

# PRIVACY POLICY

Last updated: May 2018

## **SPEED READ: THIS IS WHAT YOU NEED TO KNOW**

We always recommend that our volunteers, referral partners and other interested parties read this privacy policy in full. It explains who we are, how and why we collect personal data from you, how and why it will be processed by us and our commitment to protecting your data.

But just in case you do not have time to read it in full we have summarised the key points for you in our 'speed read' section below.

- Baby Bank Network (**BBN, we, our or us**) is a registered charity with registered charity number 1165381.
- We take our approach to data protection and protecting your privacy seriously. You can contact us at [info@babybanknetwork.com](mailto:info@babybanknetwork.com) with any related queries.
- We process (i.e. handle) your personal data to provide our services to you and our beneficiaries. Under data protection laws, we are only permitted to process your personal data where we have a legal basis for doing so. We will only ever process your personal data in compliance with applicable law.
- We may share your personal data with our third party suppliers, including our referral partners and delivery fulfilment agents, to enable the efficient and secure provision of services to you and our beneficiaries. Except as explained in this privacy policy, we will not share your data with third parties without your consent unless required to do so by law.
- We will keep your data for as long as we provide services to you. We will then keep data for 6 months from the date of our last interaction to deal with any queries.
- We may transfer your data to a recipient located outside of the European Economic Area (**EEA**). If we do this, we will ensure that the transfer mechanism provides an adequate level of protection, which has been recognised by the European Commission.
- You have important rights under laws aimed at protecting your personal data. This policy sets out your rights and how can you exercise them. For more information, click here [\[what are your rights?\]](#). You also have the right to make a complaint to the Information Commissioner's Office if you are unhappy with how we have handled your personal data. For more information click here [\[who can you ask for more information?\]](#)

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## **1 ABOUT BABY BANK NETWORK**

This privacy policy sets out how we collect, use and protect the personal data that you provide to us. It also explains what we do with your data. We also set out details about your rights in relation to the personal data we hold about you, and how to contact us if you have any questions or comments.

Baby Bank Network (**BBN, we, our or us**) is a registered charitable incorporated organisation with registered number 1165381. We are not registered with the Information Commissioner as we fall within the exemption for not for profit organisations.

## **2 ABOUT THIS PRIVACY POLICY**

This privacy policy applies to the personal data we collect about you through our website ([www.babybanknetwork.com](http://www.babybanknetwork.com)) (**Website**), by post, by telephone and when you otherwise communicate with us (**Communicate**).

This privacy policy may change from time to time and, if it does, the up-to-date version will always be available on our Website. We will also tell you about any important changes to our privacy policy.

## **3 WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?**

This section informs you of what information we collect about you and why.

We collect personal data about you if you fill in forms on the Website or correspond with us by phone, email or otherwise. This includes information you provide when you register to volunteer with us through the website or by email, enquire about becoming a referral partner and when you report a problem with our Website.

### **Personal data we process:**

- name(s)
- home address and telephone number
- personal email address
- next of kin (name, relationship and phone number)
- IP address
- No automated decision-making or profiling will take place using your personal data.

### **If you use our Website:**

If you use our Website, we automatically collect the following information:

- web usage information (e.g. IP address), your login information, browser type and version, time zone setting, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through and from our Website (including date and time); time on page, page response times and download errors.

Where we collect information about you in the ways described above, we do so on the basis that it is in our legitimate interests to collect and process this data. In most situations this will be

anonymised but we collect and process this data to ensure that our Website is functioning properly and that our customer experience is to the standard that you and we expect.

The Website may, from time to time, contain links to and from the websites of advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

We also use cookies on our Website. Please see this section [\[COOKIES\]](#) for more information.

**Information we receive from other sources:**

When we receive information from other sources, we rely on them having the appropriate provisions in place telling you how they collect data and who they may share it with. We carefully check our sources to ensure that we only receive your information when it is lawful for us to do so.

**4 HOW WILL WE USE YOUR PERSONAL DATA**

This section explains how we will collect, store and use personal data you provide to us in order to carry out the activities relevant to the provision of our services to you and our beneficiaries.

