



# Jacari Data Privacy Policy

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## 1. Introduction

This policy covers Jacari (Charity Registration No:1177211) who operate with a headquarters at Jacari, The Unity Centre, 7 Unity Street. Bristol, BS1 5HH. Within this document 'we' and 'us' will refer to Jacari as denoted previously. In addition 'you' refers to anyone who provides us with their data, including volunteers, pupils, alumni and supporters.

Jacari processes Personally Identifiable Information (PII) as a "Data Processor" in addition to processing PII on our own behalf as the "Data Controller" so is registered with the Information Commissioner's Office (ICO).

This policy applies to the website under 'Jacari.org' parent domain and Jacari's database system. It explains how Jacari uses the information provided and the processes that are in effect to help safeguard privacy.

## **2. Privacy**

We operate an 'opt-in only' communication policy. This means that we will only send marketing communications to those that have explicitly stated that they are happy for us to do so.

Our marketing communications include information about our volunteering, tuition services, fundraising, charity development and other ways to stay involved with Jacari. If you want to receive such communications but have not opted in please contact us on info [info@jacari.org](mailto:info@jacari.org).

Before or at the time of collecting personal data, we will identify the purposes for which information is being collected ensuring it is both fair and lawful and making sure we only ask for the information that is required. We will then use this information to:

- Fulfil those purposes that we have specified, and for other compatible purposes that we have obtained your consent for or as required by law.
- Retain the personal information as long as necessary for the fulfilment of those purposes and as long as we have a legal obligation to do so.

We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorised access, disclosure, copying, use or modification.

Information about our data privacy policy and practices relating to the management of personal information will be made readily available.

We are committed to conducting our business in accordance with these principles to ensure that the confidentiality of personal information is protected and maintained.

## **3. Changes to this policy**

Jacari reserves the right to update this policy when it sees fit or changes how it uses the information being gathered. The latest version of this policy will be available to download from our website with the date of last revision present at the top of the document. We will do our best to ensure this is communicated across multiple channels and re-obtain consent for any new processing where required.

## **4. Disclosure of information to Third Parties**

Except as explained below, Jacari will not disclose, distribute or sell Personal Data to any other organisation without prior consent/contractual obligation unless we have a legal obligation or right to do so.

Jacari works closely with some third parties (for example, technical delivery services e.g. Mailchimp, and schools) in provision of its services. We will ensure that contracts and Data Processing Agreements are in place to ensure that if we are required to send your data, we send it securely to these third parties and that this is done in order to fulfil the consent given by you for use of your information.

If Jacari receives information from any third parties, this may be combined with information that Jacari or you have provided in order to obtain a better set of information that could be used with one of the purposes outlined above.

We might also share information you have provided with selected third parties to provide you with information on services that may be of interest or relevant to yourself. This information is only shared if you have given us permission to do so via a separate opt-in mechanism.

## 5. Overseas Transfers

By submitting or uploading information on our website forms you are agreeing to the storage, processing and possible transfer of this data. Jacari will ensure that data processing agreements and contracts are set up with data processors. In order to be fully compliant with the Global Data Protection Regulation (GDPR) we will try to keep data within the EEA through partnered organisations; if outside of these areas it will be done in accordance with the guidance from the Information Commissioner's Office (ICO).

## 6. Direct Data Provision - Personal Data we collect and process

There are many lawful reasons that mean that we can process (use) your personal information:

Legitimate Interest – this relates to any volunteering or tuition service you have subscribed to with Jacari. We therefore have a genuine and legitimate reason to contact you around these services and the consequential processing of your related data. None of your rights or freedoms will be harmed or overwritten by this reason. These Legitimate Interest reasons for collecting and processing your data are as follows:

- Analytics – We may aggregate or use on a personal level, customer analysis, profiling and Direct Marketing combining information from multiple sources; providing that it does not infringe on your rights or freedoms.
- Due Diligence – When subscribing, registering and volunteering with Jacari, we may need to conduct further investigations to ensure you are able to volunteer safely with Jacari or be provided with tuition by Jacari.
- Direct Marketing – We will contact you via Telephone, Text messaging, WhatsApp and Email if you have subscribed to our services for administration and research.
- Personalisation – We will personalise, enhance or improve our communications, products and services to our volunteers, supporters and beneficiaries for their benefit.
- Consent – for example, this would be additional marketing or passing details on to certain Third Parties.

