

## **Mantell Gwynedd Privacy Notice**

### **Introduction**

Mantell is a member of the Third Sector Support Wales (it is one of the CVCs) as noted below. Third Sector Support Wales (TSSW) is a collaboration between Wales Council for Voluntary Action (WCVA) and the County Voluntary Councils (CVCs) in Wales (referred to in this notice collectively as “we” or “us”). Our shared goal is to enable the third sector and volunteers across Wales to contribute fully to individual and community well-being, now and for the future.

In order to meet this goal we have collaborated on the development of two databases (the Databases). One is a Client Relationship Management (CRM) system which we can use to store details of the organisations that we work with and record any interactions between TSSW members and these organisations. We can also record contact details for people who are interested in our work, whether as individuals or on behalf of their organisations and use the CRM system to manage our communications with them.

The other database is a Volunteer Management System that enables TSSW to support the bringing together of those wanting to volunteer and those third sector organisations that need volunteers in a way that improves the volunteer experience and volunteer management process. The databases are separate, but linked together

We have developed this privacy notice in order to be as transparent as possible about the Databases and the personal information contained within them. This privacy notice has been written for the individuals whose personal information is contained in the Databases (referred to in this notice as “you”). We treat data privacy very seriously and comply with all aspects of the UK’s data protection legislative framework which includes the European General Data Protection Regulation (GDPR) and the UK’s own legislation.

### **What information does this privacy notice contain?**

We ask that you read this privacy notice carefully as it contains important information about:

- what personal information is stored in the Databases

- how and for what purposes the personal information held in the Databases is used (this is known as processing);
- the lawful basis for such processing;
- how and from where we collect your personal information;
- who has access to the information contained in the Databases;
- third parties with whom we may share your personal information;
- how long we keep your personal information;
- how you can manage your communication preferences; and
- where to find out more information about your privacy rights.

### **Data Controller**

Although the Databases are managed by WCVA, the information in the Databases is held on behalf of all the members of TSSW, i.e. WCVA and the CVCs in Wales together. We are joint data controllers of the personal information contained in the databases. We have entered into a Memorandum of Understanding (MOU) that governs our relationship in connection with the Databases.

Each of the organisations that has signed up to the MOU has appointed a contact who is responsible for the Databases. For WCVA, this contact is the same person as WCVA's Data Protection Officer (DPO). Full details of the organisations and how to contact them can be found here <https://www.wcva.org.uk/members-partners/third-sector-support-wales> or email us at [enquiries@mantellgwynedd.com](mailto:enquiries@mantellgwynedd.com) .

### **Categories of Personal Information**

The following categories of personal information are held in the Databases:

- first and last name
- your preferred salutation
- any honours that you have
- organisation
- job title
- contact address(es)
- contact email addresses(es)

- contact telephone number(s)
- emergency contact number(s) – volunteers and service users only
- date of birth – volunteers and service users only
- details relevant to your search for volunteering opportunities
- details of your interests in the third sector and communication preferences
- your language preference (Welsh or English)

We also keep details of your gender, racial or ethnic origin and physical or mental health or condition, if you have provided these to us voluntarily.

### **What is the Personal Information Used For?**

The main purpose of the Databases is to enable us to manage our communications with people and organisations that wish to hear from us. Using the personal information in the databases we can send communications that we think will be of interest to you by email, phone, SMS, post, social media and other digital channels. The use of the shared central Databases avoids unnecessary duplication. The Databases also have a facility which enable you to manage the communications you receive more effectively.

The Databases are also a tool to enable us to match volunteering opportunities with volunteers.

We can also use the Databases to provide insight and analysis to help us to continually improve the effectiveness of our communications, develop the products and services we offer our member organisations, monitor the reach of our communications and the diversity of the recipients and provide reports to funders and regulators.

Please note, except in the case of volunteers that information about your gender, racial or ethnic origin and physical or mental health or condition will only ever be used for statistical and monitoring purposes on an anonymised basis.

If you are interested in volunteering, the Databases allow you to voluntarily provide information about specific requirements you may have arising from a physical or mental health condition.

## **Sources of Information**

The personal information contained in the CRM system was initially imported into it from databases held separately by WCVA and Mantell Gwynedd. The Volunteer Management System is an entirely new database.

The information contained in the Databases may be added to with information that has come from a variety of sources including:

- information obtained directly from you
- information obtained from organisations that are members of or have an association with us – it may be that you work for one of these organisations or volunteer for them and the organisation has passed your details to us
- information collected at events or training courses that we run
- information that is publically available including from on-line sources and social media
- information that is generated by us and recorded in the Databases, such as your interests and communication preferences

## **The Legal Basis**

We will only store your personal information in the databases where we can do so lawfully. The data protection legislative framework provides for a limited number of reasons for processing personal information.

