

# **Autism Unlimited Privacy Notice**

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client, customer, employee or volunteer and the choices you give us about what information you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Autism Unlimited exists to support and empower those living with autism. We recognise the challenges for children, adults and their families and will work with them as partners to find solutions and create opportunities through tailored learning and support.

By standing side by side with autistic individuals we provide learning, life advice and practical skills that are as individual as they are. From bespoke education for children to independent living skills for adults we ensure that everyone who comes to us for support finds a route to their goals and to a rich and fulfilled life.

#### What we do

Our help is varied and far reaching.

#### Education

Portfield School, a non-maintained special school based in Christchurch, Dorset, was founded in 1971 by parents of children with autism. Managed by Autism Unlimited, the school supports children and young people with autism and associated difficulties aged 3-19.

Futures Unlimited aims to help autistic young people aged 19-25 make choices and develop the skills they need to move successfully and happily into adulthood.

## Information & Support

Community Connection - we provide a sign posting service on a range of autism related topics to help autistic people, families and professionals to access services and plan for the future.

## **Adult Support**

Our Community Support and Residential Services offer a range of personalised social care services for people with autism and associated difficulties.

Our services are available to anyone who needs it - people with autism and associated difficulties, families and professionals. Anyone affected by autism can rely on us for support.

Autism Unlimited is registered with the Charity Commission in England & Wales (Charity Number 1000792) and with Companies house (Registered Company Number 2506982)

Please read this notice carefully, along with any other documents referred to in this notice, to understand how we collect, use and store your personal information.

If you have any questions regarding our Privacy notice, please write to: The

Data Protection Officer
Autism Unlimited
Charity Hub
Portfield School
Parley Lane

Christchurch Dorset BH236BP

Call us on 01202 483360 or send an email for the attention of The Data Protection Officer: <a href="mailto:enquiries@autism-unlimited.org">enquiries@autism-unlimited.org</a>.

### **Data Protection**

Autism Unlimited takes data protection very seriously.

As you browse our website, get in touch with us, or use our services we collect information. This deepens our understanding of what you are interested in and helps us to improve the efficiency of our services and fundraising communications.

Autism Unlimited will never exchange or sell your information to another organisation for their own marketing purposes. We know that this is important to you, and want to reassure you that you are always in control of how we use your personal information in regards to marketing and fundraising activities.

We do however need to collect and use your personal information for carefully considered and legitimate business purposes, which help ensure we can run Autism Unlimited efficiently, raise funds effectively and deliver our charitable services. This notice sets out how your personal data will be used, what data we collect, our legal basis for its use, along with outlining your rights in respect of personal data.

#### **Purposes**

In simple terms, your personal information may be used to help us effectively deliver our charitable services and/or to help us raise funds for those charitable services.

We always strive to provide a clear, honest and transparent approach regarding how and when we may collect and use your personal data. The overview below summarises the different reasons why we do this. We may not use your personal information for all of these purposes – it will depend on the nature of our relationship with you, and how you interact with our services, websites, and fundraising activities.

## **Examples of common activities**

### 1. Delivery of services

Delivery of our core services will require the recording of contact details, their eligibility for our charitable services, records of financial transactions, and communications. We may also use your personal information to promote our other services. We may also need to use your personal information for the prevention of fraud, to identify any misuse of our services, or for debt recovery.

### 2. Fundraising and Marketing

Like all major charities, we have a range of fundraising and marketing activities that are designed to raise income or promote the aims and objectives of the charity. We use a range of marketing activities and channels such as direct marketing and face-to-face activity, advertising (including but not exclusive to print, broadcast and digital) and public relations for marketing, fundraising, and income generation. This may include talking to you about appeals, competitions, commercial trading activities, sponsorships, events or volunteering opportunities. We may also ask if you are able to Gift Aid any of your donations.

### 3. Management of Volunteers

If you are one of our fantastic volunteers, we need to use your personal information to manage your volunteering activity, deliver training, involve and update you on our projects and campaigns and to ensure

your safety. This may include sending you newsletters or information about our fundraising activities so you can advise the public about our work

### 4. Analysis, Targeting, and segmentation

In order to fund our vital work, we have to communicate our aims and objectives and ask people for financial support. Efficiency is very important to us, as we value every single donation. Therefore, we only want to send communications that are genuinely interesting and relevant to you. We will make use of information you have given us, your interactions with our services, and some publicly available information to help us predict your interests, tailor and personalise our communications. This may be used for event planning, and to allow us to tailor our communications geographically. This activity does not identify individual supporters but can be useful for deciding what postcodes receive which messages to ensure they are relevant to you.

### 5. Wealth screening & financial profiling

We do not undertake routine wealth screening or financial profiling of our supporters. We only undertake this activity with the explicit consent of the supporter. There are times when donors in a position to give a very large gift want Autism Unlimited to undertake research on the types of major projects they are interested in supporting. Where it is appropriate, we will ask for consent to carry out more detailed research.

