



## **Project Impact – Data Protection Policy**

Project Impact inspires and empowers young people to make an impact in their community and beyond, through meaningful volunteering and social action. The volunteering sessions empower and challenge young people and enable them to develop useful life skills. Project Impact encourages the next generation to grow into community-focused leaders. The programme runs at several locations, with central volunteering events throughout the year. Project Impact also raises awareness about its work through events and other activities.

This document sets out the policy of Project Impact on the processing of personal data (that is, information by which an individual can be identified) collected by Project Impact in the course of its lawful activities, and explains Project Impact's obligations and individual rights under the Data Protection Act 2018, the General Data Protection regulation and any related or subsequent UK legislation and regulations ('Data Protection laws'). This Data Protection Policy (the 'Policy') has been put in place to protect rights under the Data Protection laws.

References in this Policy to the processing of information includes the collection, use, storage and protection of data, whether electronic or hard copy.

Project Impact is the 'data controller' for the purposes of this policy, unless and except where otherwise stated or is apparent from the circumstances, and the policy extends to its employees, trustees, volunteers and anyone else processing data on behalf of Project Impact from time to time.

Project Impact is committed to ensuring that privacy is protected. Any personal data collected by Project Impact will only be processed in accordance with this Policy.

Organisations are permitted to process data if they have a legal basis for doing so. Project Impact processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed; and/or
- Project Impact has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so that they can enter into a contract or agreement; and/or
- There is a legal obligation on Project Impact to process data.

Where Project Impact is relying solely on consent as the basis for processing data, it will obtain  
Registered address: c/- JVN, Wohl Campus, 44a Albert Road, London NW4 2SJ  
Registered charity number: 1192624

explicit consent. Individuals can modify or withdraw their consent at any time by written notification, although this may affect the extent to which Project ImpACT is able to provide services.

Project ImpACT may change this policy from time to time. but will always process personal data in accordance with rights and Project ImpACT's obligations in law.

### **What data do we collect?**

Project ImpACT collects data necessary for it to pursue its stated charitable objectives: promoting and providing opportunities for volunteering and social action for young people within the Jewish community; keeping our supporters informed of our activities; marketing; fundraising and the effective running of Project ImpACT through its professional staff, trustees and volunteers. Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses together with emergency telephone numbers and contact details of parents, guardians or others
- The names of schools and synagogues attended by participants for the purpose of analysing how and to what extent Project ImpACT is engaging with different parts of the community in which we operate
- Such other information as may be required to run activities and events, such as dietary requirements, medical information, photographs and information necessary to ensure that participants, including vulnerable persons, are looked after and safeguarded
- Records and preferences for and of staff, volunteers, donor and event and programme participants including, where necessary, bank or payment details in order to process payments to or from such persons and information about their tax status for the collection of Gift Aid or the payment of remuneration
- Project ImpACT employee and volunteer personnel information
- Such other information that is relevant and necessary for Project ImpACT to carry out its activities, charitable purposes and legal obligations.

We may also, from time to time, receive data from other organisations acting as data controllers, in which case Project ImpACT is a data processor within the meaning of the Data Protections laws, and will process such data in line with any lawful instructions given to us that do not contravene this policy.

### **What Project ImpACT does with the data it processes**

Project ImpACT uses the data collected to maintain accurate internal records of our engagement with volunteers, charities, supporters, partner organisations, staff, trustees and others. These records facilitate our activities run in accordance with our charitable objects, including providing opportunities for young people and recording volunteering activity, and raising funds and awareness about our work through campaigns and events.

Data may be processed and viewed, to the extent necessary, by employees, trustees and volunteers in the course of Project ImpACT's activities (all of whom work in accordance with this Policy) and will be retained only for as long as is reasonable and permissible in law. Project ImpACT expects employees, trustees and volunteers to maintain full confidentiality of this data.

Data subjects may request removal from mailing lists and deletion of their data at any time in writing, subject to any overriding legal requirement for its retention.

### **Individuals' rights in relation to their personal data**

Project ImpACT has issued a Data Protection Privacy Notice which summarises the information held, why it is held and the other parties to whom it may be passed on. This is available on the Project ImpACT website.

Data subjects may request details of personal information which Project ImpACT holds about them. Any such request must be submitted in writing. A small fee may be payable if an information request is particularly onerous.

Data subjects may choose to restrict the collection or use of their personal information, but this may inhibit or limit the way in which Project ImpACT is able to interact with them. They may, at any time, change their mind about what information Project ImpACT may hold, subject to any legal obligation on Project ImpACT to retain data, such as the retention of Gift Aid records for Her Majesty's Revenue and Customs.

Data subjects are responsible for the accuracy of data provided to Project ImpACT. Project ImpACT will promptly correct any information found to be incorrect.

Project ImpACT may use personal information to send information about Project ImpACT and matters relating to Project ImpACT's activities.

Project ImpACT will only share data with trusted third parties as stated above, or where necessary to communicate (such as mailing companies for postal communications or through email campaigns or newsletters) and only once it is satisfied that any such use of data will accord with this Policy. Project ImpACT will not sell or share personal information with any other businesses or marketing companies without explicit consent.

Further information about Data Protection and privacy laws is at the Information Commissioner's website at: <https://ico.org.uk/your-data-matters>.

### **Security**

Project ImpACT is committed to ensuring that information is secure. In order to prevent unauthorised access or disclosure, Project ImpACT has put in place physical, electronic and managerial procedures to safeguard and secure the data processed. Persons processing data on behalf of Project ImpACT do so in accordance with this policy and on the basis that Project ImpACT is satisfied that they can and will adhere to Project ImpACT's high standards for data protection and security.

The transmission of information over the internet is inherently insecure and Project ImpACT

cannot guarantee the security of data sent over the internet. Those who use the Project ImpACT website are responsible for keeping their password confidential.

### **Web Browsing and Cookies**

A cookie is a small file which asks permission to be placed on a user's computer hard drive. Once agreed, the file is added and the cookie helps analyse web traffic. Cookies allow web applications to respond to users as individuals. The web application can tailor its operations to needs, likes and dislikes by gathering and remembering information about preferences.

Project ImpACT may use traffic log cookies to identify which pages of Project ImpACT's website are being used. This would help to analyse data about web page traffic and improve the website in order to tailor it to customer needs. Project ImpACT would only use this information for statistical analysis purposes and then the data would be removed from the system.

Overall, cookies would help Project ImpACT provide a better website experience, by enabling Project ImpACT to monitor which pages people find useful. A cookie gives access to no data other than that which the user chooses to share.

Project ImpACT may also collect and store information about a user's browsing device, IP address, operating system and browser type, together with certain anonymous statistical data about browsing activities and patterns which does not contain any personal data.

### **Links to other websites**

Our website may contain links to other websites of interest. We cannot be responsible for the protection and privacy of any information which users provide whilst visiting such sites and such sites are not governed by this Policy.

This policy will be reviewed annually.  
It was last updated on [25 ] April 2021.