



Pandora Project

Privacy Policy

Pandora Project is committed to protecting and respecting your privacy

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and your rights and choices in relation to your information.

Who are we?

Pandora Project, registered charity number 1159470, is a local independent Norfolk charity. We provide support, advice and advocacy to women and children affected by domestic abuse.

How do we collect information about you?

This is achieved in the following ways:

Information you give us: We obtain and hold information about you when you are referred into our support service.

Information you give us indirectly by visiting our website: Like many charities, we automatically collect information about your visit to our website, for example we collect information about pages you visit and how you navigate the website, i.e. length of visits to certain pages, services you viewed and searched for, referral sources (e.g. how you arrived at our website).

Social media: When you interact with us on social media platforms such as Facebook and Twitter we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms.

Information from known third parties: We may also receive information about you from our third party partners with whom you choose to interact, for example websites such as JustGiving or Virgin Money Giving when making a donation.

This can include information such as your name, postal or email address, phone number, your geographic location, credit/debit card details and whether you are a taxpayer so that we can claim Gift Aid. To the extent that we have not done so already, we (or they) will notify you when we receive information about you from them and tell you how and why we intend to use that information.

What type of information is collected from you?

The personal information we collect, store and use may include:

- your name and contact details (including postal address, email address and telephone number)
- your date of birth
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location

- any other personal information shared with us

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We only collect sensitive data about you if there is a clear and valid reason for doing so and data protection laws allow us to, for example, if you are receiving one of our services, and depending upon what that service is, we may ask you for information about your health or about your financial information.

Where appropriate, we will make clear why we are collecting this type of information and what it will be used for.

How and why is your information used?

We may use your information for a number of different purposes, which may include:

- providing you with the services or information you have asked for
- meeting legal and regulatory obligations including safeguarding
- keeping a record of your relationship with us
- seeking your views or comments on the services we provide
- notifying you of changes to our services
- processing a volunteer or job application

How long is your information kept for?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. for health/safety and tax/accounting purposes).

We review our retention periods on a regular basis.

Who has access to your information?

We do not sell or rent your information to third parties.

We do not share your information with third parties for marketing purposes.

We may disclose your information with relevant third parties where we have a lawful basis for doing so. These third parties may include:

Healthcare providers: Where it is lawful and necessary to do so, we will share information about you with healthcare providers such as your GP.

Regulators / Safeguarding authorities / Commissioners: We will also share your personal data with these public bodies where we are required to do so by law.

The Police and other law enforcement agencies: In limited circumstances we may be required to share your personal data with the police if required for the purposes of criminal investigations and law enforcement.

IT service providers: We may use external IT providers who may have access to your personal data from time to time as is necessary to perform their services.

Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

Specific Consent

Where you have provided specific consent to us to use your personal information in a certain way, for example recording details about your support.

Legal obligation

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are required by law to process your information for safeguarding purposes.

Vital interests

Where it is necessary to protect life or health for example in the case of medical emergency or a safeguarding issue which requires us to share your information with the emergency services.

Legitimate interests

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running Pandora Project as a charitable organisation in pursuit of our aims and objectives. For example:

- undertake staff and volunteer recruitment
- understand better how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

Your Rights

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that we think apply:

Right of access

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, please get in touch.

Subject Access Requests

You have the right to ask for a copy of all information we hold about you, this request can be made verbally or in writing and we will have one month to respond. We cannot give out information about someone else unless your request is for a child for which you have PR (Parental Rights).

If the applicant is the alleged perpetrator of abuse, we can refuse the request if it is likely to cause serious physical or emotional harm to the child/victim. If the child is Gillick Competent and they clearly understand the Subject Access Request and don't want the information to be shared, we won't share it. This will be clearly recorded.

Right to restrict use

You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy or we're not lawfully allowed to use it.

Right of erasure

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to. In many cases, we will anonymise that information, rather than delete it.

Keeping your information safe

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it. We ensure that your information is only accessible by appropriately trained staff and volunteers and that all our computers and laptops are password protected and that passwords are regularly changed.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Links to other websites

Our website may contain links to other websites run by other organisations. This policy applies only to our website, so we encourage you to read the privacy statements on the other websites

you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the privacy policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand when you provide us with personal information.

Vulnerable circumstances

We are committed to protecting vulnerable clients and volunteers and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

Making a complaint

In the first instance, please contact us so that we can understand your issue and try and resolve it.

Write to us addressing your concerns to:

The Chief Executive

Pandora Project

Po Box 91

King's Lynn

Norfolk

PE38 8BW

If we can't resolve the issue, you have the right to complain to the Information Commissioners Office (ICO). The ICO is the UK's independent body set up to uphold information rights. For further information visit www.ico.org.uk