Jacari may collect personal data to enable you to subscribe, register or volunteer with Jacari via online forms on our website which link to our secure database. If you have registered with Jacari, the personal data that is provided to us may include:

- Name
- Contact Details
- Gender
- Date of Birth
- Social Handles (Facebook, Twitter, LinkedIn or other)
- Other information as needed to sign up for volunteering / being tutored

The website might also collect personal data in the form of:

- Log files (including IP addresses, browser type and version time zone settings, browser plugins, operating system and platform)
- Website usage, how long users spend on the sites and what they click on, how many times and what they interact with.

You can update personal information supplied by emailing [info@jacari.org](mailto:info@jacari.org). Current volunteers can also update their personal information using our Volunteer Portal.

## 7. Third Party Organisations

You may have provided permission for Jacari or another company/organisation to share your data with third parties, including ourselves. This could have been when you consented by providing your data to these other organisations (e.g. schools) and would be in line with their privacy policies.

## 8. Publicly Available Information

This may include information found in places such as Companies House and information that has been published in articles/ newspapers and on social media. This information may be used to supplement information that Jacari currently holds or uses to identify or target prospects/currently known individuals for marketing for our goods or services.

## 9. Use of Information

Jacari may use your information to notify you about important functionality changes/alterations and updates on Policies in place and anything else that can be classed as “administration”, such as updates to this policy and the terms and conditions of the services we provide. The purposes for collation and processing personal information could be one or more of the following:

- Provision of the tutoring services and information.
- Administration of your “profile” including managing your relationship with Jacari in terms of your marketing and communication preferences.
- Recording your interactions and relationship with us; including using this information to help with service improvements.
- Updating you on new services on offer which may be supplementary (requiring an “opt-in”) for, non-service related updates, releases or system outages.
- Equal opportunities monitoring; this is primarily for staff, pupils and volunteers.
- Non-automated profiling (which has human intervention) – consisting of the following:
  - Segmenting – this is essentially using variables we hold in the database to classify you as a particular user or into a cohort of users; this can be defined as “generic profiling”
  - Social; accessing publicly available information from social network sites such as Facebook, LinkedIn and others to ascertain engagement with specific causes/interests/groups etc.
- Appending/cleansing to the data Jacari currently holds on you – consisting of the following:
  - New address details from available sources such as the National Change of Address database (Royal Mail); where you have agreed, we may use this address.
  - Consented telephone numbers from selected third parties; where you have agreed we may use this number.
  - Gone away or deceased flags from selected third parties.
  - Compliance or other legal requirements that have either come from an authoritative figure or legal representation. This may also include any reasonable steps to protect Jacari against any fraudulent, unauthorised or illegal activity.

We may also use the information submitted for performance monitoring and data analysis that will help us improve our websites and services. We may also request and use “user feedback” which will form from comments, queries or suggestions; this will be used to improve our services.

Jacari may contact you for marketing purposes which may include news, activities and developments and fundraising or as specified from the initial request or subsequent data gathering forms or from the preferences as outlined in your profile. You can opt in or out of these by emailing [info@jacari.org](mailto:info@jacari.org).

## 10. Your Rights and Raising Complaints

Minor requests for information might be dealt with “Informally” not requiring the completion of a subject access request; this will be down to the Data Protection Officer’s (DPO) judgement.

You have certain rights in relation to your personal data:

- The right to be informed – How data will be used through a fair processing notice/policies.

This basically means, we will be clear and transparent on what and how we will process data that you provide by ensuring we include this at every point of data collection.

- The right to rectification

You have the right to correct personal information if we possess inaccurate/out-dated data; this might encompass things such as a new postal or email address etc. Where possible we use publicly available sources to keep your records up to date; for example, the Post Office’s National Change of Address database and information provided to us by other organisations as described above.

- The right to erasure

You can request that your details are removed from all our systems and databases, which we will do our best to comply with, and instruct you of any reason why we have been unable to comply.

- The right to object/restrict data processing

You can request that we cease or do not begin to process your data.

- The right to object/restrict data processing for marketing purposes

You can request that we cease or do not begin to process your data for marketing purposes which would cover any ideal, aim or objective of Jacari in addition to us promoting our services. We will only contact you for marketing purposes if you have opted in

- The right to data portability

If you wish to access your data in an intelligible format we will provide it.

- The right to refuse automated profiling and decision making

If we are profiling your data that has all system driven logic and outcomes you can request that we cease or do not begin to do this.

