



Baby Necessities Southampton

Privacy Notice

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1 IMPORTANT NOTICE

This is the privacy notice of **Baby Necessities Southampton**, a registered charity with the Charity Commission (no.1193806) at Unit C1, The Premier Centre, Premier Way, Romsey, Hampshire SO51 9DG (“**Baby Necessities**”, “**we**”, “**us**” or “**our**”).

We take your privacy very seriously, and this notice sets out how we collect and process your personal data.

Baby Necessities is a charity dedicated to the alleviation of poverty in families with children through the provision of essential equipment and services.

This Privacy Notice relates to personal information that identifies “**you**” meaning volunteers or potential volunteers/ users of our services/ service user referral partners/ suppliers/ individuals who browse our website/ individuals outside our organisation with whom we interact. If you are an employee, contractor or otherwise engaged in work for us or applying to work for us, a separate privacy notice applies to you instead.

This Privacy Notice may vary from time to time so please check it regularly. This version of this Privacy Notice was first published on 12/10/2023 and has not been updated since.

2 HOW TO CONTACT US

Controller

This Privacy Notice applies where we are a controller in respect of your personal data – this is where we decide how and why your personal data is processed.

If you wish to correct your personal data held by us or to opt out at any time from receiving marketing correspondence from us or to alter your marketing preferences, please contact the Funding and Communications Manager at info@baby necessities.co.uk

If you need to contact us in connection with our use or processing of your personal data, or to gain access to it, then our contact details are info@baby necessities.co.uk or call 01794 765240.

CATEGORIES OF PERSONAL DATA WE COLLECT

The categories of personal data about you that we may collect, use, store, share and transfer are:

- **Individual Data.** This includes personal data which relates to your or (in the case of the users of our services) your child's identity, such as first name, middle name, last name, marital status, title, date of birth and gender and contact details such as your address, email address and telephone numbers;
- **Advertising Data.** This includes personal data which relates to your advertising preferences (e.g. when receiving fundraising or volunteering information from the charity), such as information about your preferences in receiving marketing materials from us and our third parties and your communication preferences;
- **Account Data.** This includes personal data which relates to your past interactions with the charity, such as donations made by you, your interests, preferences, feedback and survey responses, or charity services received by you;
- **Audio and Visual Data.** This includes personal data which is gathered using our CCTV or other recording systems in the form of images, video footage and sound recordings that is taken at any of our locations or otherwise by us for promotional purposes;
- **Health Data.** This includes personal data which is gathered for health and safety purposes including any accident report or claim log or any information you provide about allergies or other medical conditions during the booking process for any of our events or in one of our locations, or as necessary for the performance of our services to our services users (e.g. in respect of new mothers); and
- **Charity Research Data.** This includes personal data which is gathered for the purposes of research into the charitable sector, or how best to improve or extend the perform the charity's aims. This may include demographic data of our service users such as age and location (however please see "Aggregated Data" below).

We may also create Personal Data about you, for example, if you contact us by telephone to share your feedback then we may make a written record of key details of the conversation so that we can take steps to address the feedback.

Aggregated Data

We also obtain and use certain aggregated data such as statistical or demographic data for any purpose ("**Aggregated Data**"). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate our service users' data in order to understand how our services are being used, and where we may best improve our reach. However, if we re-combine or re-connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Special Category Personal Data

In addition, we may obtain certain special categories of your data / sensitive personal data, and this Privacy Notice specifically sets out how we may process these types of personal data. The

special categories of data are: (i) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; and (ii) the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We do not collect any information about criminal convictions and offences.

Children's Personal Data

We collect and store information about the children and young people who we help through our services (whether it is provided by their parents, guardians or healthcare providers/referrers), which includes the individual data set out above.

