

Privacy Policy

Introduction

At Tiny Steps, we take your privacy seriously and are committed to protecting your personal information and being clear about what we do with it. Your ongoing support is invaluable to us in our mission to set up a sensory play centre to help children with additional needs.

The General Data Protection Regulations ("GDPR") came into force on 25th May 2018 to control the use of personal information or data. Under GDPR, personal data is any information which can directly or indirectly identify a living person.

We treat your personal information with respect – whether you're a supporter, donor, fundraiser or volunteer – and set out how we operate in compliance with GDPR. This policy covers:

- Who we are
- What personal data we collect on you
- How we collect your data
- What we do with your data
- Why we process your data and the lawful basis for processing
- Where we store your data and how we protect it
- Who we share your data with
- What is our marketing policy
- How we use your data on our website
- Your rights

Who we are

Tiny Steps is a non-profit making registered charity and are reliant on our volunteers and your donations to help us realise our aim of providing a sensory play area and social café for children and young people with additional needs and their families in the Northwich / Winsford area of Cheshire.

As part of handling and processing your data, we have a designated Data Controller who will be the contact if you have any queries or issues about what we do or why we do it.

Our Data Controller is: Tiny Steps (Charity number: 116/1146)

Contact details:

Tiny Steps, 221 Hartford Road, Davenham, Northwich, CW9 8JP
info@tiny-steps.co.uk

This policy is reviewed regularly and was last updated on 19th July 2018

What personal data we collect on you

We will collect the minimum personal information we need to interact with you, which may include the following:

- Identity data e.g. full name, gender, age / date of birth
- Contact data e.g. addresses, phone numbers, email addresses
- Information for market analysis
- Record of your contact with us whether a query, compliment or complaint
- Any other information you provide to us

Certain types of information are in a special category under data protection laws as they are considered to be more sensitive. Examples of this type of sensitive data would be health information, race, religious beliefs, political opinions or sexuality / biometric information.

We only collect this type of information from our supporters to the extent that there is a clear reason to do so. For example, when we are undertaking research to support the need for the sensory play centre and you have chosen to tell us about your experiences or to take part in surveys. Wherever we can, we will make it clear to you why we are collecting this type of information.

How we collect your data

When you directly give us information

We mainly collect data from you when you interact directly with us, this can be when you:

- get in touch directly using the contact details on our website (typically phone, email, letter)
- from meeting you in person and exchanging contact details to enable us to provide you with more information
- support our work through a donation
- fundraise on our behalf
- attend an event after buying a ticket from us
- tell us your story
- participate in a survey

When you indirectly give us information

When you interact with us on social media platforms such as Twitter, Facebook and LinkedIn, we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and their privacy policies.

When you give permission to other parties to share it with us

Your information might be shared with us by independent event organisers or fundraising sites like Just Giving. These independent third parties will only do so when you have indicated that you wish to support Tiny Steps and only with your consent. You should check their privacy policy when you provide your information to understand how they will process it.

We also obtain information from publicly available channels and our network of contacts when we are looking for local businesses and professionals to support or us or assist in our business case.

If you're 16 or under

If you're aged 16 or under, you must get your parent / guardian's permission before you provide any personal information to us.

What we do with your data

We use your personal data for the following purposes:

Donation processing: we will process personal information you provide in order to administer donations and claim Gift Aid. When you donate to Tiny Steps using the donate page on our website your donation is processed through PayPal. We may follow your donation with a thank you email generated through PayPal but we do not have a copy of your contact details.

Respond to a request: if you contact us with a query, we may use your personal information to provide you with a response. When you send us a query using the contact details on our website, we will not add you to a mailing list and will only provide the information requested.

Fundraising: we use our events and fundraising initiatives to raise further funds and increase awareness of Tiny Steps and our aims.

Market research and surveys: you may participate in surveys and market research to help us improve our fundraising and support our case to set up a sensory play centre. Participation is voluntary and no individuals will be identified as a result of this research, unless you consent to us publishing your feedback. If you have provided information to us to support the case for a sensory centre either directly or through a survey, we will anonymise the data in any report we provide to third parties.

Managing our events: we may need additional information from you, such as dietary requirements, if you attend one of our events. We do not keep a record of this information.

Administration: we may process your personal information to maintain our internal records and fulfil our legal reporting obligations such as completing our accounting and tax records.

Why do we process your data and the lawful basis for processing

We process data for fundraising, to raise awareness of Tiny Steps and put together a supporting case and plan for a sensory play centre.

GDPR provides six lawful bases for processing data. We mainly process your data on the basis of Legitimate Interests. This is where we use your personal information if it is reasonably necessary for us to do so and in our “legitimate interests” provided that the information is fair and does not duly impact on your rights. You have the option to opt-out of receiving any further information from us by advising us at any time. We will include an option for you to opt-out at the end of our emails.

