

This privacy notice tells you what to expect us to do with your personal information when you make contact with us.

We'll tell you:

- why we are able to process your information
- what purpose we are processing it for
- whether you have to provide it to us
- how long we store it for
- whether there are other recipients of your personal information
- whether we intend to transfer it to another country, and
- whether we do automated decision-making or profiling.

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## Part 1 – General information

### Information about us

Crohn's & Colitis UK is the controller for the personal information we process, unless otherwise stated. There are many ways you can contact us, including by phone, email, live chat and post. More details can be seen [here](#).

Our postal address:

First floor, Helios Court  
1 Bishop Square, Hatfield Business Park  
HATFIELD  
Herts  
AL10 9NE  
Helpline number: **0300 222 5700**

Our Data Protection Compliance Lead is Andrew Adie, Director of Finance and Corporate Services. For details of responsibilities held relating to data protection please see our [Data Protection Policy](#).

### Personal information we capture and process

Most of the personal information we process is provided to us directly by you because:

- You have used one of our support services e.g. helpline, information
- You have applied for a personal grant
- You have made a donation to us
- You wish to attend, or have attended, an event
- You have asked to be informed of patient trial or patient forum opportunities
- You have completed the IBD Survey
- You have applied for a research grant from us
- You are representing your organisation
- You are a health or related professional who provides us with advice
- You have become a subscribing member
- You have offered to volunteer for us
- You have applied for a job or secondment with us
- You have had your photograph taken by us

We also receive personal information indirectly, in the following scenarios:

- From other regulators or law enforcement bodies because you have made a complaint to them about an aspect of our service
- Carers, particularly of children with Crohn's and Colitis, have given details of the person they care for in order to access support services on their behalf
- An employee of ours gives your contact details as an emergency contact or a referee.
- An Occupational Health Adviser has given information and advice on an employee's need for work adjustment etc.

If it is not disproportionate or prejudicial, we'll contact you to let you know we are processing your personal information.

When someone visits our [website](#) we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone.

We do not make any attempt to find out the identities of those visiting our website.

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

**Use of cookies** - Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site e.g. users are not able to vote multiple times on a poll.

### Your rights under Data Protection law

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

**Your right of access** - You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this right here.](#)

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here.](#)

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this right here.](#)

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this right here.](#)

**Your right to object to processing** - You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests. [You can read more about this right here.](#)

**Your right to data portability** - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this right here.](#)

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

Please contact us (see details above) if you wish to make a request.

## Sensitive data

We sometimes process data that is legally referred to as sensitive data for example:

- You have informed us that you (or someone you are a carer for) suffers from Crohn's Disease or Ulcerative Colitis and want information tailored to your condition
- You take part in patient panels and clinical trials and only wish to consider opportunities relevant to your condition
- You are an employee and have provided health and/or disability information to ensure suitable and safe working conditions
- You undertake an employed or voluntary role that necessitates making a Disclosure and Barring check or provide a self-disclosure of criminal convictions
- You complete an equal opportunities monitoring form

## How long we keep personal information

For more information about this please see part 2.

For more information on your rights, please see '[Your rights as an individual](#)'.

## Sharing information

We use data processors who are third parties who provide elements of services for us: for example we use Dot Mailer to provide bulk emails for newsletters etc. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

We use an external company to gather information about some of our supporters from publicly available sources, for example, Companies House, the Electoral Register, company websites, social networks such as LinkedIn, political and property registers and new archives. Through this company we may also carry out wealth screening for research using our trusted third-party partners.

Please note all data is confidential and is not kept by external companies longer than the work being carried out.

In some circumstances we are legally obliged to share information. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

## Complaints

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at [send us a message](#) and we'll respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the [Information Commissioner's Office](#). Please follow this link to see how to do that.

If you are unhappy with our fundraising practice and do not feel that your concerns have been resolved satisfactorily after approaching us then you can also refer this to the [Fundraising Regulator](#).

We keep our privacy notice under regular review to make sure it is up to date and accurate.