3 THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

- **Directly from you**, either in person (at our locations or otherwise), via our website or social media or by telephone. This could include personal data which you provide when you:
 - (a) Donate to the charity or volunteer/ apply for volunteering opportunities;
 - (b) subscribe to our newsletter or other publications;
 - (c) Request information on our services or for other fundraising marketing to be sent to you;
 - (d) enter into a competition or promotion;
 - (e) complete a survey from us or give us feedback;
 - (f) apply for or receive our services, whether through a referral or through direct application; or
 - (g) enquire with us about current equipment/ clothing donation requirements at the charity.
- **Via automated technologies**, such as CCTV or other recording systems, cookies, server logs and other similar technologies. We may automatically collect Information Technology Data about your equipment, browsing actions and patterns by using cookies, server logs and other similar technologies.
- **From someone else**, such as:
 - (a) our service user referral partners (e.g. healthcare providers or community leaders);
 - (b) our provider of online bookings;
 - (c) providers of technical, payment and delivery services (such as Stripe and Paypal); and
 - (d) providers of social media platforms (such as Facebook and Instagram) for example where you share, like or follow our content through social media.
- **From publicly available sources**, such as:
 - (a) Companies House; and

- (b) the electoral roll.

4 HOW WE USE YOUR PERSONAL DATA

We collect personal data about you in order to:

- perform our contractual obligations to you. This would include processing and performing any services we provide and orders placed by you or processing your donations.
- manage our relationship with you including:
 - a. to send you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Notice);
 - b. to provide you with important real-time information about products or services you have ordered from us (e.g. a change of time or location due to unforeseen circumstances);
 - c. to send you information you have requested;
 - d. to deal with your enquiries; and
 - e. to ask you to leave a review or feedback on us;
- administer the charity and carry out our activities;
- make suggestions and recommendations to you about services that may be of interest to you, deliver relevant website content to you and to measure or understand the effectiveness of our advertising;
- communicate with you about, and administer your participation in, special events, programs, promotions, any prize draws or competitions;
- for internal purposes to use data analytics, to identify usage trends, determine and measure the effectiveness of promotional campaigns and advertising and to improve our website, products/services, marketing, service user or supporter relationships and experiences;
- protect our charity including to deal with any misuse of our website and to comply with our security policies at our locations;
- use your personal data to comply with our own legal obligations e.g. to comply with health and safety requirements, or to assist in a police investigation;
- enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties;
- to detect and prevent fraud and other illegal activities (and to assist regulators, trade bodies and law enforcement agencies in relation to the same);

- finance, restructure or otherwise dispose of our charity in whole or in part including to any potential buyer or their advisers;
- use our knowledge of any health-related personal data you disclose to us in the event of illness or injury or some other related emergency or to record any accident or injury or other incident you may suffer when visiting any of our locations; and
- investigate and defend any third-party claims or allegations.

5 OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA

Where we may rely on consent

For certain purposes it may be appropriate for us to obtain your prior consent. The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.

In the event that we rely on your consent, you may at any time withdraw the specific consent you give to our processing your personal data. Please contact us using the contact details set out in section 2 ‘Contact Details.’

Please note even if you withdraw consent for us to use your personal data for a particular purpose we may continue to rely on other lawful bases to process your personal data for other purposes.

Examples of when we may rely on your consent to process your personal data include:

- where, in the provision of our services to you, we need to use your sensitive / special category personal data relating to your health;
- where we would like to use photos or images taken of you in promotional materials;
- where we or our carefully selected third parties have new products and services which we think you will be interested in.

Other legal bases we may rely on

Where we are relying on a basis other than your consent, the lawful basis for processing personal data will be one of the following:

- the processing is necessary in order for us to comply with our **legal obligations** (such as compliance with anti-money laundering legislation);
- the processing is necessary for the **performance of a contract** you are party to or in order to take steps at your request prior to you entering into a contract;
- processing is necessary for the establishment, exercise or defence of **legal claims**; or
- the processing is necessary for the pursuit of our **legitimate charitable interests**. In particular, our legitimate interests include:

- a. the performance of our charity's aims and purpose;
- b. the recovery of debt;
- c. the security of our IT network;
- d. the prevention of fraud;
- e. marketing of our services and promotion of our charity
- f. the reorganisation or refinancing of the charity;
- g. the study in how to develop and the update of our products and services;
- h. the development of our charitable strategy;
- i. protecting our charity and property; or
- j. the processing is necessary in order to protect the **vital interests** of an individual e.g. where there is a medical emergency at one of our premises.

