



## Privacy Policy

Prison Fellowship England and Wales is a leading prison charity, registered in the England and Wales (1102254). We are also a company limited by guarantee, registered in England and Wales (5003795). Our registered address is GF21 Harlow Enterprise Hub, Edinburgh Way, Harlow, Essex, CM20 2NQ.

This Privacy Policy explains how Prison Fellowship collects and uses your personal information. We encourage you to read this policy carefully. If you'd like to learn more about our data protection and privacy policies or discuss this further, you can contact our Support Team, who'll be happy to help.

Address: Prison Fellowship, PO Box 68226, SW1P 9WR

Phone: 020 7799 2500

Email: [info@prisonfellowship.org.uk](mailto:info@prisonfellowship.org.uk)

Our Data Protection Officer is Fiona Koefoed-Jespersen ([communications@prisonfellowship.org.uk](mailto:communications@prisonfellowship.org.uk))

***This Privacy Policy was last updated on: 5<sup>th</sup> October 2018.***

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### 1. OUR PROMISE

Prison Fellowship is committed to respecting your privacy and ensuring the personal information you have entrusted to us is held securely. We process personal information in accordance with the Data Protection Act 1998, the Privacy & Electronic Communications Regulations 2003, and the General Data Protection Regulations 2018 (GDPR).

### 2. CONTROLLERS AND PROCESSORS

A data controller determines the purposes and means of processing personal data. PF's Support Team is responsible for determining the purposes and means for processing data, i.e. how and why the data is processed. A data processor is responsible for processing personal data on behalf of a controller.

When we hold or use your personal information as a data controller we will provide you with this privacy policy which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights.

### 3. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information in the following ways:

*Directly from you when you:*

- Make a donation, or become a regular giver;
- Sign up to our mailing list to receive regular mailings from us;
- Visit our website (please see our Cookies section for more information);
- Apply to be a Prison Fellowship volunteer;
- Register to fundraise for Prison Fellowship, e.g. Ride-London-100 or the London Marathon;
- Request resources to share about Prison Fellowship's ministry locally or in your church;
- Contact us with an enquiry;
- Complete a survey;
- Become a church partner with Prison Fellowship;
- Register to host or attend a Prison Fellowship event;
- Apply for a job with Prison Fellowship.

*From other sources:*

We may use the Royal Mail's postcode finder, National Change of Address update (NCOA®) or the electoral roll, to check the accuracy of the address we hold;

Information made available publicly by Charity Commission, Companies House or information that has been published in newspapers and articles. Please read more about how we use this information in the Fundraising section.

### 4. THE PERSONAL INFORMATION WE COLLECT

***We regularly collect the following personal information from you:***

- Personal identifiers such as your title, name and date of birth;
- Contact details including postal address, post code, email and telephone numbers;
- Financial information such as your bank details;
- Whether you are a UK tax payer;
- How you found out about Prison Fellowship;
- Records of your contact with us.

***As a Prison Fellowship volunteer we will also collect:***

Information that you provide us with in your Volunteer Application Form, including:

- details about your church affiliations and personal faith;
- details about any health conditions that would impact your volunteering;
- details of criminal records;
- letters you write to your pen-pal in prison;
- records of any training you take part in as part of your volunteering.

### ***Sensitive personal data***

The GDPR recognises some information as 'sensitive personal data'. This includes, but is not limited to, information which reveals your religious beliefs, health issues, race or ethnic origin, and any criminal convictions.

Prison Fellowship is a faith based organisation, and where necessary, we may collect details about your church affiliations and personal faith.

We may also receive prayer requests and the information may reveal sensitive personal data. As Prison Fellowship, we share and pray for these needs at our internal prayer sessions.

Prison Fellowship will always treat any sensitive personal data we process with greater care and process the information in accordance with the Data Protection Act.

