

The Deaf Academy -Website Privacy Policy

The Deaf Academy is part of Exeter Royal Academy for Deaf Education, which includes the Deaf Academy and Rolle House Children's Home. This privacy policy will explain how our organisation uses the personal data we collect from you when you use our website, www.thedeafacademy.ac.uk

This policy covers:

- How we collect information
- Where we collect information from
- What type of information we collect
- How we use your data
- How we store your data
- Who we share your data with
- Our legal basis for processing your data
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage your cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

How we collect information

We may collect information about you whenever you interact with us, for example when you:

- Enquire about, sign-up for or access one of our events or services, visit our website or support us financially
- Sign up to receive updates on a campaign or our activities
- Create or update a website registration
- Post content to our website/social media sites (including Facebook)
- Volunteer for us
- Attend a meeting with us and provide us with information about you
- Take part in one of our events
- Fundraise on our behalf
- Contact us through any channel, including online, email, phone, SMS, social media or post
- We may also receive information about you from third parties – but only if you have given consent to this type of sharing
- If you work for us
- Apply for a job vacancy

- Apply for a volunteer opportunity

Where do we collect information from?

We may collect information in the following ways:

When you give us information directly, for example:

- a) request specific information which requires us to obtain your details,
- b) provide data on other family members (with permission to do so),
- c) make a donation,
- d) campaign for us or participate in one of our events.

When you give us information indirectly:

Your information may be shared with us when you use other fundraising sites and provide your consent to be contacted by the Deaf Academy, for example if you are fundraising for us via JustGiving. These organisations will have their own privacy policy and/or privacy statements, so we recommend you look at these to ensure you understand how they use your data.

Social media:

Depending on your settings or the privacy policies for social media and messaging services like Facebook, Twitter LinkedIn, Instagram and YouTube, you might give us permission to access information from those accounts or services. These organisations will have their own privacy policy and/or privacy statements, so we recommend you look at these to ensure you understand how they use your data.

We collect information when you are using our website: upon visiting our website information about your visit is recorded and stored. See cookies section below on the use of cookies for more details.

When your information is available from other public sources: We may collect personal details about you from the public domain, such as from social networks, company websites, political and property registers, and news archives. We may use data services agencies to collect this information. Please see the how we use your information below for more details.

What type of personal information we collect

The type and quantity of information we collect and how we use it depends on why you are providing it.

If you support us, for example by making a donation, volunteering, registering to fundraise, signing up for an event or campaigning for us, we may collect where relevant:

1. Your name, date of birth, email address, postal address, telephone number and information necessary to process a donation or regular contribution like credit/debit card details or bank details.

2. We may also collect other information, for example health or dietary information from people attending our events, information on next of kin so we know who to get in contact with if there is a problem at an event you attend.
3. We also collect information on your experience of deafness or the experiences of a child or relative. We will never process sensitive personal information (special category data, in our case information about deafness and other health information) about you without your consent.
4. We also gather general information about the use of our websites, such as which pages people visit most often and which services, events or facilities are of most interest. We may also track which pages people visit when they click on links in emails from us. We may use this information to personalise the way our website is presented when people visit them, to make improvements to our website and to ensure we provide you with the very best service we can. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our websites.
5. If you contact us, for example by telephone, letter, fax, email or via social media (e.g. Facebook, Twitter, or via Skype) or respond to a contact we make to you, we may keep a record of that correspondence so that we are able to refer to it in future, and keep a record of the kind of issues people raise.
6. When we send communications to you, we will record details of these along with any actions you take as a result, such as support given (e.g. donations), other actions taken (e.g. helping with our campaigning), or requests you make to change the way that we communicate with you in the future.
7. We will log information onto our database systems to retain a history of what you have requested and to ensure that we comply with any requests or complaints that you have made. This information will be held in line with our Data Retention Policy.

How will we use your data?

The Deaf Academy collects information for:

1. For marketing purposes to further our charitable aims, for instance fundraising and campaigning activities.
2. When we get in touch for marketing purposes, we will ask you whether you are happy for us to continue to contact you in this way.
3. In all marketing communications, (e.g. fundraising or campaigning) we will give you an opportunity to opt out of that particular type of communication.
4. We may contact you via post or phone on the basis of it being in our legitimate interests to do so, unless you have told us you do not want us to contact you in that way.
5. We may contact you via email where you have expressed a preference for a particular type of communication or where you have opted-in to these channels.
6. Your privacy is important to us and so far as possible we will not send you any type or method of communications you tell us that you do not want to receive. When we first record your personal details, we will ask you how you want us to keep in touch or sign post to our Privacy Notice.
7. You can opt-out of receiving marketing communications or contact us to change your preferences at any time, by contacting us on the details below.

