



# KIN Privacy Policy

Privacy policy last updated 11 December 2020

## 1. Purpose of this policy

Kinfolk Network CIC (“KIN”, “we”, “us” or “our”) takes the protection of your personal data seriously. This Privacy Policy explains how we use any personal information that you supply to us, or that might be collected from a third party, and sets out your rights in respect of our processing of your personal information.

This policy is divided into 15 sections - including this one - under the sub-headings outlined below.

1. **Purpose of this policy** - that’s this section
2. **About us** - how we are registered, where you can find us
3. **How we collect your personal information** - 4 ways we could end up with data on you
4. **What information we collect** - the kinds of information we collect
5. **How and why we use your personal data** - e.g. staying in touch, marketing etc.
6. **Lawful processing** - which laws allow us to process which pieces of information
7. **Children’s data** - our policy on the data of people under the age of 18
8. **Other disclosures** - cases where it would be necessary to disclose your information
9. **Security of & access to your personal data** - how we keep data secure, who can access it
10. **Your rights** - your legal rights on the usage of your data
11. **Data retention** - why and when we keep or remove your data
12. **Policy amendments** - how why and when we would and will change this policy
13. **Third party websites** - on privacy policies on websites you may link to through ours
14. **Updating information** - how to update the information we have on you
15. **Contact** - how to contact us

You provide your personal data to us on a voluntary basis. But without providing us with your personal data, you will be unable to (as appropriate) receive our regular update and events emails, join our member networks, make a donation or apply for employment with us.

This Privacy Policy is intended to assist you in making informed decisions about your personal data. Please take a moment to read and understand it.



If you have any queries or concerns whatsoever about the way in which your data is being processed, or want to exercise your privacy rights, by opting out of specific data usages please contact us by sending an email to [kinfolknetwork@gmail.com](mailto:kinfolknetwork@gmail.com).

We may update this Policy from time to time without notice to you, so please check it regularly.

## **2. About us**

Kinfolk Network CIC is a community interested company limited by guarantee. Our principal activities include facilitating a network of black organisers and campaigners to connect, build and heal together.

KIN is the data controller responsible for your personal information. We are registered in England and Wales under company number 12914729. Our registered address is Oxford House, Derbyshire Street, London, E2 6HG.

## **3. How we collect your personal information**

We may collect your personal information in the following ways:

### **(1) When you give it to us DIRECTLY**

You may give us your personal data in various ways, including when you apply to join our network, opt-in to receive our update emails, when you apply to participate in our trainings, when you apply for employment with us, when you apply to volunteer with us, when you share information about our work on Facebook, Twitter and/or via email, when you contact us by phone, email or post, and/or when you donate money to us.

### **(2) When you give it to us INDIRECTLY**

Your information may be shared with us by others including our strategic partners, network members, business contacts, sponsors and supporters of our organisation and services. Your information will also be provided to us when you follow us or otherwise interact with on or via Twitter, when you like and/or join our page on Facebook or interact with us in other ways on or via Facebook.

### **(3) When you give permission to OTHER ORGANISATIONS to share it or it is AVAILABLE PUBLICLY**

We may combine information you provide to us with information available from external publicly available sources. Depending on your privacy settings for social media services, we may also access information from those accounts or services. We use this information to gain a better understanding of our audience and to improve our communications, network facilitation, training and fundraising activities.

### **(4) When you visit our WEBSITE**



We use cookies to identify you when you visit our website and to enable us to personalise your online experience (for example by remembering your log in details). Please refer to section 6 for details on the way our use of cookies affects your personal data

#### **4. What information do we collect?**

We may collect, store and use the following kinds of personal data:

- your name and contact details, including physical address, telephone number and e-mail address, and social media identity
- financial information, such as payment-related information, including bank details or debit/credit card details
- the information you add to your profile as a member of our networking platform, including your affiliation(s) and position(s) held in social movement organisations, and the posts you make on our discussion boards or lists including '+1s' and 'likes' of others' posts.
- other personal information we receive in the course of providing services to you, including details of why you have decided to contact us/apply to one of our training courses, details of trainings you have attended and your contributions during training sessions, details of topics/areas of interest to you, responses to surveys you have completed, equal opportunities monitoring information and information about any health and disability-related requirements
- technical information, including information about your visits to and use of our Site and the device you used to access the Site, your IP address, geographical location, browser type, referral source, length of visit and number of page views
- marketing information, including information about the services you use, services and products of interest to you or any marketing and/or communication preferences you give; and/or any other information shared with us as per paragraph 1 above.
- Do we process special categories of personal information?

