The MMHS Privacy Policy

Description

The Methodist Ministers' Housing Society (MMHS) is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection, the Data Controller is MMHS.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers MMHS in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information, please contact the <u>Data Compliance Officer</u> or otherwise refer to contact/helpline or by post to: The Data Compliance Officer, Methodist Ministers' Housing Society, Methodist Church House, 25 Marylebone Rd, London NW1 5JR.

What type of personal information we collect

The type and amount of information we collect depends on why you are providing it.

The information we collect when you make an enquiry will include some or all of the following: your name and personal details, financial and banking details, employment details, vetting checks, safeguarding information, goods and services, visual images and/or personal information relevant to housing needs.

If you are a supporter, for example making a donation we will ask you for your name and contact details (your full address and email address).

We will collect information such as bank details to enable us process your donation or payment. These transactions are processed securely internally.

If you are a potential resident, current resident or job applicant the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

How we collect information

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit our website (see our Cookies policy)
- donate to us or fundraise for us
- enquire about our activities or services
- sign up to receive news about our activities
- attend a meeting with us and provide us with information
- take part in our events
- contact us in any way including online, email and phone,

Where we collect information from

We collect information:

(1) From you when you give it to us directly: You may provide your details when you ask us for information, apply for a home with us, make a donation, attend our events or contact us for any other reason.

(2) When you give it to us indirectly: Your information may be shared with us by other organisations such as fundraising sites like Just Giving or Virgin Money if you are fundraising for us. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.

(3) When you have given other organisations permission to share it: Your information may be provided to us by other organisations if you have given them your permission. This might for example be a charity working with us or might be when you buy a product or service from a third party organisation. The information we receive from other organisations depends on your settings or the option responses you have given them.

(4) When you use our website: When you use our website information about you is recorded and stored. See the information about the use of cookies under that heading below.

How we use your information

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

• providing you with the information or services you have asked for

- processing donations you make, including processing for Gift Aid purposes
- when necessary for carrying out your obligations under any contract between us
- seeking your views on the services or activities we carry on so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted

• analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness

Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

• Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us.

• This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.

• It is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract.

• It is necessary to comply with our legal obligations for example financial records are kept for six years from the date of the last transaction.

• Where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.

• Where there is a legitimate interest we will provide information to third parties such as contractors, health service providers, legal representatives, payroll and pension providers in order to carry out our obligations to potential, current and former residents and also staff.

How we keep your information safe

We understand the importance of security of your personal information and take appropriate steps to safeguard it.

Information is stored in locked cabinets. Information stored on computers is password protected. More sensitive files are individually password protected.

We always ensure only authorised persons have access to your information, which means only our staff and contractors, and that everyone who has access is appropriately trained to manage your information.

No data transmission over the internet can however be guaranteed to be 100% secure. So while we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

Who has access to your information?

• Third parties who provide services for us, for example Payroll service providers, contractors, legal services providers and pension providers]. We select our third party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.

• Analytics and search engine providers that help us to improve our website and its use.

• Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another charity. In such event we will take steps to ensure your privacy rights will be protected by the third party.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

Keeping your information up to date

We really appreciate it if you let us know if your contact details change. You can do so by contacting us.

Our use of "cookies"

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to make sure that the site reflects your needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you want to prevent our cookies being stored on your computer in future, you may do so by referring to your internet browser's instructions. You can do this by clicking on the "Help" menu. Please note, however, that if you disable our cookies you may not be able to access certain services or facilities on our site and your use of our site may be restricted. Further information on deleting or controlling cookies is available here.

Children's Information

Where sensitive information is held by MMHS relating to children – this is stored securely and only shared with staff on a 'need to know' basis.

How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for [two] years. We may periodically ask you to renew your consent.

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing. No charge may be made under GDPR except in very limited circumstances which will be explained to you if relevant. To make a request contact us.

You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the "right to be forgotten");
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for

re-use (known as the "right to portability");

• rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions. You can find more about your rights <u>here</u>. To exercise any of these rights, you should contact the Data Compliance Officer at the above address.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found here.

Changes to this Privacy Policy

This Policy may be changed from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information.

Do please check this Policy each time you consider giving your personal information to us.

This Policy was last updated in May 2018.

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