#### 6. Staff administration

Our teams are made up of a variety of positions. In order to fund and deliver our services we employ a range of professional, technical, and support staff. We process the personal information of our employees for recruitment, staff administration, remuneration, pensions, and performance management purposes.

### 7. External Training

We gather email addresses, phone numbers and addresses. This is all stored on pipedrive within our CRM system.

## **Lawful Processing**

Autism Unlimited needs a lawful basis to collect and use your personal data. The law allows for six legitimate ways to process people's personal data. Only three of these are relevant to charities for the types of purposes listed above.

- Information is processed on the basis of a person's consent
- Information is processed on the basis of a contractual relationship
- Information is processed on the basis of the "legitimate Interests" of Autism Unlimited

In extreme situations, we may share your personal details with the emergency services if our employees believe it is in your 'vital interests' to do so. For example, this would apply when someone is taken ill at one of our services. We may also share your personal information where we are compelled by law to do so.

### Consent

Autism Unlimited will ask for your consent to send you marketing and fundraising emails, and text messages. We will also ask for your explicit consent if we wish to undertake detailed wealth screening such as financial profiling, which relies on third party data sources. If you register as an Autism Unlimited volunteer it can be very helpful if you share information on any medical conditions that may affect your ability to perform your voluntary role. This is, of course, voluntary and we will ask for your consent. You can withdraw consent for these channels and activities at any time by contacting our Fundraising Team.

### What are Autism Unlimited's Legitimate Interests?

The law allows personal data to be legally collected and used if it is necessary for a legitimate business interest of the organisation - as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned.

There are times when it is just not practical to ask a person for consent. In many situations, the best approach for Autism Unlimited and our supporters, clients, and volunteers is to process personal data because of our legitimate interests, rather than consent. If you want to change our use of your personal data for marketing and fundraising activities, you can do so at any time by contacting our friendly supporter services team.

#### Governance

- Delivery of our charitable purpose as listed on the Charity Commission.
- Intergroup transfers between Autism Unlimited services.
- Reporting criminal acts and compliance with law enforcement agencies
- Internal and external audit for financial or regulatory compliance purposes
- Statutory reporting

## **Publicity & Income Generation**

- Unsolicited commercial or non-commercial messages, including campaigns, income generation or charitable fundraising
- Conventional direct marketing and other forms of marketing, publicity or advertisement
- Personalisation used to tailor and enhance the customer experience in our digital and postal communications
- Exercise of the right to freedom of expression or information, including in the media and
- the arts
- Analysis, targeting, and segmentation to develop corporate strategy and improve communication efficiency
- Processing for research purposes (including marketing research)

## **Operational Management**

- Employee and volunteer recording and monitoring for recruitment, safety, performance management or workforce planning purposes
- Provision and administration of staff benefits such as pensions
- Physical security, IT and network security
- Maintenance of "Do not contact lists" (suppression lists)
- Processing for historical, scientific or statistical purposes

### Financial Management & Control

- Processing of financial transactions and maintaining financial controls
- Prevention of fraud, misuse of services, or money laundering
- Enforcement of legal claims including debt collection via out-of-court procedures
- Administration of supporters' estates and/or gifts in Wills where Autism Unlimited has been named as beneficiary or executor.

### **Purely Administrative Purposes**

- Responding to any solicited enquiry from any of our stakeholders
- Communications designed to administer existing services for a service user under our care.

- Administration of Gift Aid
- Delivery of requested products or information packs
- Thank you communications and receipts
- Administration of existing financial transactions

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

### **Data Collected**

We collect and use personal information such as name and address details along with other contact information such as email addresses and telephone numbers. We also collect information about the services you may use, any purchases or financial transactions you make, or any marketing contact preferences you give. We maintain a record of communications we send to you, conversations we may have either on the phone or in person and we will log any communications that you send to us. We may also ask for other information like date of birth, your interests, connections to autism and reasons for your support.

If you have kindly Gift Aided your donation to Autism Unlimited, we must record the fact that you are a UK taxpayer, and we have to maintain a record of the amount of Gift Aid we have claimed.

### Do we process 'sensitive' personal information?

Under data protection law, certain categories of personal information are recognised as sensitive, including health information, race, religious beliefs, and political opinions

('sensitive personal data'). In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities, enable you to participate in an athletic event (such as a marathon), or to help you volunteer. We may also be legally required to collect sensitive personal data in connection with the provision of our service to you.

### Your credit or debit card information

If you use your credit or debit card to donate to us, or buy something online, we pass your card details securely to our payment-processing partner as part of the payment process. We do this in accordance with the Payment Card Industry Security Standard and don't store the details on our website or databases.

## Where does the information come from?

The vast majority of personal data we hold is given to us directly by you as a supporter, customer, service user or volunteer in the course of you interacting with our services, websites, or fundraising activities. We may also receive your personal information when you donate through third party services such as, but not exclusively; Just Giving, Virgin Money Giving, or BT Donate.