### Helpline data

When you call our main helpline (0300 222 5700), we collect Calling Line Identification (CLI) information. This is the phone number you are calling from (if it's not withheld). We hold a log of the phone number, date, time and duration of the call, and a recording of the conversation.

We use this information to understand the demand for our services and to improve how we operate. We may also use the number to call you back if you have asked us to do so, if your call drops, or if there is a problem with the line. We may also use it to check how many calls we have received from it.

We also hold statistical information about the calls we receive for a number of years, but this does not contain any personal data.

### Data captured via digital systems e.g. social media

#### Social media

We use a third-party provider, Hootsuite, to manage our social-media interactions. If you send us a private or direct message via social media, it will be stored by Hootsuite for three months. It will not be shared with any other organisations.

We see all this information and decide how we manage it. For example, if you send a message via social media that needs a response from us, we may process it in our case management system as [Send us a message](#)

#### Live chat

We use a third-party provider, [Call Handling Services](#), to supply and support our live chat service.

If you use this service, we'll collect your name and the contents of your live chat session. We'll also collect your email address, if you choose to provide it, in order to receive a transcript of the chat. We'll generally keep this information for two years.

Call Handling Services will keep your information only for as long as they need it to provide you with the goods, services or information you have required, to administer your relationship with them, to comply with the law, or to ensure they do not communicate with people that have asked them not to. When they no longer need information, they will always dispose of it securely, using specialist companies if necessary to do this work.

#### Emailing us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government guidance on email security. Most webmail such as Gmail and Hotmail use TLS by default.

We'll also monitor any emails sent to us, including file attachments, for viruses or malicious software. You must ensure that any email you send is within the bounds of the law.

## Analytics

When you visit [our website](#), we use two third-party services:

- **Google Analytics** to collect standard internet log information and details of visitor behavior patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.
- **Hotjar** assists us to provide our end users with a better, simpler and user friendly experience and service as well as diagnosing technical problems and analysing user trends. You may opt-out from having Hotjar collect your information when visiting our website at any time by visiting their [Opt-out](#) page and clicking 'Disable Hotjar' or enabling Do Not Track (DNT) in your browser.
- **Dot Mailer** processes sign up forms on our behalf as well as providing bulk email services.
- **Engaging Networks** provides data matching services. They will only do this when you opt in for this.
- **Typeform** also processes some sign up forms but is primarily used for feedback forms where providing your personal identifying data is optional.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

## Website search engine

Our website including the search engine is powered by [Electric Putty](#) with their hosting partner [Clook](#). Search queries and results are logged anonymously to help us improve our website and search functionality. No identifiable personal information is collected by us or Electric Putty currently but with the introduction of a new CRM system in our organisation later this year we will be able to directly input information needed to provide services.

## Cookies

You can read more about how Electric Putty uses cookies in their [Cookies policy](#). We use a cookies tool on our website which relies on implied consent of users. In recognition of the fact that the implementation date for the revised e-Privacy Regulation remains unknown, we are taking reasonable steps now to align our use of cookies the standard of consent required by GDPR.

This means that we are in the process of updating the tool (Civic Cookie Tool) which, by default, requires explicit opt in action by users of our website. This will apply to the non-necessary cookies. We will ensure any necessary cookies for functionality and security are marked so that they are not deleted by the tool.

## Security and performance

Electric Putty and Clook help maintain the security and performance of our website. The service checks that traffic to the site is behaving as would be expected. The service will block traffic that is not using the site as expected. To provide this service they process site visitors' IP addresses and hold this information for up to 12 months.

## Purpose and legal basis for processing

The purpose for implementing all of the above is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users. The legal basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

## What are your rights?

As we are processing your personal data for our legitimate interests as stated above, you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see [‘Your rights as an individual’](#).

## Data security and visitors

We meet visitors at our head office, including:

- dignitaries;
- external training providers;
- job applicants;
- suppliers and tradespeople;
- supporters (including members, volunteers and donors); and
- organisations and healthcare professionals interested in supporting our work or research programmes.