Applicable law recognises certain categories of personal information as sensitive and therefore requiring more protection, including health information [clomidonlinepct.com](http://clomidonlinepct.com), ethnicity, trade union membership, religious beliefs, sexuality, and political opinions. We collect this type of data in the following circumstances:

- for our convening applicants and network members, to monitor equal opportunities and the accessibility of our services;
- to ensure our provision is sensitive to health needs of participants;
- in the interests of positive action / anti-oppression, where we're running opportunities e.g. events with limited places, if several candidates match our criteria equally, we may use this data to prioritise applications from members of underrepresented groups;
- where you voluntarily share information about your political views or your trade union membership as a network member, which we use to understand your interests and ensure we are providing appropriate and relevant services.



- In other limited cases, we may collect sensitive personal data about you. We only collect sensitive personal data if there is a clear reason for doing so; and only do so with your explicit consent.

## **5. How and why will we use your personal data?**

We may use your personal information to:

- Manage and administer our relationship with you, including providing you with services (such as enabling participation in our network and programmes), products and information you have requested,
- Market our services, including sending you information about our programmes, events, training, and any other information, products or services that we provide. We may do this by using marketing tools, such as Facebook marketing and by using personalisation to tailor and enhance your experience of our communications;
- Administer our Site, including monitoring its use;
- Administer payments;
- Administer applications to our training courses;
- Administer your employment and/or volunteering application;
- Carry out operational management of the organisation, including employee and volunteer recording and monitoring for safety, performance management or workforce planning purposes; provision and administration of staff pay and benefits; physical security, IT and network security; processing for historical, scientific or statistical purposes;
- Conduct research and data analysis into the impact of our work, including using analytics tools such as Google Analytics;
- Deal with enquiries and complaints made by or about you relating to the Site or us in general;
- Deliver or administer programmes, products, and information;
- To carry out financial management and controls, including processing financial transactions and maintain financial controls; prevent fraud, misuse of services and money laundering; enforce legal claims; and report criminal acts and comply with law enforcement agencies;
- Audit and/or administer our financial accounts and conduct other statutory reporting and regulatory compliance;
- Maintain a membership database and suppression lists;
- Conduct member and supporter research;
- Meet any other of our legal, regulatory and risk management obligations.
- Using our services

If you apply to join our network or participate in one of our training courses or events, then we will process your personal information in order to provide that service to you and to monitor the effectiveness and reach of our services as described above.



We may use Google Forms and Google Sheets to process your applications for our programmes. You can check Google's Privacy Policy here: <https://policies.google.com/privacy?hl=en>

### **Supporter research**

We may use your personal information to undertake research to gather further information about you from publicly accessible sources (as per clause 1 above). This helps us to get a better understanding of your background, interests and preferences in order to improve our communications and/or interactions with you, to help ensure they are targeted to be relevant and appropriate, and to provide information (sometimes through third parties) about programmes and other aspects of our work which we consider may be of interest to you.

### **Marketing**

#### Marketing methods

Where you have provided us with your physical address and appropriate consent, we may contact you by post. Where you have provided appropriate consent, we may also contact you by telephone and e-mail, with targeted communications to let you know about our events and/or activities that we consider may be of particular interest, about the work of the company and to ask for donations or other support.

#### Facebook marketing

We may use some of your personal information to participate in Facebook's Custom Audience and Lookalike Audience programs, which enable us to display adverts to both existing and prospective supporters when they visit Facebook. We may provide your email address to Facebook so they can determine whether you are a registered account holder with them. Our adverts may then appear when you access Facebook. Some of your data is sent in an encrypted format that is deleted by Facebook (a) if it does not match with a Facebook account or (b) after they confirm you are a registered account holder.

For more detailed information please see

<https://www.facebook.com/business/help/744354708981227> and Facebook's data policy at <https://en-gb.facebook.com/policy.php>.