If you have shared your experiences with us either directly or through a survey, we will ensure that you cannot be identified unless you consent to us using your information. We will make it clear to you how we will use your information and the reason for doing so. You have the right to withdraw your consent at any time.

Where we store your data and how we protect it

We protect your personal information by:

- Only keeping it for as long as strictly necessary
- Only passing it to carefully selected third parties
- Anonymising your personal details when using data from market analysis to support our objective
- Maintaining secure, password protected electronic devices that are backed up on a regular basis
- Keeping limited paper documents which are held in a secure place
- Securely destroying personal data at the end of the retention period

Online donations are processed for Tiny Steps by Paypal who follow payment card industry (“PCI”) security compliance guidelines when processing card payments. We do not store or have access to credit or debit card details when making a payment online. If you need further details on how they protect your information please review their privacy policy available online at <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>.

However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security if any data disclosed or transmitted over public networks.

We only keep your data for as long as is necessary to complete our obligations. We may need to keep records for tax or accounting purposes for up to seven years after a transaction.

Who we share your data with

We only share your data with carefully selected third party partners, where necessary, in order to help us to raise further funds, maintain our records and achieve our objective of setting up the sensory play centre. We never use your data for sales purposes. Any sensitive information will be anonymised.

What is our marketing policy

We provide information about Tiny Steps and our events on our website and social media platforms. We do not send out marketing newsletters and only provide information in direct response to queries.

When you send us a query, we do not add you to a database or mailing list. On our emails we will provide you with an option to opt out of receiving any further communications.

How we use your data on our website

In order to provide you with the most tailored experience of our site, we will need to place small text files, or “cookies” on your computer. Most cookies that we use are session cookies and only exist for the length of time that you are using our site. They perform certain functional tasks – such as remembering that you are logged in when moving from page to page or to pre-load personal data from forms to save you time.

The use of cookies does not give us access to the rest of your computer or to personal information about you. You can set your browser to reject all cookies. Please note that if you do this then certain areas of the

website will not be able to function for you. Choose a browser setting that rejects third party cookies but allows the benign, functional ones and site will work.

External links

We occasionally include links to third party sites to provide you with news and relevant information that may be of interest to you.

External links to any site other than our own are not our responsibility and we cannot control how any other business handles your data. We provide a direct link to Paypal to process donations and to our social media platforms.

Transferring data outside of the UK or European Economic Area (“EEA”)

We do not transfer data outside of the UK or EEA. However, by the nature of the internet, the personal data you supply through this website may be sent electronically to servers anywhere in the world e.g. Google Analytics. It may be used, stored and processed anywhere in the world including countries outside the UK or EEA

Your Rights

You have the right to be informed of what we do with your data and why. Under GDPR you have following rights:

- To access, edit and update your personal information
- To be forgotten and have your personal information deleted
- To restrict processing of your personal information
- To object and complain

You can find more about your individual rights on the ICO website

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you have any issues or queries or need further information, please contact our Data Controller by:

1. Writing to us at:
Tiny Steps, 221 Hartford Road, Davenham, Northwich, CW9 8JP
2. Emailing us at: info@tiny-steps.co.uk

Right to access, edit or update your personal information

You have a right to request a copy of the information we hold on you. Please contact us if you wish to receive a copy of any of your personal data. We will provide a copy of all data we hold on you within one month.

We endeavour to keep all our data as accurate and up to date as possible. If any data, we hold on you is inaccurate or out of date please contact us and we will rectify as soon as possible and at the latest within a month.

All requests should be addressed to our Data Controller at: info@tiny-steps.co.uk

Right to be forgotten

If a member of the public asks for their personal data to be removed from our current record systems, this will be done within one month of the request being received. The same timescale will apply when we are notified that personal information needs to be corrected or updated. You can also opt out of email correspond

You also have the right to be forgotten by us. If you want to be forgotten by us, please contact us at and info@tiny-steps.co.uk advise us that you want to be forgotten by us.

We will remove all data we hold on you other than what is required to complete our Contractual Obligations. However, you should be aware that by being forgotten, should you may a new enquiry or details are passed to us in future, we will neither hold or have access to any data about you. We also need to store some data, in a secure place, to ensure that we remember your request to be forgotten. For example, if we need to restore systems from a backup we need to know and to remember that you wanted to be forgotten.

Right to restrict processing

You can withdraw consent for any aspect of data processing at any time. Please be aware that we must process and maintain data to support contractual obligations to you and to third parties so withdrawing your consent will not necessarily mean that your data is deleted. We will retain what is necessary to fulfil our contractual obligations and also an identifier to ensure we do not collect your data again.

You can opt out of receiving any communication from us, other than mandated by our contractual obligations, by sending an email to info@tiny-steps.co.uk

Right to object or complain

You have the right to lodge a complaint with the ICO if you feel that we have not lived up to our obligations.

<https://ico.org.uk/for-the-public/raising-concerns/>