If your visit is planned, we’ll send your name and visit information to reception before your visit.

You must wear a pass throughout your visit. Personalised badges will be destroyed when you leave the premises.

We ask all visitors to sign in and out at reception and show a form of ID. The ID is for verification purposes only, we don’t record this information.

Any CCTV used in our office is not operated by us, so we are not the controller. It will be under the control of the relevant building landlord.

We have Wi-Fi on site for the use of visitors. We’ll provide you with the address and password.

We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received.

We don’t ask you to agree to terms, just to the fact that we have no responsibility or control over your use of the internet while you are on site, and we don’t ask you to provide any of your information to get this service.

The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The legal basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

## Part 2 – Specific information about how we treat personal information when...

You have used one of our support services e.g. helpline, information

<b>Data type held:</b>	<b>Contact details</b>	<b>Communication preferences</b>	<b>Crohn's or Colitis sufferer</b>	<b>Date of birth/age</b>	<b>Record of transactions</b>
<b>Requirement</b>	Optional	Mandatory for DM only	Optional	Only if a child	Mandatory
<b>Purpose</b>	In order to communicate to provide follow on service, send information etc. as requested	In order to send direct marketing communications of interest to enquirer	Provide condition specific advice Establish credibility to speak for IBD patients	Provide age specific advice	In order to provide continuity of service and avoid retelling "story"
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM ?Email systems	CRM	CRM	CRM	CRM
<b>Retention</b>	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact
<b>Sharing</b>	Not shared	Not shared	Not shared	Not shared	Not shared

You have applied for a personal grant

<b>Data type held:</b>	<b>Contact details</b>	<b>Crohn's or Colitis sufferer</b>	<b>Financial Circumstances</b>	<b>Record of transactions</b>
<b>Requirement</b>	Mandatory	Mandatory	Mandatory	Mandatory
<b>Purpose</b>	In order to communicate to provide follow on service, send information etc. as requested	Establish eligibility for grant	Establish eligibility for grant	In order to provide continuity of service
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM Email systems	CRM Email systems	CRM Email systems	CRM
<b>Retention</b>	5 years after grant award or 2 years after grant rejected.	5 years after grant award or 2 years after grant rejected.	5 years after grant award or 2 years after grant rejected.	5 years after grant award or 2 years after grant rejected.
<b>Sharing</b>	Not shared	Not shared	Not shared	Not shared

You have made a donation to us

Data type held:	Contact details	Communication preferences	Crohn's or Colitis sufferer	Date of birth/age *	Bank details **	Record of interactions	Relationships
<b>Requirement</b>	Optional	Mandatory	Optional	Mandatory for children only	Mandatory for DD only	Mandatory	Optional
<b>Purpose</b>	In order to thank you	In order to send direct marketing communications of interest to you	Target specific condition communications. Establish credibility to speak for IBD patients	In order to communicate age appropriately	To process donations by Direct Debit	In order to provide continuity of service and recognise commitment	To identify family memberships / carers of children etc. and communicate appropriately
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)a Consent for use as supporter	6(1)a Consent for use as a supporter	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use as a supporter
<b>Storage</b>	CRM Email systems	CRM Storage in spreadsheet for uploading	CRM	CRM	CRM Storage in spreadsheet for uploading	CRM Email systems	CRM
<b>Retention</b>	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact
<b>Sharing</b>	Shared with contracted supplier for mailing	Not shared	Not shared	Not shared	Contracted supplier for processing payments	Not shared	Not shared

\* Not currently collected but intending to introduce for children to avoid lotteries etc.