## **5. WHY WE COLLECT YOUR PERSONAL INFORMATION**

- To process regular giving payments and any other donations;
- To reclaim tax on Gift Aid donations, if applicable;
- To verify that you are over 18 and if not, obtain permission from your parent/guardian to process your information or accept any regular donations;
- When you visit our website, we may gather information about which pages you visit to help us improve and provide you with the best service;
- To determine and improve the effectiveness of our website and marketing campaigns;
- To create and manage effective partnerships with UK Churches;
- To keep you informed about our work (please see more details in the Marketing Permissions section);
- To enable us to contact you with relevant and the most appropriate information. Please see more details in the Fundraising section;
- To manage and coordinate our volunteers;
- For compliance with employment law and other statutory requirements.

## **6. CREDIT AND DEBIT CARD PAYMENT INFORMATION**

When you make a donation to us online or over the phone, Prison Fellowship ensures that this is done securely and in accordance with the Payment Card Industry Data Security Standard. Credit or debit card details are never recorded or stored in any of our systems on completion of your transaction. Remember: don't send an email with any credit or debit card details.

## **7. MARKETING PERMISSIONS**

We love sharing news and stories about how your support is transforming lives in prison. This includes sending you information about our work, news, appeals, events, information on volunteering and prayer requests.

We will always ask for your permission to contact you by email or post for marketing purposes, and your details will never be shared with or sold to any third party for marketing purposes.

Prison Fellowship is committed to respecting your choice to receive marketing information. You can update your permission and contact preferences at any time by:

- Calling our Support Team on 020 7799 2500
- Emailing [info@prisonfellowship.org.uk](mailto:info@prisonfellowship.org.uk)
- Clicking the 'unsubscribe' link included in the footer of each email communication we send

## 8. FUNDRAISING

Prison Fellowship delivers life-transforming programmes in prisons across England and Wales, including *Sycamore Tree* - our restorative justice and victim awareness course; *Angel Tree* - our gift programme for children of prisoners, and mothers of young offenders; *Letter Link* – creating supportive connections between volunteers and prisoners through regular letters; and providing diverse and vital support to prison chaplaincies through our volunteer presence.

Fundraising is essential for Prison Fellowship to make a lasting difference in the lives of prisoners and their families. To fundraise more efficiently and steward our resources with integrity and excellence, we conduct research to gain a better understanding of our supporters. This helps us to personalise our funding requests for supporters with the interest and ability to support our programmes. The research involves compiling information you've provided to us with general information from:

- *Publicly available sources* - this may include information found from sources such as Companies House and other information that has been published in articles/newspapers.
- *Social Media* - you may give permission for your information to be viewed publicly depending on your settings or the privacy policies for social media and messaging services like LinkedIn.

You can contact us at any time to opt-out of your personal information being processed in this way by emailing [info@prisonfellowship.org.uk](mailto:info@prisonfellowship.org.uk) or calling us on 020 7799 2500.

## 9. WHO WE SHARE YOUR INFORMATION WITH

We may share your personal information with trusted third parties where it is necessary to provide products you have requested from us or where they are contracted to develop or maintain our systems.

We monitor information security compliance and have written contracts which obligate our partners or third party providers to process your personal information only on our instructions and in accordance with applicable data protection and privacy laws.

Prison Fellowship may be under duty to disclose your personal information where required in order to comply with any legal obligation.

## **10. HOW LONG WE KEEP YOUR DATA**

Prison Fellowship will only keep your personal information for as long as it is required and in accordance with statutory requirements. For example, HMRC requires that we keep a record of your name, address and Gift Aid declaration for six years from the date of your last donation. Where the information is no longer required, we will ensure that it is disposed of in a secure manner.

If you have indicated that you do not wish to hear from us in the future, we will keep the minimum information necessary to ensure we avoid contacting you any further.

## **11. SECURITY**

PF employs a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access, use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

## **12. YOUR INFORMATION RIGHTS AND CHOICES**

The GDPR gives you the right:

- To request in writing and securely obtain copies of the personal information Prison Fellowship holds about you;
- To correct or update your personal information processed by Prison Fellowship;
- To request Prison Fellowship to stop using your personal information for marketing purposes or for any other purpose where there is no legal requirement for continued processing.