- The right to access your information – (formally Subject Access Request).

If you would like to know how your data has been processed, then you can request a Subject Access Request. Jacari has one month (30 Calendar Days) to comply with the request for data upon proof of identification though depending on the request this might take longer in accordance with GDPR. All information provided by us will be supplied in an intelligible format; if you have a preferred format, please let us know and we will try to conform to that.

Through the forms and policies on our site we hope that you understand when we request information, how we use the data and what actions you can take. Remember by enacting some of these rights you may inadvertently cause a cancellation or restrictions in the volunteering or tutoring services that you are subscribed to.

The ICO governs all aspects of data protection within the UK and should you have any concerns or wish to raise a complaint that Jacari is unable to resolve in the first instance; then please visit the following URL for more information: <https://ico.org.uk/> They also have a plethora of information around your rights and Data Protection.

## 11. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, all staff have an obligation to report such actual and potential data protection compliance failures to the Director, who shall investigate the breach.

Breaches must be reported to the individuals affected and the Chair of Trustees. The Director will report it to the ICO when necessary. This will take place within 72 hours of a personal data breach being found and where there is likely to be a risk to people's rights and freedoms as a result of the breach. A log of data protection compliance failures will be kept. When reporting such a breach, the GDPR requires that the following information is provided:

- a description of the nature of the personal data breach including, where possible:
  - the categories and approximate number of individuals concerned
  - the categories and approximate number of personal data records concerned
  - The name and contact details of the data protection officer
  - A description of the likely consequences of the personal data breach
  - A description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

More information on this procedure may be found on the [ICO website](#).

## 12. Links to Third Party Sites

On occasion, we may link to other sites that we have either partnered with or feel act as a useful reference point for additional information. These links may also be provided by other users of our "resources" pages. It is important to note that we do not endorse or recommend these links provided by third parties.

It is important in any circumstance before providing any information to any Third Party websites that you check their own privacy policies. Jacari does not accept any responsibility for the protection of your personal data supplied to these other sites or any "threats" that may arise from accessing them.

## 13. Data Retention

Jacari retains data for only as long as necessary and in line with the relevant Data Protection legislations or any legal requirement. Once you have stopped having involvement with Jacari services, we will remove non-essential data related to these services and only keep minimal contact and service information for 7 years, save for where Jacari has a reason to retain the data including but not limited to the handling of a potential dispute.

We will not retain personal data obtained during volunteer recruitment rounds if the individuals do not become active volunteers. This includes unsuccessful applications and contact details collected at student fairs. Data will be removed within 12 months.

## 14. Internet security

Jacari strives to protect any information submitted to our website. However, it would be impossible for us to guarantee that any information is completely safe due to the nature of the internet. Therefore, you acknowledge and accept this risk upon providing any personal data to Jacari.

Once the data provided has been transmitted to us successfully we will take reasonable steps to ensure that the data is secure and prevent any unauthorised access and loss of data as long as it is within our control. We can take no responsibility or be held liable for any damages arising that is beyond our control.

Data that we collect on you will be passed to an enforcement agency should we feel we have a legal obligation to do so.

## **15. Governing Law**

Jacari and its sites shall be governed by the law of the member state in which we are established, namely the United Kingdom, specifically England & Wales.

## **16. Laptop donation and lending scheme**

Since October 2020, Jacari has developed a laptop donation and lending scheme to ensure none of the pupils on our tuition programme are digitally excluded. Agreements are signed by both laptop donors and families that laptops are loaned to, and the terms and conditions are set out in the respective agreements.

With specific reference to data: for laptop donations, the donors agree to remove all data from the donated equipment prior to handover to Jacari. Under no circumstances is Jacari responsible to the donor for loss of or destruction of any data following handover. For laptop loans, Jacari agrees to thoroughly wipe all data from returned equipment as soon as possible after it is returned. Jacari will wipe all data from loaned laptops at least once a year.

## **17. Further Information**

Our Data Protection Officer (DPO) is: Susie Perks

If you have any queries on this policy, wish to contact the DPO or know further details on how Jacari uses personal data please contact us at: [info@jacari.org](mailto:info@jacari.org) or [susie.perks@jacari.org](mailto:susie.perks@jacari.org).

If you wish to opt-out of something specific; then please email us at [info@jacari.org](mailto:info@jacari.org)

Any general correspondence should go to:  
Jacari, The Unity Centre, 7 Unity Street. Bristol, BS1 5HH