\*\* Credit/Debit card and cheque details are not recorded beyond payment processing



You have asked to be informed of patient trial or patient forum opportunities

<b>Data type held:</b>	<b>Contact details</b>	<b>Communication preferences</b>	<b>Crohn's or Colitis sufferer</b>	<b>Date of birth/age</b>	<b>Record of transactions</b>	<b>Relationships</b>
<b>Requirement</b>	Mandatory	Mandatory for DM only	Mandatory	Mandatory for children only	Mandatory	Mandatory
<b>Purpose</b>	In order to provide opportunity details and gather feedback	In order to send direct marketing communications of interest to the patient	Target specific condition opportunities	In order to communicate age appropriately	In order to provide continuity of support to the patient	To identify family memberships / carers of children etc. and communicate appropriately
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM ?Email systems ?Spreadsheets for mailing	CRM	CRM	CRM	CRM	CRM
<b>Retention</b>	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact
<b>Sharing</b>	Not shared unless some form of joint forum when data subject will be specifically informed	Not shared	Not shared	Not shared	Not shared	Not shared

You have completed the IBD Survey

<b>Data type held:</b>	<b>Contact details</b>	<b>Communication preferences</b>	<b>Crohn's or Colitis sufferer</b>	<b>Date of birth/age</b>	<b>Record of transactions</b>	<b>Relationships</b>
<b>Requirement</b>	Mandatory	Mandatory for DM only	Optional	Mandatory for children only	Mandatory	Mandatory
<b>Purpose</b>	To enable us to contact you about the survey	In order to send direct marketing communications of interest to you	Target specific condition mailings and information	In order to communicate age appropriately	In order to provide continuity of service	To identify family memberships / carers of children etc. and communicate
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM Email systems Spreadsheets for mailing	CRM	CRM	CRM	CRM	CRM
<b>Retention</b>	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact
<b>Sharing</b>	Shared with contracted supplier for mailing	Not shared	Not shared	Not shared	Not shared	Not shared

You have applied for a research grant

<b>Data type held:</b>	<b>Contact details</b>	<b>Qualifications</b>	<b>Relationships/associates</b>	<b>Bank details</b>	<b>Record of transactions</b>
<b>Requirement</b>	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
<b>Purpose</b>	In order to communicate to provide follow on service, send information etc. as requested	Establish eligibility for grant	Establish potential collaboration and conflicts of interest.	To transfer funding for grants.	In order to provide continuity of service
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM Email systems Electronic filing including online portal for Committee	CRM Email systems Electronic filing including online portal for Committee	CRM Email systems Electronic filing including online portal for Committee	CRM	CRM
<b>Retention</b>	5 years after completion of research covered by grant award or 2 years after grant rejected.	5 years after completion of research covered by grant award or 2 years after grant rejected.	5 years after completion of research covered by grant award or 2 years after grant rejected.	5 years after completion of research covered by grant award or 2 years after grant rejected.	5 years after completion of research covered by grant award or 2 years after grant rejected.
<b>Sharing</b>	Not shared except by consent if joint application or collaboration is recommended.	Not shared	Not shared	Contracted supplier for bank transfer.	Not shared

You are representing your organisation (most of this will not be considered personal data)

We hold the names and contact details of individuals acting in their capacity as representatives of their organisations, across the business. If this relates to interactions regarding our charitable purposes, the legal basis is article 6(1)(f) of the GDPR. If the interactions relate to suppliers, contracts, buildings management, IT services etc., the legal basis is article 6(1)(c) of the GDPR for any legal obligation or article 6(1)(f) because the processing is within our legitimate interests as a business.

Data type held:	Contact details	Communication preferences	Crohn's or Colitis interest	Financial Potential	Record of transactions	Relationships
<b>Requirement</b>	Mandatory	Mandatory for DM only	Optional	see below	Mandatory	Mandatory
<b>Purpose</b>	In order to maintain a mutually beneficial relationship	In order to send direct marketing communications of interest to your organisation	Target specific condition communications and event invitations	This would only be used for potential corporate donors or recipients	In order to provide continuity of relationship	Identify other potential partners in network eg IBD UK
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)a Consent for use for direct marketing	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)b Performance of a contract 6(1)f Legitimate interest	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM ?Email systems ?Spreadsheets for mailing	CRM	CRM	CRM	CRM	CRM
<b>Retention</b>	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact
<b>Sharing</b>	Not shared unless some form of joint event when data subject will be specifically informed	Not shared	Not shared	Not shared	Not shared	Shared between organisations with consent