We use the information held about you in the following ways:

- **Information you give to us.** We will use this information to:
  - respond to your inquiries or to process your requests in relation to your information;
  - keep you up to date in connection with our services and our organisation more generally;
  - provide our services generally;
  - administer records of our referral partners and volunteers;
  - carry out market research campaigns;
  - provide you, or permit selected third parties that you have consented to provide you, with information about goods or services we feel may interest you; or
  - ensure that content from our Website is presented in the most effective manner for you and for your computer, making the Website easier for you to use and providing you with access to all parts of the Website.
- **Information we collect about you.** We will use this information:
  - to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our Website to ensure that content is presented in the most effective manner for you and for your computer; or
  - as part of our efforts to keep our Website safe and secure;

We must have a legal basis for processing your personal data. We consider that we have a legal basis where:

- you have given us consent to do so for the specific purposes which we have told you about – for example, we will generally need your consent to send any communications to you;
- it is necessary for us to do so to enable us to provide you with the services that you have requested from us - for example, contacting you about orders;
- it is necessary in order to fulfil our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- the law otherwise permits or requires it.
- Where we process your personal data on the basis of our legitimate interests, these are our (or our third party's) interests in providing our services to you and our beneficiaries in an efficient and secure manner.

## **5 COMMUNICATIONS**

This section is to explain how we will ensure that you only receive communications that you wish to receive.

We want to ensure that you are fully informed and aware of our organisation, our services, promotions and events. By consenting to receive additional communications (by mail, telephone, SMS, text/picture/video message or email) from us in respect of such information, we will process your personal data in accordance with this privacy policy.

If you prefer not to receive any communications from us, you can change your preferences and unsubscribe at any time by contacting us at [info@babybanknetwork.com](mailto:info@babybanknetwork.com). If you choose not to receive this information we will be unable to keep you informed about our organisation, our services, promotions and events.

## **6 WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA**

This section is to explain who, within BBN, will have access to your data. Your personal data will only be seen or used by our volunteers and employees who have a legitimate business need to access your personal data for the purposes set out in this privacy policy.

We take your privacy seriously and have implemented appropriate physical, technical and organisational security measures designed to secure your personal data against accidental loss, destruction or damage and unauthorised access, use, alteration or disclosure.

## **7 WHO ELSE MIGHT WE SHARE YOUR PERSONAL DATA WITH**

This section will inform you of who we share your personal data with and why. Except as explained in this privacy policy, we will not share your personal data without your consent unless required to do so by law.

We may share your personal data with the following third-party service providers who assist us with administering the provision of our services to you and our beneficiaries:

- Business/charity partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- agents we engage to perform functions on our behalf including fulfilling order deliveries, sending communications, analysing data, providing marketing assistance, processing

payments and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes; and

- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We may also pass aggregate information on the usage of our Website (e.g. we might disclose the numbers of visitors to our Website that come from different geographic areas) to third parties but this will not include information that can be used to identify you personally.

## **8 HOW DO WE PROTECT YOUR PERSONAL DATA?**

This section explains how we keep your personal data safe and where it will be held.

We take your privacy seriously and are committed to maintaining the privacy and security of the personal data you provide to us, and the choices you have regarding our collection and use of your personal data.

We follow strict security procedures as to how your personal data is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. You should not share this information with anyone.

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). By submitting your information, you agree to such transfer, storing or processing as further detailed.

Where your personal data is transferred from the EEA to a recipient outside the EEA in a country not recognised by the European Commission as providing an adequate level of protection for personal data, such transfer shall be covered by a framework recognised by the relevant authorities or courts as providing an adequate level of protection for personal data including but not limited to:

- Standard Contractual Clauses (the agreement in the form annexed to the European Commission's decision of 5 February 2010 on Standard Contractual Clauses for the transfer of personal data to processors established in third countries which can be found [here](#)); or
- The EU-US Privacy Shield Framework.

Unfortunately, the transmission of your personal data via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us over the internet and you acknowledge that any transmission is at your own risk.

