



# Respect Privacy Notice

## Our contact details

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## How we respect privacy when we deal with personal information collected by our organisation

This Privacy Notice applies to information we – Respect – collect about individuals who interact with our organisation. It explains:

- what personal information we process under what circumstance
- our legal bases for processing information
- how we use your data
- when we share your data
- how long we keep your data
- rights you have over your data
- why we use cookies on our website
- implications around modifications to this Notice.

If you have any comments or questions about this Notice, feel free to contact us at [info@respect.uk.net](mailto:info@respect.uk.net).

## 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Legal Basis	How we store your information
You are contacting our helplines by email, phone or webchat	Personal details, family details, lifestyle and social circumstances	<b>Consent</b> – you have given your active consent.	Anonymised information is stored in password protected folders

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<p>You are making a general enquiry or a complaint</p>	<p>Name, email, message</p>	<p><b>Consent</b> – you have given your active consent.</p>	<p>Stored in the email inbox to which you submit the request. Emails are deleted after 6 months.</p>
<p>You are making an information request to us</p>	<p>Name, email, message</p>	<p><b>Legitimate interests</b> – it is necessary for us to read and store your message so that we can respond in the way that you would expect.</p> <p><b>Consent</b> – you have given your active consent.</p>	<p>Information is passed on to the necessary person to answer questions. Stored in the email inbox to which you submit the request</p>
<p>You wish to attend, or have attended, a training course or event.</p>	<p>Name, email, job title, employer</p>	<p><b>Consent</b> – you have given your active consent.</p>	<p>This is passed to the training team, and then held on a web-based service accessed by password by training staff</p>
<p>You have made a donation to our organisation or are making another financial transaction e.g. paying for training</p>	<p>Name, email, address, payment information</p>	<p><b>Legitimate interests</b> – this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message.</p>	<p>Details processed by GoCardless for direct debts and Stripe for one off payments.</p>
<p>You have signed up to receive news and updates from Respect.</p>	<p>Name, job title, email address</p>	<p><b>Consent</b> – you have given your active consent.</p>	<p>Stored securely in a password-protected online email creation platform.</p>
<p>You have applied for a job or secondment with us.</p>	<p>Name, address, email address, phone number, education information, convictions, gender, age, racial and ethnic identity, first</p>	<p>Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process. Please see below for our lawful bases for collecting each type of information.</p> <p><b><u>Personal information in your job application</u></b></p> <p><b>Contract:</b> the processing is</p>	<p>Stored in the email inbox to which you submit your application, and in a secure location in Respect's IT filing structure</p>

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	<p>language, disability, sexual orientation, religion</p>	<p>necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p><b><u>Information around reasonable adjustments to be made under the Equality Act 2021 e.g. disability</u></b>  <b>Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations).</p> <p><b><u>Information around gender, age, racial and ethnic identity, first language, disability, sexual orientation, religion</u></b>          The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA2018 which again relates to processing for employment purposes.</p> <p><b><u>Criminal convictions</u></b>  <b>Public task</b>          We process information about applicant criminal convictions and offences. This information is asked of you when relevant to the role you are applying for. This information will be retrieved via a DBS/Enhanced DBS check and will be processed in accordance with our <a href="#">DBS policy</a>.</p>	
<p>You are a member of</p>	<p>Name, email</p>	<p><b>Contract</b> – by paying your</p>	<p>Web-based (cloud)</p>

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Respect	address, job title	membership fees you have entered a contractual relationship with us as set out in our membership terms and conditions.	service, password protected
You are using our website (See section 6 for further detail)	Website activity collected through cookies	<b>Consent</b> – you have given your active consent.	This data is anonymous and is stored by Google.
You are employed by Respect as an employee, consultant or casual worker.	Name, address, email address, phone number, education information, convictions, gender, age, racial and ethnic identity, first language, disability, sexual orientation, religion, terms & conditions of employment, payroll & remuneration information, bank details, NI & tax information, absence records, training records, employee details, disciplinary or grievance procedures, performance reviews, photographs	<p><b>Contract – Legitimate interests</b> – this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message.</p> <p><b>Legal obligation</b> – this information is necessary for us to fulfil our duties as an employer and to ensure compliance with statutory laws, regulations and rights.</p> <p><b>Legitimate interests</b> – this information is necessary to allow us to make decisions relating to your employment such as recruitment, salary reviews, absence management, disciplinary or grievance processes, annual leave &amp; other types of leave, diversity, legal disputes, etc.</p>	This data is stored in your personnel file, on email, and in the organisations HR, Finance and payroll management systems. Any personal sensitive data will be password protected either via document or for access to the relevant system

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## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this Notice.