You are a health or related professional (HCP) who provides us with advice

<b>Data type held:</b>	<b>Contact details</b>	<b>Communication preferences</b>	<b>Crohn's or Colitis interest</b>	<b>Specific skills</b>	<b>Record of transactions</b>	<b>Relationships</b>
<b>Requirement</b>	Mandatory	Mandatory for DM only	Optional	Optional	Mandatory	Mandatory
<b>Purpose</b>	To enable contact with HCP for the purpose of benefiting from their advice	In order to send direct marketing communications of interest to your organisation	Target specific condition communications and event invitations	Fully utilise skills and knowledge offered to the charity	In order to provide continuity of relationship	Identify other potential partners in network eg IBD UK
<b>Legal basis</b>	6(1)a Consent for use to advise charity	6(1)a Consent for use for direct marketing	6(1)a Consent for use for direct marketing	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)b Performance of a contract 6(1)f Legitimate interest	6(1)a Consent for use for collaborative working
<b>Storage</b>	CRM ?Email systems ?Spreadsheets for mailing	CRM	CRM	CRM	CRM	CRM
<b>Retention</b>	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact	5 years after last contact
<b>Sharing</b>	Not shared unless some form of joint event when data subject will be specifically informed	Not shared	Not shared	Not shared	Not shared	Shared between HCPs with consent

## You have become a subscribing member

Data type held:	Contact and membership	Communication preferences	Crohn's or Colitis sufferer	Date of birth/age	Financial Circumstances	Bank details	Record of transactions	Relationships
<b>Requirement</b>	Mandatory	Mandatory for DM only	Optional	Mandatory for children only	Mandatory for waiver only	Mandatory for DD only	Mandatory	Mandatory
<b>Purpose</b>	In order to communicate with you and maintain a register of members	In order to send direct marketing communications of interest to you	Target specific condition communications and event invitations. Establish credibility to speak for IBD patients	In order to communicate age appropriately	In order to waive subscriptions fees	To process membership subscription payments by Direct Debit	In order to provide continuity of service to the member and recognise commitment	To identify family memberships / carers of children etc. and communicate appropriately
<b>Legal basis</b>	6(1)c Company law relating to register of members 6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)a Consent for use as a member	6(1)a Consent for use as a member	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM Email systems Temp storage in spreadsheet for mailing then deleted	CRM	CRM	CRM	CRM	CRM Temp storage in spreadsheet for uploading then deleted	CRM	CRM
<b>Retention</b>	10 years after resigning membership	5 years after resigning membership	5 years after resigning membership	5 years after resigning membership	5 years after resigning membership	5 years after resigning membership	5 years after resigning membership	5 years after resigning membership
<b>Sharing</b>	With contracted suppliers for mailings/e-newsletters. On request for Register of Members.	Not shared	Not shared	Not shared	Not shared	Contracted suppliers for processing payments	Not shared	Not shared

Please note that Trustee and Board Committee members' data is held with a contracted supplier on an online portal based in the USA.

