The Upper Room

Privacy Notice

About this notice

The Upper Room helps hundreds of vulnerable people every year to make them more resilient and to help them make positive life choices.

As part of our work, we collect and process personal data about the people who interact with us. This includes:

- visitors to our website
- individuals we work with (our "beneficiaries") and provide services for
- supporters and donors
- volunteers
- staff
- individuals who make enquiries or raise complaints
- individuals who sign on to join our events and/or fundraise for The Upper Room.

The kind of data we collect depends on how people use our services, which would include getting employment advice and support, meals, driving courses, supporting our campaigns, making donations, or volunteering.

We only collect the bare minimum we need to offer our services and do our work. We are completely committed to protecting your data and privacy, and pride ourselves on taking great care to ensure it stays completely safe.

We promise we'll never share or sell your personal data to a third-party organisation for marketing, fundraising or campaigning purposes.

This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

We regularly check this notice to make sure we're giving you with the most up-to-date information available about how we're processing our data. We recommend you re-read this page from time to time to make sure you're happy with any changes that might be made.

If you have any questions about this notice, please contact us using the details in the 'Contact us' section below.

1 Why we collect your data

We collect the minimum of data required to provide our services and do our work. We're completely committed to protecting your data and privacy, and we pride ourselves on taking great care to ensure it stays completely safe.

Some of the reasons we might collect your data include:

- to provide you with advice, support or services that you have requested or been referred to;
- to record personal details shared during conversations with staff;
- to process personal details required for the administration of your driving course;
- to record and contact you regarding payments you make to The Upper Room;
- to administer services The Upper Room is providing to you;
- to communicate with you regarding our work, fundraising, and campaigning activities;
- to process donations and administer Gift Aid information for any donation you make to us;
- to provide you with information about and to administer events;
- to administer and send you information about our legacy programme;
- for our own internal administrative purposes, and to keep a record of your relationship with us;
- to manage your communication preferences;
- to process job applications or volunteer placements;
- to address and resolve complaints about our services;
- to comply with applicable laws and regulations, and requests from statutory agencies;
- to comply with our contractual obligations to our funders.

2 Using your personal data

If you are receiving advice or support from us, or if someone else has referred you to us for such a service, we will need to process your data because of your specific relationship with us.

We will keep all your relevant personal information – including notes, letters, emails and information given to us about you – in a confidential record that is specific to you. We use an electronic customer relationship management system (CRM) as well as paper records to support our advice, guidance and support provision. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your case(s). This ensures that we provide appropriate and accurate advice or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or for one of the other purposes discussed in this notice.

We may need to disclose and discuss your personal information to third party individuals or organisations if this is necessary to help resolve your issue.

Examples include:

- your landlord; council housing, social services and Housing Benefits teams:
- the DWP/Job Centre or HMRC:
- your GP or medical professionals;
- lenders and creditors; legal representatives or advisers;
- the court.

We will discuss this with you as we go along, and will only act with your express consent unless one of the other legal bases in data protection legislation applies.

Where our funders require it as a condition of our contract with them, we may use your data in reports to them. Typically this is so that they can monitor the outcomes of the help we have provided to you, to ensure we are meeting the terms of our contract with them.

We may use your data for general statistical reports. These statistics will not include any information that could be used to identify any individual.

3 Information we collect

Depending on how you use our services, the types of information we collect from you might include:

- your full name and date of birth;
- contact details – including your postal address, telephone number(s), and email address;
- National Insurance number;
- details of your case when providing you with specific advice or services;
- your bank details;
- records of your correspondence and engagement with us;
- donation history and Gift Aid details;
- photographs, video or audio recordings;
- occupation; biographical information;
- other information you share with us which may include your criminal record.

This information may be collected via:

- any paper forms you complete;
- telephone, webchat or email conversations, or face-to-face interactions;
- digital forms completed via our website;
- third-party companies and websites such as Just Giving;
- publicly available sources;
- communication via social media.

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. Where we are providing you with advice or support services, we may record your sensitive personal data if this is necessary for the establishment, exercise or defence of legal claims, or if it is in the substantial public interest because we would not be able to provide our services without doing so. Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

Cookies and automatically collected information

If you visit our website or social media pages we may automatically collect the following information:

- which pages you visit
- your IP address
- the amount of time you spend on our website

- whether you are a new visitor
- how you came to our website
- geographical location
- the type of device and browser you use.

This information is collected through the use of "cookies" and we will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. More information on cookies can be found in our cookie declaration (https://theupperroom.org.uk/privacy/cookie-declaration/). Blocking or deleting cookies will have a negative impact on the usability of our website.

4 Fundraising/campaigning/direct marketing

We would love to keep you up to date with our fundraising, marketing and campaign activity.

We use a range of marketing activities and channels to contact our supporters – including our website, face-to-face fundraising, direct mail, SMS/text campaigns, email, and telephone.

We will obtain your consent to contact you by email and text message for marketing purposes.

We will never share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the 'Contact us' section below.

Any electronic communications, such as emails, will have a link to unsubscribe from future electronic communications, so you can manage your own communication preferences.

If you make any changes to your consent, we will update your record without undue delay and at the latest within one month of receipt. You can also opt out of receiving marketing communications from us by signing up to the Fundraising Preference Service.

5 Administrative communications to supporters

In addition to the fundraising and marketing communications that you receive from The Upper Room, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters. For example, we will call you after you have set up a Direct Debit to confirm your details, and upon cancellation. There may also be other occasions where we need to contact you about your donation – for example, if there is a problem with a payment or in relation to your gift aid declaration.

As mentioned above, we may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

6 Security of your personal data

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data.

7 Retention of your data

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc.

Subject to the above, we will typically store data relating to donors and people who have taken campaign actions for seven years after their last donation or interaction, and people to whom we provide services to for seven years after completion of those services. Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted, or anonymised.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

8 Your rights

You have many rights under data protection legislation. These include:

Right of Access

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to once calendar month. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by:

1. emailing dataprotection@theupperroom.org.uk
2. writing to the Data Protection Manager, c/o The Upper Room, St Saviour Wendell Park Church, Cobbold Road, London W12 9LN

Right to be informed

You have the right to be informed how your personal data will be used. This notice, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

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 of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

9 Contact us

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out above, you can get in touch with us in the following ways:

1. uradmin@theupperroom.org.uk
2. 020 8740 5688
3. The Upper Room, St. Saviour Wendell Park Church, Cobbold Road, London W12 9LN