For example, we may use your personal information to:

- reply to enquiries you send to us.
- handle donations or other transactions that you initiate. This may be done on our behalf by one of our external platforms, such as PayPal.
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- understand what aspects of our work people are interested in supporting. Information is analysed anonymously, and it will not identify you.
- fulfil our administrative requirements (for example, completing Gift Aid returns). We may also use your data for analytical purposes however you will not be identified when data is used for this purpose as the data is anonymous.

If you are a Respect employee, or have worked at Respect in the past, we may use your information to:

- maintain accurate and up-to-date employment records and contractual and statutory rights.
- process contractual and statutory processes & payments e.g. payroll, pension, tax & NI.
- make decisions about your employment including salary reviews, recruitment, performance management, absence management, disciplinary or grievance processes, provision of benefits.

## 3. When we share your data

In limited circumstances, we may approach you for your written consent to allow us to process certain personal data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data and there are no consequences for you of failing to do so.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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We may share your personal information with third parties where required by law, where it is necessary to administer a contract or agreement with you, to provide a benefit, or where we have a legitimate interest in doing so.

Your information may be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business area and IT staff if access to the data is necessary for performance of their roles.

We will only pass your data to third parties in the following circumstances:

- You have provided your explicit consent for us to pass data to a named third party, if required;
- We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- We are required by law to share your data e.g. required by a court of law or the police.
- Where there is a risk that you or someone else is at risk of immediate and significant harm. Where this is the case we will try and notify you of this prior to sharing information unless we believe this would cause an additional significant risk to you or another person.

All of our third-party service providers are required to take appropriate security measures to protect your personal data in line with Data Protection legislation. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

## 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised

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use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once data is no longer required by Respect we will retain and securely destroy your personal information in accordance with applicable laws and regulations

## 5. Rights you have over your data

Under data protection law, you have rights including:

- **Your right of access** – You have the right to ask us for copies of your personal information. All subject access requests will be dealt with by the Data Protection Officer and any requests received will be passed to them immediately. If the initial request is not in writing, the person will be immediately asked to put the request in writing, or the request will be forwarded directly to the Data Protection Officer who will do so. However, the fact that a request is not made in writing will never be used as a means of delaying the response. We are obliged to fully respond to any subject access request within 30 days which can be extended for a further two months.
- **Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** – You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not usually required to pay any charge for exercising your rights. However, Respect reserves the right to charge a 'reasonable fee' for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or if an individual requests further copies of their data.

If you make a request, Respect will respond to you in 30 days

If you would like to access the rights listed above, or any other legal rights

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you have over your data under current legislation, please get in touch with us on [info@respect.uk.net](mailto:info@respect.uk.net).

If you are an employee of Respect, you have some obligations under your employment contract to provide the organisation with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide Respect with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, evidence of your right to work in the UK, and payment details, have to be provided to enable Respect to enter a contract of employment with you. If you do not provide this information, this will hinder our ability to administer the rights and obligations arising as a result of an employment relationship efficiently.

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the top of this policy.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website. By continuing to browse our websites, you agree to our

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use of cookies.

We use the following cookies:

- Strictly necessary cookies  
These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies  
These cookies allow us to recognise and count the number of visitors to our website, and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.
- Functionality cookies  
These are used to recognise you when you return to the website and record that you are a user of our website, or whether your web browser has Javascript enabled.

Please note that third parties that you visit after clicking a weblink on our websites may also use cookies, over which we have no control.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect.

## Disabling cookies

You block cookies by activating the setting on your browser that allows you to refuse the settings of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after 5 years.

Web browsers may allow some control of most cookies through the browser settings. You can find out more about cookies, including how to see what cookies have been set and how to manage and delete them at [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). For information on how to do this on a mobile phone, please refer to the handset instructions.

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## 7. Modifications

We may modify this Privacy Notice from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

### **Policy review**

This Privacy Notice was signed off by Respect's Sustainability subgroup on 31/01/2022 and will initially be reviewed after 12 months; from thereon, every 3 years.

Next review date: 31/01/2023