## You have offered to volunteer for us

Data type held:	Contact details	Communication preferences	Crohn's or Colitis sufferer	Date of birth/age	Financial Circumstances	Bank details	Record of transactions	Relationships
<b>Requirement</b>	Mandatory	Mandatory for DM only	Optional	Mandatory for children only	Mandatory for waiver only	Mandatory for DD only	Mandatory	Mandatory
<b>Purpose</b>	In order to communicate with the volunteer and inform them of volunteering opportunities	In order to send direct marketing communications of interest to the volunteer	Target specific condition communications and event invitations	In order to communicate age appropriately	In order to waive subscriptions fees	To process membership subscription payments by Direct Debit	In order to provide continuity of support to the volunteer and recognise commitment	To identify family memberships / carers of children etc. and communicate appropriately
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)a Consent for use for direct marketing	6(1)a Consent for use as a volunteer	6(1)a Consent for use as a member	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM ?Email systems ?Spreadsheets for mailing	CRM	CRM	CRM	CRM	CRM Temp storage in spreadsheet for uploading then deleted	CRM	CRM
<b>Retention</b>	5 years after ceasing to volunteer	5 years after ceasing to volunteer	5 years after ceasing to volunteer	5 years after ceasing to volunteer	5 years after ceasing to volunteer	5 years after ceasing to volunteer	5 years after ceasing to volunteer	5 years after ceasing to volunteer
<b>Sharing</b>	With contracted suppliers for mailings/e-newsletters.	Not shared	Not shared	Not shared	Not shared	Contracted supplier for processing payments	Not shared	Not shared

## You have applied for a job or secondment with us

Data type held:	Application details	Employment details	Health conditions	Certification etc	Criminal checks	Bank, pay and pensions	Job performance	Learning & development	Leaving details
Requirement	Mandatory	Mandatory	Optional	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
<b>Purpose</b>	Fair shortlisting of candidates and personal data for those recruited	Accurate recording of contract terms	Ensure safe and appropriate interview and working environment	Ensure right to work in UK and undertake driving etc.	Check suitability to work with vulnerable people if necessary for the role	Required to pay employee as agreed and fairly	Target specific condition communications and event invitations	Ensure staff able to meet legal obligations and create the best staff for the charity.	Demonstrate compliance with contract and legal obligations.
<b>Legal basis</b>	6(1)b Performance of a contract 6(1)c Legal obligation	6(1)b Performance of a contract 6(1)c Legal obligation	6(1)a Consent for use for wellbeing 6(1)c Legal obligation (Equal opps)	6(1)c Legal obligation	6(1)c Legal obligation	6(1)b Performance of a contract 6(1)c Legal obligation	6(1)b Performance of a contract 6(1)f Legitimate interest	6(1)c Legal obligation 6(1)f Legitimate interest for charitable purposes	6(1)b Performance of a contract 6(1)c Legal obligation
<b>Storage</b>	Secure cabinet Online in restricted area ?Email systems	Secure cabinet PeopleHR ?Email systems	Secure cabinet	Secure cabinet	DBS check is not stored, but a record of any risk assessment is kept in a password protected document on the secure drive for up to six years after leaving.	PeopleHR Sage	Secure cabinet HR Director local drives HR Assistant email folders Personal files on the HR Drive	CRM	Secure cabinet PeopleHR
<b>Retention</b>	6 months* if unsuccessful/ 6 years after leaving if successful	6 years after leaving	6 years after leaving	6 years after leaving	6 years after leaving Self declarations for unsuccessful candidates are kept for six months	6 years after leaving	6 years after leaving	6 years after leaving	6 years after leaving
<b>Sharing</b>	Shared with online recruitment sources Shared with previous employers or others provided by you for reference purposes	May be shared with contracted supplier for advice	May be shared with contracted supplier for advice	Not shared unless advice required on right to work in the UK.	Shared with Hertfordshire County Council for online DBS processing only	Contracted supplier for payment systems. HMRC for tax/NI Any employee nominated recipient e.g. Pension providers. Any other Government service who may require payment e.g. child support etc.	May be shared with contracted supplier for advice and legal representatives if dispute	Not shared	HMRC EAT (if applicable) and legal representative Dates with potential future employers

\* This may be extended to 9 months if [you have asked](#) us to keep your details on file for consideration against other opportunities