Extra conditions for sensitive personal data

Where we are processing your sensitive / special category personal data one of the following conditions will also apply:

- you have given your **explicit consent** to the processing;
- the processing relates to personal data which are **manifestly made public** by you;
- the processing is necessary for the **establishment, exercise or defence of legal claims**;
- the processing is necessary for **archiving** purposes in the public interest; **scientific or historical research purposes or statistical purposes**;
- the processing is necessary to protect an individual's **vital interests** where the individual cannot give consent;
- the processing is necessary for reasons of **substantial public interest**;
- processing by a **not-for-profit body** in certain circumstances;
- processing is necessary for reasons of **public interest in the area of public health**.

6 WHO RECEIVES YOUR PERSONAL DATA

We may disclose your personal data to:

- our affiliates or third party data processors who may process data on our behalf to enable us to carry out our usual charitable practices. Any such disclosure will only

be so that we can process your personal data for the purposes set out in this Privacy Notice;

- HMRC, legal and other regulators or authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;
- external professional advisers such as accountants, bankers, insurers, auditors and lawyers;
- law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- third parties which are considering or have decided to acquire some or all of our assets, merge with us or to whom we may transfer our charity (including in the event of a reorganisation or liquidation); and/or
- third parties operating plugins or content (such as Facebook, Twitter, Instagram) on our website which you choose to interact with.

7 PERSONAL DATA ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US

If you provide personal data to us about someone else (such as a service user you are referring to us) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice.

You must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, the way in which we collect and use personal data and our personal data disclosure practices, that individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided.

8 ACCURACY OF YOUR PERSONAL INFORMATION

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the website or by contacting us. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

9 HOW LONG WE WILL STORE YOUR PERSONAL DATA FOR

We will store your personal data for the time period which is appropriate in accordance with the following criteria:

- the on-going charitable operation / relationship that we have with you;
- the completion of the purpose for which the personal data was given;
- our legal obligations in relation to that personal data and other legal requirements;
- the type and size of the data held and whether any if it is deemed to be special category personal data; or
- our accounting requirements in relation to that personal data.

We keep the length of time that we hold your personal data for under review. These reviews take place annually.

10 **CONTRACTUAL OR STATUTORY REQUIREMENTS ON YOU TO PROVIDE PERSONAL DATA**

In certain circumstances the provision of personal data by you is a requirement to comply with the law or a contract, or necessary to enter into a contract.

It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to provide our services to you, e.g. where we rely on the personal data you provide in order to do so.

11 **YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA**

Subject to applicable law including relevant data protection laws, in addition to your ability to withdraw any consent you have given to our processing your personal data (see paragraph 5), you may have a number of rights in connection with the processing of your personal data, including:

- the right to request access to your personal data that we process or control;
- the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- the right to request, on legitimate grounds as specified in law:
- erasure of your personal data that we process or control;
- restriction of processing of your personal data that we process or control;
- the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- the right to lodge complaints regarding the processing of your personal data with the Information Commissioner's Office. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in section 2 'Contact Details.'

12 TECHNICAL AND SECURITY MEASURES

We take the security your personal data seriously and have technical and organisational measures to ensure a level of security appropriate to the risk.

We use a mixture of measures including utilising technology to combat cybersecurity breaches, data management techniques, user access and management procedures, physical security and guidelines for personnel.

13 LINKS TO OTHER WEBSITES

This policy only applies to us. If you link to another website from our website, you should remember to read and understand that website's privacy policy as well. We do not control unconnected third-party websites and are not responsible for any use of your personal data that is made by unconnected third party websites.