

## BOSP PRIVACY NOTICE

### Volunteers



BOSP is committed to respecting your privacy. This notice is to explain how we may use personal data we collect before, during and after your relationship with us as a volunteer. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information. This notice applies to current and former volunteers and this notice is not a contract of employment or other contract to provide services.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, instead our Board of trustees and CEO have overall responsibility for data protection compliance within BOSP, supported by our Data Protection Lead. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

### PERSONAL DATA

When you sign up to become a volunteer with us, you may provide us with or we may obtain personal data about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- date of birth;
- gender;
- details of family members and emergency contacts;
- bank account details for payment of any out of pocket expenses;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your volunteering history;
- any identification documents;
- all information included as part of the volunteering application process;
- referee details and any references provided;
- performance including any feedback provided to us by yourself, members of staff or other third parties;
- the location in which you are volunteering;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you

### SPECIAL CATEGORIES OF PERSONAL INFORMATION

BOSP may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans

BOSP may not collect all of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that: the processing is necessary for reasons of substantial public interest, on a lawful basis;

- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary in order to protect the vital interests of the data subject or another natural person;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

## WHERE WE COLLECT YOUR DATA

We typically collect personal data about our volunteers through the application process, either directly from you, or sometimes from a third-party agency. We may sometimes collect additional information from third parties including former clubs or other organisations you may have volunteered for or via background check agencies. We will also collect additional personal data throughout the period of you volunteering for us and when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way. We also may collect personal data about you from any third party references you provide as part of the application process for becoming a volunteer or from any feedback provided to us about your performance as a volunteer.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal data we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal data**” section below.

## USES MADE OF YOUR PERSONAL DATA

The table below describes the main purposes for which we process your personal data, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal data used</b>	<b>Lawful basis</b>
Making a decision about your appointment as a volunteer and managing the appointment process	All the personal data we collect from you as part of the application process. Records of volunteering history. Referee details and any references	We need this information to be able to perform and administer your contract with us as a volunteer
To produce and maintain our website and any external marketing campaigns in order to promote volunteer opportunities and to recognise the value created by our volunteers	Images in video and/or photographic form and voice recordings	Where you have given us your consent to do so
Paying you for any out of pocket expenses	Transaction and payment information	We need this information to make any out-of-pocket expense payments to you

Assessing experience for a particular role or task	Records of your volunteering history. All information included as part of the volunteering application process	We have a legitimate business interest to ensure that our volunteers are suitable for the role
Dealing with legal disputes involving you, or any other volunteers, including accidents	All non-‘special categories’ of personal data	We have a legitimate business interest to ensure that all legal claims are managed effectively. We also have a legal obligation to report any accidents at a workplace in accordance with health and safety laws
To prevent and detect criminal or improper acts	Identification documents	We may have a legal obligation to do so, otherwise we have a legitimate business interest to protect our organisation against criminal or improper acts
Storage of records relating to you and also records relating to our organisation	All non-‘special categories’ of personal data	We need this information to be able to fulfil our contract with you
To send you information we think you might find useful or which you have requested from us, including our newsletters, information about volunteering opportunities and other ways of supporting our organisation, provided you have indicated that you are happy to be contacted for these purposes	Personal contact details such as name, title, email addresses and telephone numbers	Where you have given us your consent to do so
To arrange and administer your attendance at an event you have volunteered for	Personal contact details. Details of family members and emergency contacts	This is necessary to enable us to register you on to and properly manage and administer your attendance at the event
For the purposes of equal opportunities monitoring	Name, title, date of birth; gender, location of volunteering	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our organisation is offering fair volunteering opportunities to everyone
To assess your performance as a volunteer	Performance including any feedback provided to us by yourself, members of staff or other third parties	We have a legitimate interest to ensure your suitability for any future volunteering roles and to ensure that your volunteering experience with us is positive and worthwhile

Storage of records relating to you and also records relating to our organisation	All 'special categories' of personal data	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to provide appropriate adjustments to our facilities	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent

For some of your personal data you will have a legal, contractual or other requirement or obligation for you to provide us with your personal data. If you do not provide us with the requested personal data we may not be able to admit you as a volunteer or we may not be able to properly perform our arrangements with you or comply with legal obligations and we may have to terminate your position as a volunteer. For other personal data you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our arrangements with you as a volunteer.

