basis under the law such as that we have to share the personal data because this is necessary for the purpose of a court case, investigation or to protect our legal rights.

For further information please contact us.

### 8. Data security

Screen Share UK adopts appropriate physical, technical and organisational measures to keep your personal information secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage. We are committed to ensuring that all reasonable and appropriate steps have been taken to protect your personal data which includes, where appropriate:

- Keeping the amount of personal information we have about you to a minimum, by only asking for information that is relevant to your reasons for contacting us and erasing it when we no longer have a valid lawful basis for keeping it;
- Limiting who can access your information to as few team members as possible;
- Ensuring that all of our electronic storage is secured and encrypted where possible;
- Keeping hard copy information to a minimum and disposing of it securely when necessary; and
- Training all staff to understand and work in line with our commitment to protecting your data,



including asking them to sign a volunteer agreement which adheres to this Privacy Notice.

# 9. Your rights under data protection law

In accordance with the UK GDPR, you have a number of rights under data protection law with regard to the personal data we use about you. These are described in the sections below.

**Right of access to personal data -** You have a right to request a copy of the personal data we hold about you.

**Right to rectification** - If you believe the personal data we hold about you is incorrect, you can contact us to request for any incomplete or inaccurate data that we hold about you to be corrected. However, we may need to verify the accuracy of the new information you provide to us.

**Right to erasure** - You have the right to request the deletion or removal of personal data we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to us holding your information, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with law. Although we will consider every request for erasure on its merits, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at that time of your request.

**Right to object to processing** - You have a right to object to the processing of your personal data where we are using it for the purpose of our legitimate interests. If we agree that your objection is justified we will stop using your information for those purposes. Alternatively, we will explain why we still need to use your information.

**Right to restrict processing of your personal data -** You have a right to request us to suspend the processing of your personal data in the following situations:

- for the period it takes us to rectify any inaccurate data about you;
- where our use of the data is unlawful but you do not want us to erase it;
- where you want to prevent us from deleting your data at the end of the retention period in the event that you need it to establish, exercise or defend a legal claim;
- where you have objected to our use of your data, but we need to verify whether we (or a third party) have overriding legitimate grounds to use it.

**Right to request the transfer of your personal data to you or to a third party** – You have the right to ask us to transfer certain information we hold about you to a third party you have chosen, or directly to you. Where your request is valid, we will provide you with your personal data in a structured, commonly used, machine-readable format.



If you do not want to receive communications from us about our work, events, surveys, and other information which we think you might be interested in, you can unsubscribe or unfollow on each of the communications themselves, with or without giving a reason. Alternatively, please send an email to info@screen-share.co.uk.

If you would like to exercise any of your rights under data protection law, if you change email address or any of the other information we hold is inaccurate or out of date, please email us at info@screen-share.co.uk.

## 10. Right to lodge a complaint

If you have any complaints about how we handle your personal data, please contact us by email at info@screen-share.co.uk and we will do our best to assist.

You also have a right to make a complaint to the supervisory authority in your country of residence or employment or place of the alleged infringement. The Information Commissioner's Office ("ICO") is the UK supervisory authority for data protection issues.

You can contact the ICO:

by Telephone: 0303 123 1113 or 01625 545 745

or in writing to: Information Commissioner's Office (ICO)

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

or via their website: https://ico.org.uk/

## 11. Updates to this Privacy Notice

We may change the terms of this Privacy Notice from time to time. If we do so, we will post the changes here so please check from time to time. If you have given us your email address, we will inform you by email of any material changes.

This Privacy Notice was last updated in *June 2024*.