We may occasionally use external lead generation organisations to provide us with the contact details of people who have expressed an interest in Autism Unlimited and have agreed to receive communications from Autism Unlimited.

In some situations, we may update our supporters, clients and volunteers personal information using other agencies; for example, to check we have a valid and deliverable postal address, or to check if you are on the telephone preference service or fundraising preference service.

### **Data Retention**

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. However, we will retain documents (including electronic documents) containing personal data to the extent that we are required to do so by law, if we believe that the documents may be relevant to any ongoing or prospective legal proceedings or in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk). If a supporter has kindly left Autism Unlimited a gift in their will we will maintain our records of that pledge indefinitely to carry out legacy administration and communicate effectively with the families of people leaving us a legacy.

### **Data Sharing**

Autism Unlimited or any of its services will not exchange or sell your personal information to another organisation for their own marketing purposes. However, there are legitimate situations where we may have to share your personal information with other organisations. An example could where we are using an external service provided via a technical supplier, email broadcaster, event organiser or mailing services provider. In these situations, the relationship between Autism Unlimited and the third party data processor will be governed by a contract and strict security requirements will be in place to protect your personal information.

## **Data Protection Rights**

Where Autism Unlimited is using your personal information on the basis of your consent, you have the right to withdraw that consent at any time. You also have the right to ask Autism Unlimited to stop using your personal information for direct marketing purposes. Simply contact our friendly Fundraising Team and they will amend your contact preferences.

Right to be informed – You have the right to be told how your personal information will be used. This notice document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

Right of Access – You can write to the Data Protection Officer asking what information we hold on you and to request a copy of that information. We have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

Right of Erasure – You have the right to be forgotten (i.e. to have your personally identifiable data deleted). In many cases we would recommend that we suppress you from future communications, rather than data deletion.

Right of Rectification – If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

Right to Restrict Processing – In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right to Data Portability – Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another.

Right to Object - You have an absolute right to stop the processing of your personal data for direct marketing purposes.

Right to object to automated decisions – In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions "that have a legal effect on you", you have the right to

object. Autism Unlimited does not undertake complex computerised decision making that produce legal effects.

### **Marketing Preferences**

We only want to send you communications that are genuinely interesting, appropriate, and relevant to you. You are in control of how we use your personal information for marketing and fundraising purposes. Simply contact our friendly Fundraising Team and they can update your preferred communication channels, or give you control of the types of fundraising communications you receive. Visit our website for more details https://www.autism-unlimited.org.

## Facebook Marketing

We may participate in Facebook's 'Custom Audience' program, which enables us to display adverts to our existing supporters when they visit Facebook. We may provide your email address, mobile number and address to Facebook, so they can determine whether you are a registered account holder with them. Our adverts may then appear when you access Facebook. Your data is sent in an encrypted format that is deleted by Facebook if it does not match with a Facebook account.

### For more information please see

https://www.facebook.com/business/help/744354708981227 and Facebook's Data Policy at https://en-gb.facebook.com/policy.php.

### Our website

Through our website may collect, store and use the following kinds of personal information:

- information about your computer and about your visits to and use of this website;
- information that you provide to us for the purpose of registering with us;
- information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters.

## Third party websites

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

## Collection of Data through 'Cookies'

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: http://www.google.com/privacypolicy.html.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third-party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

Cookie	Name	Purpose
Session cookie	SESS<>	When required, cookies beginning with 'SESS' are used to track an individual's persistent status, such as whether they are logged in.
Google analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
JavaScript	has_js	We use this cookie to track which browsers are capable of processing JavaScript. JavaScript is a scripting language which provides enhanced interactivity and visual effects.
Cookie acceptance	cookied- agreed-en	This cookie is used to record if a user has accepted the use of cookies on this website.

Autism Unlimited uses resident cookies to store data on the hard disk of your computer for the purpose of identifying you when you return to the Autism Unlimited website.

Autism Unlimited may use click through and open mail tracking when sending emails. This process gives Autism Unlimited the ability to tailor future email communications.

By using our website, our social media pages (such as Facebook, Twitter, YouTube, Google+ and Instagram), subscribing to our services, donating to us and/or shopping online, you agree that, unless you have set your computer's browser to reject them, we can place cookies on your device and use that data in accordance with this notice.

### Notification of changes to this privacy notice

This Privacy Notice may change from time-to-time. For example, we will continue to update it to reflect new legal requirements. Please visit this website page to keep up-to-date with the changes to our Privacy Notice.

## What to do if you are not happy?

In the first instance, please talk to us directly so we can help resolve any problem or query. Our friendly supporter services team can help, or you can contact our data protection officer using this email address enquiries@autism-unlimited.org

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at www.fundraisingpreference.org.uk or by calling 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line 0303 123 1113 or at www.ico.org.uk