Where you have given us your consent to use your personal data in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal data to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you as a volunteer.

## **DIRECT MARKETING**

We may contact you by email, phone, post or SMS with information about events, products and services we believe you may be interested in. We will only send marketing messages via email and SMS in accordance with the marketing preferences you set. We may, however, send you information in the post or call you under the legal basis of legitimate interest. You can let us know at any time that you do not wish to receive marketing by emailing us at [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk).

## **DISCLOSURE OF YOUR PERSONAL DATA**

We share personal data with the following parties:

- **Any party approved by you**
- **Other service providers:** for example IT services (including CRM, website, video- and teleconference services); All our third-party service providers are required to take appropriate security measures to protect your personal data

- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security
- Providing references to future employers or organisations you may wish to volunteer for

We do not disclose personal data to anyone else except as set out above. We will never share, sell, swap or rent your data to third parties for marketing purposes.

## **WHERE WE STORE YOUR PERSONAL DATA**

The personal data we collect from you as a service user is kept either in a locked and secure cabinet, drawer or locker, or in an electronic format on an encrypted computer or portable device. The personal data we collect is not transferred to and stored in countries outside of the UK and the European Union. We have security procedures, rules and technical measures in place to protect your personal data. Your personal data will be kept in a secure environment with access restricted on a need to know basis. We will take all reasonable steps to ensure that your personal data is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure.

## **HOW LONG DO WE KEEP PERSONAL DATA FOR?**

The duration for which we retain your personal data will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal data may be retained on a long-term basis: for example, personal data that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 6 years (if you are currently volunteering with us, this may be for 6 years after you last volunteered for us). Exceptions to this rule are:

Information that may be relevant to personal injury claims may be retained until the limitation period for those types of claims has expired. For personal injury claims this can be an extended period as the limitation period might not start to run until a long time after you have volunteered for us.

It is important to ensure that the personal data we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. To update the personal data we hold about you, you can contact us by using the details set out in the "Contacting us" section below.

## **YOUR RIGHTS IN RELATION TO PERSONAL DATA**

You have the following rights in relation to your personal data:

- the right to be informed about how your personal data is being used;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the erasure of your personal data in certain limited circumstances;
- the right to restrict processing of your personal data where certain requirements are met;
- the right to object to the processing of your personal data;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal data

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal data recorded and stored by us. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal data, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal data you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

### **USE OF COOKIES, SOCIAL MEDIA & OUR WEBSITE**

Cookies are text files which collect log on information and visitor behaviour information. Cookies track visitor use and compile statistical reports on website activity. Such information will not identify you personally, it provides statistical data about our visitors and their use of our website and does not identify any personal details whatsoever. It is used by us to analyse how visitors interact with the website so that we can continue to develop and improve it.

Most websites use cookies, and these are downloaded to your computer automatically, however when you visit BOSP's site for the first time you will have the opportunity to check you understand before you proceed. You can set your browser to accept or decline cookies. Please be aware that a decline preference may mean a loss of function in some of our website features.

You might find links to third party websites or advertisements on our website. These websites should have their own cookies and privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Personal data relating to any transactions entered into via our website will be encrypted to ensure its safety. The transmission of data via the internet is not completely secure and therefore, we cannot guarantee the security of data sent to us electronically and the transmission of such data is entirely at your own risk. Where applicable, we have given you/or where you have chosen a password so that you can access certain areas of our site, you are responsible for keeping this password confidential.

### **TRANSFER OF DATA TO THIRD COUNTRIES**

Some of the information you provide to us may be transferred outside the European Economic Area to countries such as the US. This is a transfer to a "third country". We will endeavour to tell you if your personal data is being held or shared with a third country and we will ensure the appropriate contractual provisions are in place to ensure that there are strict rules regarding both the confidentiality and security of your information.

BOSP may also work with suppliers and partners who make use of cloud and/or hosted technologies. We will endeavour to undertake data security due diligence on our partners and ensure that these partners conform to appropriate accreditations.

## **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal data.

## **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, or to exercise any of the above rights, please email [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk) or write to us at:

The Data Protection Lead  
BOSP  
The BOSP Office  
Wat Tyler Country Park  
Pitsea Hall Lane  
Pitsea  
Basildon  
Essex  
SS16 4UH