The Privacy and Electronic Communications Regulations (PECR) gives you the right:

- To choose whether or not to receive marketing communication from us by email, text or telephone. Please see the Marketing Permissions section for more information about how to change or update your contact permissions and preferences.
- To know about the cookies Prison Fellowship uses, so that you can decide whether to give us permission to store a cookie on your device. Please see the Cookies section for more information.

For more information about your information rights visit [www.ico.org.uk](http://www.ico.org.uk)

## **14. COOKIES**

Cookies are small text files that are placed on your computer by websites that you visit. Prison Fellowship uses cookies to enable our website to function effectively, to improve your experience and to determine and improve the effectiveness of our website and marketing campaigns.

Here is a brief overview of the types of cookies we use on the Prison Fellowship websites, which consist of four categories:

- CMS cookies – our Prison Fellowship website is created in a CMS (Content Management System) called WordPress, which places a small number of standard WordPress cookies on your computer as you use it. Additional cookies will be placed on your computer if you are an editor on this CMS system (for example if you are a Prison Fellowship staff member or an IT contractor).
- Cookies to improve your experience – we use a small number of cookies on our website to help you get the best experience. Similarly, the first time you load the Prison Fellowship homepage, you will see a notice at top of the page about cookies. We place a cookie on your computer when you press 'X', so that you don't see this notice in future. We also embed YouTube and Vimeo films on our website regularly. We are unable to prevent these sites, or external domains, from collecting information on your usage of this embedded content. If you are not logged in to these external services then they will not know who you are but are likely to gather anonymous usage information for example, number of views, plays, loads etc.
- Analytics – Examples include Google Analytics. Google Analytics cookies collect information about how visitors use a website and help us to continually improve our website. For instance, which pages visitors go to most often and if they get error messages from web pages. These cookies don't collect information that identifies you. All information these cookies collect is aggregated and therefore anonymous. Prison Fellowship uses this data to help us to understand: which pages people visit on the site, which internet browsers are being used, what is popular on our website, which pages on the website are visited before people donate or register to volunteer.
- Paid advertising (Google, Facebook and Bing) – we use cookies from trusted third parties to measure the effectiveness of paid advertising to ensure the money we spend is used effectively. They also enable us to either service advertisements to or exclude people who have visited our websites. Cookies from Google, Bing and Facebook allow us to track traffic to our website to tell us if our marketing campaigns are successful, and ensure we are spending our advertising budgets as efficiently as possible.

*How to manage your cookie settings:*

Many web browsers such as Internet Explorer, Google Chrome or Safari, will allow some control over cookies through their settings. To manage your cookie settings, please refer to your browser software. For more information about cookies and how to delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

*Acceptance of cookie use:*

By using our website, you agree to our use of cookies. This is subject to any preferences or browser setting you may have.

## 15. LOG FILES

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

## 16. WEBSITE COMMENTS AND MEDIA

- Comments - When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.
- An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.
- Articles on our website may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

## 17. REPORTING CONCERNS

Please contact us if you have any questions, or would like to raise a concern about Prison Fellowship's handling of your personal information. You can contact our Data Protection Officer by emailing [communications@prisonfellowship.org.uk](mailto:communications@prisonfellowship.org.uk) or calling 020 7799 2500.

You also have the right to lodge a complaint with the Information Commissioner's Office about how we manage your data.

## 18. CHANGES TO THIS PRIVACY NOTICE

Prison Fellowship will review our privacy notice regularly. The terms of this notice may be updated at any time, for example, in the event of changes in law and how we operate. Please do check our website from time to time. If there are any significant changes in the way we process your personal information, we will provide a prominent notice on our website or send a notification. This notice was last updated on 5<sup>th</sup> October 2018.

**Thank you from everyone at Prison Fellowship for your continued support  
and generosity towards our ministry with men and women in prison.**

**You are transforming lives for good.**