NB No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

You have had your photograph taken by us

<b>Data type held:</b>	<b>Contact details</b>	<b>Image</b>	<b>Crohn's or Colitis sufferer</b>	<b>Date of birth/age</b>	<b>Record of transactions</b>	<b>Relationships</b>
<b>Requirement</b>	Mandatory/Optional *	Mandatory	Optional	Mandatory for children only	Mandatory	Mandatory for children only
<b>Purpose</b>	To access on further usage permissions	To promote the organisation and make marketing and services more accessible.	Target specific condition communications	In order to communicate age appropriately	In order to record permissions and usage of image	To identify family / carers of children etc. and communicate appropriately
<b>Legal basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes
<b>Storage</b>	CRM Email systems Spreadsheets for mailing	Potentially: CRM; website; internal files; email systems; social media; and publications	Potentially: CRM; website; internal files; email systems; social media; and publications	CRM	CRM	CRM
<b>Retention</b>	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact
<b>Sharing</b>	Not shared	Not shared	Not shared	Not shared	Not shared	Not shared

\* Whether this is mandatory or optional depends on the type of image and its usage. People captured in a large group at a fundraising event would not necessarily require to give consent to use the image although we would do our best to exclude anyone who did not wish to be photographed. Images used alongside a case study of that person would need consent from that individual based on full disclosure of how it will be used and what will be said in that context.

You have joined our Patients' Voices Network

Data type held:	Contact details	Diagnosis & date	Date of birth/age	Record of interactions	Postcode	Language	Disability	Gender	Sexual orientation	Ethnicity	Religion	Relationships	Employment status / Financial status
<b>Requirement</b>	Mandatory	Optional	Mandatory for children only	Mandatory	Mandatory	Optional	Optional	Optional	Optional	Optional	Optional	Optional	Optional
<b>Purpose</b>	In order to provide opportunity details and gather feedback	To send/target specific condition related opportunities	In order to communicate age appropriately	In order to provide continuity of service	To send only local opportunities	To ensure we are making all opportunities accessible	To recognise and learn from the different perspectives of those who engage with us and ensure credibility to speak for all IBD patients				To identify family member /carers of children etc. and communicate appropriately	This would be used to target opportunities benefiting low income groups	
<b>Legal Basis</b>	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes				6(1)f Legitimate interest in pursuit of charitable purposes	6(1)f Legitimate interest in pursuit of charitable purposes	
<b>Storage</b>	CRM Email systems Spreadsheets for mailing	CRM	CRM	CRM	CRM	CRM	CRM	CRM	CRM	CRM	CRM	CRM	CRM
<b>Retention</b>	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact	2 years after last contact						
<b>Sharing</b>	Not shared unless joint opportunity	Not shared	Not shared	Not shared	Not shared	Not shared	Not shared	Not shared					

For more information on your rights, please see [‘Your rights as an individual’](#)

## Appendices

A Extract of Privacy notice for job applicants

B Employee privacy notice

# Privacy Notice for Job Applicants

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as prospective employees of our organisation, of the types of data we process about you.

We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

## A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

## B) TYPES OF DATA HELD

We keep several categories of personal data on our prospective employees in order to carry out effective and efficient processes. We keep this data in recruitment files relating to each vacancy which hold within our computer systems, for example, recruitment logs.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers;
- b) your gender, marital status, information of any disability you have or other medical information;
- c) right to work documentation;
- d) information on your race and religion for equality monitoring purposes;
- e) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter;
- f) references from former employers;
- g) details on your education and employment history etc.;
- h) criminal convictions.

## C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the recruitment process.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers and the Disclosure and Barring Service.

Should you be successful in your job application, we will gather further information from you once your employment begins, for example, your bank details and next of kin details.

## D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the UK	Legal obligation

Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Making decisions about contractual benefits to provide to you	Our legitimate interests
Assessing training needs	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests

## E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

## F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment or administer contractual benefits.

## G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of legal obligation to process this data.

## H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility have been trained to ensuring data is processed in line with data protection regulations and GDPR.

We may also share your data with third parties to comply with a legal or contractual obligation. We have a data processing agreement in place with such third parties to safeguard data. Third parties must implement

appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

#### I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

#### J) RETENTION PERIODS

We only keep your data for as long as we need it for, which, in relation to unsuccessful candidates, is six months.

If your application is not successful and we have not sought consent, or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for six months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for nine months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent in which case it will be deleted.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you on joining.