### **Using our Site**

When you use our Site, you may be asked to provide us with personal information. When you provide us with personal information in this way, we only use it for the purposes stated to you at the time we collect that information.

We also use cookies on our Site. For example, we may use Google Analytics to review some of your personal information, in order to analyse our digital performance, for example to see how



our Site can be improved to help us achieve the purposes set out in section 6 below, to record how you are using our Site, or to assess the popularity of marketing campaigns. You can opt-out of the collection of information for such purposes here: <http://www.aboutads.info/choices>

## **6. Lawful processing**

We are required to have one or more lawful grounds to process your personal information. We use your personal information on the following bases:

- Personal information is processed on the basis of a data subject's consent
- Personal information is processed on the basis of a contractual relationship
- Personal information is processed on the basis of legal obligations
- Personal information is processed on the basis of legitimate interests

### **(1) Consent**

We will ask for your consent to use your information to send you postal or electronic communications such as newsletters and marketing and fundraising emails, for targeted advertising and profiling, to hold a profile of your information on our online member platform and if you ever share sensitive personal information with us.

### **(2) Contractual relationships**

Most of our interactions with members and website users are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us, or if you purchase something from us.

### **(3) Legal obligations**

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

### **(4) Legitimate interests**

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for consent.

When we use your personal information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair in other ways.

## **7. Children's data**



Our services are not aimed at children and we require people to declare themselves to be 18 or over to become a member of our network or access our training courses. Hence we do not knowingly process data of any person under the age of 18. If we come to discover, or have reason to believe, that you are under 18 and we are holding your personal information, we will delete that information within a reasonable period and withhold our services accordingly.

## **8. Other disclosures**

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we will disclose your information to regulatory and/or government bodies and/or law enforcement agencies upon request only when absolutely necessary to do so in order to satisfy legal obligations which are binding on us.

## **9. Security of and access to your personal data**

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure or of access to your personal information.

Your information is only accessible by appropriately trained staff, contractors and volunteers, apart from information you voluntarily share on our members' platform.

We may also use agencies and/or suppliers to process data on our behalf. We may also merge or partner with other organisations and in so doing transfer and/or acquire personal data.

Please note that some countries outside of the EEA have a lower standard of protection for personal data, including lower security requirements and fewer rights for individuals. We may transfer and/or store personal data collected from you to and/or at a destination outside the European Economic Area ("EEA"). Such personal data may be processed by agencies and/or suppliers operating outside the EEA. If we transfer and/or store your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your personal data.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with your informed consent.

## **10. Your rights**

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:



(1) Right to be informed – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.

(2) Right of access – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we will have 30 days to comply.

(3) Right of erasure – you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it.

(4) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.

(5) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.

(6) Right to data portability – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details in section 14 below. To unsubscribe from our email lists or remove your data from our members’ platform email [kinfolknetwork@gmail.com](mailto:kinfolknetwork@gmail.com) with your request.

Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we reserve the right to ask for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information on your rights as a data subject, please consult guidance from the Information Commissioner’s Office (“ICO”). –

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> – or please contact us using the details in section 14 below.

You are further entitled to make a complaint about us or the way we have processed your data to the ICO. For further information on how to exercise this right, please see the guidance at



<https://ico.org.uk/for-the-public/personal-information>. The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

## **11. Data retention**

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time.

In the event that you ask us to stop sending you direct marketing/fundraising/member/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

## **12. Policy amendments**

We keep this Privacy Policy under regular review and reserve the right to update it from time-to-time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of changes to our privacy policy by email.

## **13. Third party websites**

We link our website directly to other sites. This Privacy Policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

## **14. Updating information**

You can check the personal data we hold about you, and ask us to update it where necessary, by emailing us at [kinfolknetwork@gmail.com](mailto:kinfolknetwork@gmail.com).

## **15. Contact**

We are not required by law to have a “Data Protection Officer” – however compliance with data protection regulation is the responsibility of the Board of Trustees.

If you have any queries or concerns whatsoever about the way in which your data is being processed, or want to exercise your privacy rights, please contact us by sending an email to [kinfolknetwork@gmail.com](mailto:kinfolknetwork@gmail.com).