We are relying on the following lawful bases to process general information:

- where we have your consent
- where our processing of your personal data is in the public interest
- where our processing of your personal data is necessary for our legitimate interests or those of a third party and are not overridden by your privacy rights

In this case the legitimate interests are those of WCVA and the CVCs (including Mantell Gwynedd) who have signed up to the MOU who wish to communicate with interested people and organisations about their work and the services they offer. We also have the legitimate interest of

wishing to share resources and work collaboratively by having effective central databases. We believe that this is also in the public interest.

Your privacy rights are protected because the Databases store only basic information about you, there is a strict protocol of who can access your personal information and you have the ability to control your communication preferences. You can also object to us storing and using your personal information at any time as outlined below.

The data protection legislative framework contains specific provisions that enable us to process information about your gender, racial or ethnic origin and physical or mental health or condition in order to monitor diversity on an anonymised basis. For volunteers information about your physical or mental health or condition can be processed with your explicit consent.

### **Who can access your Personal Information**

Although the Databases are a collaboration, not all of the members of TSSW can access and use your personal information.

We have established a strict protocol, contained in the MOU, to ensure your information is only accessed and used by WCVA staff or a particular CVC where:

- you have an existing relationship with the relevant TSSW member that predates the development of the Databases
- you have consented to receiving communications from the relevant TSSW member
- the TSSW member has a specific legitimate interest in using your information because for example, they are running an event in the area in which you live or work

As WCVA are responsible for managing the Databases, a small number of WCVA Staff can access all of the information contained in the Databases.

### **Sharing your personal information with Third Parties**

This section of the privacy notice provides details of third parties with whom we may share the personal information contained in the Databases.

The Databases are hosted by third parties called Sales Force and Team Kinetic. Although Sales Force and Team Kinetic have access to the information in the Databases in order to ensure that they are working effectively at all times, they are not permitted to use the information for any reason.

We may also run anonymised aggregated reports off the databases and share these with the Welsh Government, local authorities, health boards and the Charity Commission. These reports may also be published. We will not share your personal information with these bodies however or give them access to the “raw” data on which the reports are based. The TSSW members may appoint an external researcher to help us with this work, who would have access to the information contained in the Databases.

TSSW may also appoint an internal or external evaluation to assess the effectiveness of the Databases. The evaluator would have access to the personal information contained in the Databases, but would not be able to use any of the information.

We do not transfer personal information contained in the Databases outside the European Economic Area (EEA). None of the service providers we use to help us provide the Databases are based outside of the EEA.

### **Your Communication Preferences**

The Databases offer us functionality that enables you to determine your communication preferences, both with regard to the format of the communication, the topic and which organisations you would like to hear from. Please e-mail us at [enquiries@mantellgwynedd.com](mailto:enquiries@mantellgwynedd.com) to update or amend your communications preferences at any time. Please note that it may take up to 10 working days for any changes to be processed.

### **How long we will keep your personal information**

The data protection legislative framework places an obligation on us to review the length of time for which we keep personal information. We are only able to keep your personal information for as long as it is necessary for us to do so. We only intend to keep your information in an identifiable form in the Databases while you remain happy to keep receiving communications from us, or while you wish to be informed of volunteering opportunities. We have no current plans to delete your information.

### **Individual Rights**

You have a number of rights in relation to the personal information held in the Databases. If you wish to exercise any of the rights, please contact Mantell Gwynedd in one of the ways mentioned below.

- You have a right of access the personal information we hold about you
- You have the right to correct any information we have about you that you think is wrong or incomplete
- You have the right to object to our use of your personal information for direct marketing purposes. If you no longer want to receive communications from us, please contact us. We will stop sending you communications, but will continue to keep a record of you and your request not to hear from us.
- You have the right to ask us to delete your information. You should be aware that if we do this, we will have no record of the fact that you have asked not to receive communications from us. It is therefore possible that you may start receiving communications from us at some point in the future, if we obtain your details from a different source.
- Where our processing of your personal information is based on your consent, you have the right to withdraw it at any time. Please contact us if you want to do so.

### **Contact Details**

enquiries@mantellgwynedd.com

01286 672 626

### **How to Complain**

Please let us know if you are unhappy with how we have used your personal information.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern <https://ico.org.uk/make-a-complaint>

### **Changes to this Privacy Notice**

This privacy notice was last updated on 01/10/2018. We keep this privacy notice under regular review and may change it from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We would encourage you to check this privacy notice for any changes on a regular basis.

List of TSSW Members and contact details:

<https://www.wcva.org.uk/members-partners/third-sector-support-wales?seq.lang=en-GB>