#### K) AUTOMATED DECISION MAKING

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

#### L) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact [HR@crohnsandcolitis.org.uk](mailto:HR@crohnsandcolitis.org.uk)

#### M) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

## N) DATA PROTECTION COMPLIANCE

Our responsible lead for Data Protection is:

Andrew Adie  
Director of Finance and Corporate Services  
01727 830038

**Our Values:** We work with shared values of Ambitious, Compassionate and Stronger Together. In the application of our policy, we will seek to ensure that we live our values. In doing so, we will balance the needs of the organisation with doing the right thing by our people.



# Privacy Notice for Employees

Crohn's & Colitis UK collects and processes personal data relating to our employees in order to manage the employment relationship. We are committed to being transparent about how we collect and use personal data and to meeting our data protection obligations.

## 1. What information does the organisation collect?

The organisation collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The organisation collects this information in a variety of ways. For example, data is collected through application forms, CVs; obtained from your passport or other identity documents such as your driving licence; from forms (either paper based or more recently, online (PeopleHR) completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases and with your consent, the organisation collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

## 2. Where is the information stored?

Data is stored in a range of different places, including in your personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

### 3. Why does the organisation process personal data?

The organisation needs to process data to enter into an employment contract with you and to meet its obligations of that contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the organisation has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the organisation to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the organisation uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time.

Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

The organisation does not currently base employment *decisions on automated decision-making*.

#### 4. Who has access to data?

Your information will be shared internally, including with members of the HR team (including payroll), your line manager, managers in the business area in which you work *and IT staff if access to the data is necessary for performance of their roles*.

The organisation shares your data with third parties in order to obtain pre-employment references from other employers, and obtain necessary criminal records checks from the Disclosure and Barring Service where necessary for a role.

The organisation also shares your data with third parties that process data on its behalf, *in connection with payroll*, the provision of benefits and the provision of occupational health services.

Organisation	Service	Legal reason for Processing
Peninsula	HR employment law advice and guidance	Performance of the contract
Legal and General	Pension Provision	Performance of the contract
HRMC	Deductions of tax and NI contributions / reporting of earnings	Legal Obligation
People HR	Online People HR Platform	Performance of the contract
Sage HR	Online Payroll System	Performance of the contract
Business Fraud and Prevention Partnership	Online Learning – GDPR and Data Protection	Legal Obligation
Hertfordshire County Council	DBS processing	Legal Obligation

Where the organisation engages third parties to process personal data on our behalf, the organisation will make every effort to keep your data safe. We will achieve this on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

The organisation will not transfer your data to countries outside the European Economic Area.

#### 5. How does the organisation protect data?

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. The following policies are in place to protect your data:

- Data Protection Policy
- Acceptable ICT Use Policy
- Access Control Policy
- Public Interest Disclosure (Whistleblowing) Policy

All HR information is held in restricted files, accessible by HR employees, selected members of finance (payroll data only) and the Chief Executive (on a needs driven basis) only.

Data is only held for the periods of time outlined below.

## 6. For how long does the organisation keep data?

The organisation will hold your personal data for the duration of your employment plus an additional six years. There is a clear destruction of records procedure which outlines what we will destroy and when. We also have clear parameters for the processing and storing of information relating to criminal records and rehabilitation of offenders which are aligned to Code of Practice for the Disclosure and Barring Service.

## 7. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact your line manager. If you have any concerns about how your request has been dealt with or other aspects of data protection practice in the organisation please contact our Data Protection Compliance Lead as described in the Data Protection Policy.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

## 8. What if you do not provide personal data?

You have some obligations under your employment contract to provide the organisation with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith.

You may also have to provide the organisation with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the organisation to enter a contract of employment with you. If you do not

provide this information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

#### **9. How will this evolve over time?**

We will ensure that when we ask for additional information, we will make clear the legal rationale for processing this data. We will also make clear where the provision of the information is consensual and how you can remove this consent at any time.