



transformation

DRAFT PRIVACY POLICY

Policy reviewed by	Chief Executive
Date reviewed	11 March 2025
Trustees Committee	Finance & Charity
Approval/Oversight	Approval
Next review date	11 March 2026



Transformation is a data controller registered with the UK Information Commissioner's Office under registration number **ZA049820**.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data. We have policies, procedures, and training in place to help our team understand their data protection responsibilities and follow the principles of data protection.

We have a nominated member of staff who serves as our Data Protection Officer is Anna Corbett, Chief Executive Officer who may be contacted via anna@transformationcpr.org If you have any questions regarding our Privacy Policy, please email admin@transformationcpr.org

This privacy policy relates to personal information that Transformation collects and uses.

This includes:

- How and when we collect personal information
- The personal information that we collect
- Our legal basis for processing personal information
- Why we collect personal information
- Sharing personal information
- Cookies and aggregate information collected from our website
- Your rights
- How long we keep your personal information
- Changes to this policy
- Making a complaint to the Information Commissioner's Office

How and when we collect personal information

We may collect your personal information directly from you when you:

1. Communicate with us by post, telephone, text, email, social media or via our website
2. Fundraise for, or donate to Transformation
3. Donate food to or are referred to Transformation for support
4. Take campaign actions on our behalf
5. Participate in a survey or research
6. Apply to work or volunteer with us
7. Agree to help us promote our cause
8. Take part in our advocacy work as an expert by experience
9. Interact with us as a supplier, contractor, consultant or in any other capacity.

We may also collect personal information about you from other organisations, such as referral agencies (e.g. a doctor's surgery or occupational health) or from a past or current employer.

The personal information that we collect

We only collect personal information that we genuinely need. This may include:

- Contact details such as name, address, email address and phone numbers
- Date of birth
- Gender
- Nationality
- Any information that you give us relating to your circumstances and why you require our support
- Information that you provide when you donate food or financial contributions
- Information you provide when you correspond with us



- Financial information that you provide to us
- Other information about you from publicly available sources, like the electoral roll

For job and volunteer applicants, we may also collect:

- Bank account details and tax and residency status
- References from previous employers or educational institutions
- Contact details for you and any next of kin
- Qualifications
- Information concerning your health and medical conditions
- Details of unspent criminal convictions

Our legal basis for processing personal information

Our legal basis for processing personal information is usually for **our legitimate interests, with your consent, to fulfil a contract, or to meet legal obligations.**

We may process personal data if it is necessary for our legitimate interest, as long as it is fair, balanced and does not unduly impact your rights.

We will seek your consent to send you marketing emails and text messages. You can withdraw consent at any time.

Sensitive personal data will only be processed with **explicit consent**, unless there is an extreme situation where we believe someone's life is at risk.

Why we collect personal information

We collect and use personal information for a number of reasons, including:

Providing support to those in need

If you visit us for support or are referred to us, we will collect personal information to assess your needs and provide assistance.

Developing relationships with supporters

Our work is made possible by the generosity of our supporters. We may research our supporters to better understand their interests and ensure our communications are relevant and appropriate.

We may also use third-party services to:

- Cleanse and update our data to ensure accuracy
- Analyse our data to better understand supporter engagement
- Undertake research using publicly available sources (e.g., Companies House, social media)

You have the right to opt out of this activity at any time by emailing admin@transformationcpr.org

Processing donations

If you donate money, we will use your personal information to collect and record your donation. If you choose to Gift Aid your donation, we are legally required by HMRC to collect some personal details.

Handling complaints and appeals

If you raise a complaint, we will process any relevant personal information to manage and resolve it. In some cases, we may need to share your details with the third party involved in the complaint.



Promoting our cause

If you agree to help us promote our work, we may use personal information you share with us, such as photographs and stories, in case studies, publications and media features. We will always seek your consent for this.

Campaigning for change

If you sign up for one of our campaigns, we may use your details to keep you informed about relevant actions.

Carrying out surveys and research

If you take part in a survey, we may use your responses for analysis. Survey results are anonymised before being shared or published.

Employee and volunteer management

If you work or volunteer with us, we will process your personal information to manage your role, payroll and training.

For volunteers, we may use volunteer management systems provided by third-party services. These help us keep you informed of opportunities and gather feedback about your experience.

Safeguarding activities including DBS checks

For safeguarding purposes, we may process relevant personal information about employees and volunteers, including conducting necessary DBS or other checks. As outlined in our safeguarding policies, we may share personal details with relevant authorities such as the police.

Sharing personal information

We will only share your personal information where necessary, where someone's life is at risk, or if required by law.

We may share your information with third-party service providers (e.g., IT support, payment processors and mailing services) who process data on our behalf. These providers must comply with data protection laws.

We may also share information with our bank (for payments), legal advisers, HMRC and law enforcement agencies when legally required.

Cookies and aggregate information collected from our website

We use cookies to improve user experience and analyse website traffic. You can manage your cookie preferences via our website.

Your rights

You have the right to:

- Request a copy of the personal information we hold about you
- Ask us to correct inaccurate or incomplete data
- Request deletion of your data if there is no legal reason for us to retain it
- Restrict or object to the processing of your data

To exercise these rights, contact admin@transformationcpr.org. We will respond within 28 days.

Changes to this policy

This policy may change from time to time. Please check this page periodically for updates.



Making a complaint

If you believe we have processed your data unlawfully, you can complain to the Information Commissioner's Office at **0303 123 1113**.

For any queries, contact admin@transformationcpr.org