## **9 HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

This section explains the length of time that we will retain your personal data.

We will keep your personal data for no longer than necessary, for the purposes we have set out above. We will retain your information for as long as needed in order to provide the relevant services to you and our beneficiaries or perform any contract we have with you and for a period of 6 months from the date of our last interaction in order to deal with any queries or complaints.

Any third parties that we engage will keep your data stored on their systems for as long as is necessary to provide the relevant services to you or us. If we end our relationship with any third party providers, we will make sure that they securely delete or return your personal data to us.

We may retain personal data about you for statistical purposes (for example, to help us better advertise our services). Where data is retained for statistical purposes it will always be anonymised, meaning that you will not be identifiable from that data.

## **10 WHAT ARE YOUR RIGHTS?**

This section explains that you have a number of rights in relation to your personal data. There are circumstances in which your rights may not apply. You have the right to request that we:

- provide you with a copy of the information we hold about you;
- update any of your personal information if it is inaccurate or out of date;
- delete the personal data we hold about you - if we are providing services to you and you ask us to delete personal data we hold about you then we may be unable to continue providing those services to you;
- restrict the way in which we process your personal data;
- stop processing your data if you have valid objections to such processing; and
- transfer your personal data to a third party.

For more information on your rights and how to use them, or if you would like to make any of the requests set out above, please contact us using the details provided in this section [[who can you ask for more information?](#)]. We will respond to all such requests within the time period required by law.

As explained in the section on Communications above, even if you consented to the processing of your personal data for communication purposes (by ticking the relevant box or by requesting information about services), you have the right to ask us to stop processing your personal data for such purposes. You can exercise this right at any time by contacting us at [info@babybanknetwork.com](mailto:info@babybanknetwork.com).

## **11 COOKIES**

This section explains how the Website uses cookies. Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website.

Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies in themselves do not identify you, just the computer or device you are using. Cookies do lots of different jobs, like making it easier for you to log on to and use our Website during future visits, letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They also allow us to monitor traffic on our Website and can also help to ensure that adverts you see online are more relevant to you and your interests.

Cookies themselves only record which areas of our Website have been visited by your computer or device and for how long. Allowing us to create a cookie does not give us access to the rest of your computer.

We use third party cookies. These are cookies that exist on our Website but originate from different domains. Below are the third party cookies we use and why:

- **WooCommerce cookies:** To keep track of cart data we use two cookies: woocommerce\_cart\_hash and woocommerce\_items\_in\_cart. These cookies contain information about the cart as a hold and helps us know when the cart data changes. We also use wp\_woocommerce\_session\_ which contains a unique code for each customer so that it knows where to find the card data in the database for each customer. No personal data is stored within these cookies.
- **YouTube persistent cookies:** YouTube is used by the Website to store and show video content. The following cookies are set by YouTube to track usage of its services, your preferences, your bandwidth to determine which interface you receive a and are only installed when you press play: VISITOR\_INFO1\_LIVE; CONSENT; PREF; and YSC.
- **NID cookies:** These cookies are used by Google for Google Maps preferences

With most Internet browsers, you can erase or block cookies or ask to receive a warning before a cookie is stored. The “Help” function within your browser should tell you how. Alternatively, you may wish to visit [www.youronlinechoices.eu](http://www.youronlinechoices.eu) which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies.

Please be aware that restricting cookies may have a negative impact on the functionality of the Website.

## 12 WHO CAN YOU ASK FOR MORE INFORMATION?

If you have any questions or concerns about how we handle your personal data, you can contact us using any one (or more) of the following:

Post: Ground Floor, Unit 5, Stoke View Business Park Bristol BS16 3AE

Email: [info@babybanknetwork.com](mailto:info@babybanknetwork.com)

Telephone number: 0117 3293160

If you are unsatisfied with our response to any data protection issues you raise with us or our DPO, you have the right to make a complaint to the [Information Commissioner's Office](https://ico.org.uk/) (ICO). The ICO is the authority in the UK which is tasked with the protection of personal data and privacy.