Service provision

8. To provide you with the services, products or information you have requested.
9. To update you about any changes to our services.
10. To ensure we are providing the best possible service, e.g. monitoring complaints.
11. To give you information about other relevant services or products provided by partners we are working with.

Profiling

12. We may make use of the personal information we hold by creating a profile of your interests, preferences and likely giving behaviour so that we can contact you in the most appropriate way and with the most relevant information, including for fundraising and campaigning purposes. We might also use additional information to create this profile, for instance information about the financial and demographic characteristics of your postcode in order to assess your potential ability to give or assist us further. If you would prefer us not to create this kind of profile please let us know. We will record and act on this request.

Website

13. To analyse your website behaviour.
14. To analyse and improve the operation of our website (see section on cookies below for further details).
15. To create an account for you if you register with us online.

Data sharing

16. We will never allow any other organisation access to the data we hold about you for their own marketing purposes. In order to manage our relationship with you effectively, we may need to share your information with our service providers, associated organisations and agents who support us in our work. Where we do so, we will take care to ensure that they keep your data secure (see Who we share your personal data with below).

Administrative

17. For administration purposes.
18. To maintain our organisational records and ensure we have your most up-to-date marketing preferences.
19. To help us improve our services, campaigns, fundraising or information-offering.
20. To respond to any correspondence you have entered into with us including by letter, email, fax, social media or other means and contact you in relation to any interaction you have with us, including donations, your regular Direct Debit, activities in relation to your child, application forms or any online content you have signed up for.
21. We might use a range of additional information sources to do this, including information from commercial suppliers. If you would prefer we didn't do this, please let us know.
22. To administer your payments and donations, including Gift Aid processing.

Recruitment

23. To administer your applications.
24. To communicate with you on job vacancies.

How do we store your data?

We place great importance on the security of your personal information and will always take appropriate precautions to protect it.

We ensure that there are appropriate technical controls in place to protect your personal details. For example, we use encryption technology on our websites and carry out regular security reviews on our network.

We always ensure only authorised personnel (for example our staff, volunteers or contractors) have access to your information, and that they are appropriately trained to manage your data. We have nominated Data Protection Officers who advise on data collection, and are trained for this purpose.

All of our online forms are protected by encryption. When you make a donation through Just Giving, they also use a secure server that meets the required Payment Card Industry (PCI) Security Standards. We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate and up to date and kept only for the purposes for which it was collected.

Despite all of our precautions, no data transmission over the internet can be guaranteed to be 100% secure. While we strive to protect your personal information, we cannot guarantee the security of any information you disclose to us online, and you must understand that you do so at your own risk.

Who do we share your data with?

We may at times use external organisations that collect and/or process personal data on our behalf; for example survey providers or email marketing platforms.

We may legally be required to disclose your details if required to by the police or for regulatory reasons. We will only ever share your data in other circumstances if we have your consent to do so.

We also use social media monitoring tools such as Hootsuite. This involves social channels (such as Facebook) sharing the data directly with Hootsuite; therefore the data is not provided by us. This will be covered by the channels' privacy policies.

SurveyMonkey

We sometimes use online software such as SurveyMonkey to conduct surveys. If you click through to SurveyMonkey or similar websites, they may use both session cookies and persistent cookies. See SurveyMonkey's privacy statement for more information.

Mailchimp

We may also use an online email and form service provided by Mailchimp to contact you if you sign up to our regular communications. See Mailchimp's privacy statement for information on how they use your data.

How long we keep your information for

We will only keep your personal information for as long as is necessary for the purposes outlined in this statement, and in any case within limits set out by law. However, where it is possible we may anonymise information so that it cannot be linked back to an individual, in which case it may be kept for longer.

We have some common groups of data, information that relates to regulated or nonregulated positions or activities. For non-regulated this is usually 10 years after the event or person has left, for regulated this is usually up to 100 years depending upon any safeguarding related information. Where we are regulated by Ofsted then event information will be retained for 15 years for people working on Ofsted activities.

Income from gifts in wills is vital to the running of the charity. We may keep data you provide to us for a period sufficient to enable us to carry out administration of such gifts and communicate effectively with the families of people leaving us gifts in their will. This also enables us to identify and analyse the source of legacy will income we receive. In these cases we may retain the data for up to 5 years.

Our legal basis for processing your data

We ensure that we have a lawful basis to collect and use your personal data.

In many cases we will seek explicit consent to process your personal and special category data. We will also often process personal data for the performance of a contract. In some instances we may process your information where it is in our legitimate interests to do so and where we are confident that such processing is not likely to unduly prejudice your interests, rights and freedoms.

The law allows for six grounds for processing people's personal data, of which four are relevant for our activities:

- we process your information on the basis of your consent
- we process your information on the basis of a contractual relationship
- we process your information on the basis of having legitimate interest to do so
- we process your information on the basis of having a legal requirement to do so e.g. employee data

Consent

We will process your data if you have provided consent: this will include contacting you for marketing and fundraising purposes by e-mail, phone and SMS.

Contractual relationship

The vast majority of our relationships with our supporters and members are voluntary as opposed to contractual, but there may be occasions where we have agreed to send you

information in exchange for payment or a commitment to raise funds on our behalf – in which case we will do so unless you have told us you do not wish to receive it.

Legitimate interests

In some cases we will make a balanced judgement on whether we have a legitimate interest for storing and processing your data and using it to contact you without having gathered your explicit consent. The law allows for us to collect and use your data if it is necessary for a legitimate business interest, as long as we use it in a fair and balanced way that does not unduly prejudice your rights.

Our Legitimate Interests for processing personal data include:

- Governance
- Delivery of our charitable purpose
- Statutory reporting
- Reporting criminal acts and compliance with law enforcement agencies
- Internal and external audit for financial or regulatory compliance purposes
- Operational Management
- Employee and volunteer recording and monitoring for recruitment, safety, performance management or workforce planning purposes
- Provision and administration of staff benefits such as pensions
- Physical security, IT and network security
- Processing for historical or statistical purposes
- Publicity and Income Generation
- Sending direct marketing by post
- Personalisation used to tailor and enhance customer and supporter experience in our offline and online communications
- Analysis, targeting, and segmentation to maximise the cost-effectiveness and reach of our communications
- Processing for research purposes (including marketing research)
- Purely administrative purposes
- Responding to any solicited enquiry from any of our stakeholders
- Delivery of requested products or information packs
- Administration of Gift Aid
- 'Thank you' communications and receipts
- Administration of existing financial transactions
- Maintaining 'Do not contact lists'
- Financial Management and Control
- Processing of financial transactions and maintaining financial controls
- Prevention of fraud, misuse of services, or money laundering
- Enforcement of legal claims including debt collection via out-of-court procedures
- Administration of supporters' estates and/or gifts in wills where we have been named as beneficiary or executor
- In extreme situations, we may share your personal details if we believe that it is in your 'vital interests' to do so (e.g. if you are taken ill at one of our events we might share your details with emergency services), or if we are compelled by law to do so.

What are your data protection rights?

The Deaf Academy would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data from the Deaf Academy.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request we complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: reception@thedeafacademy.ac.uk.

Or write to us: The Deaf Academy, 1 Douglas Avenue, Exmouth, EX8 2AU

For more information on these rights, please [read the relevant guidance issued by the ICO](#).

If you would like to make a complaint about how we process your personal data, please contact our [Data Protection Officer](#).

If you are not happy with how your complaint is dealt with, you should contact the Information Commissioner's Office. Alternatively, you are entitled to make a complaint to the Information Commissioner's Office without first referring your complaint to us.

For further information, please see the [Information Commissioner's guidance](#).

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, see our cookies policy.

How do we use cookies?

The Deaf Academy uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – our website uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – our website uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

The Deaf Academy website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

The Deaf Academy keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 5 June 2020.

How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: reception@thedeafacademy.ac.uk

Or write to us at: The Deaf Academy, 1 Douglas Avenue, Exmouth, EX8 2AU

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that the Deaf Academy has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office - <https://ico.org.uk/>

Email: <https://ico.org.uk/global/contact-us/email/>

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113