



Privacy Policy Post Office Orphans Benevolent Institution

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POST OFFICE ORPHANS BENEVOLENT INSTITUTION (POOBI)

Our Privacy Policy

POOBI is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection the Data Controller is POOBI.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers POOBI and any subcontracted work according to the agreed SLA for the Rowland Hill Fund in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information please contact the Secretary to the Trustees at poobi.secretary@royalmail.com or by post to: The Secretary, POOBI, Royal Mail, 185 Farringdon Road, LONDON EC1A 1AA.

What type of personal information we collect

The type and amount of information we collect depends on why you are providing it.

The information we collect when you make an enquiry includes your name, the subject of your application, your employment status in relation to Royal Mail and/or Post Office Ltd.; the age and date of birth of your children who are the subject of the application, your email address, your postal address and your phone number.

If you are a supporter, for example making a donation or volunteering in addition to asking for your name and contact details (your full address, email address and your phone number) we may also ask you for example, reasons for supporting the Society.

If you are an applicant for any bursary, Rising Stars; University Bursary or a Regular Grant we may require and hold your bank details, and may provide these to Royal Mail and the Rowland Hill Fund for processing payments. We ensure these are processed securely externally.

If you are a grant applicant the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application. Included in the former are the personal statements you provide about your personal circumstances and those of your children in support of your application.

We also collect your national insurance number for the purposes of adhering to the HMRC common reporting standards.

How we collect information

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit our website and create or update an account
- donate to us or fundraise for us
- enquire about our activities or services
- volunteer for us
- attend a meeting with us and provide us with information
- complete an application on line or via the Royal Mail Helpline
- contact us in any way including online, email, phone, SMS, social media or post

Where we collect information from

We collect information:

- (1) From you when you give it to us directly: You may provide your details when you ask us for information or make a donation, volunteer, attend our events contact us for any other reason.
- (2) When you give it to us indirectly, for example your information may be collected by the Charities Trust and Royal Mail who are working with us regarding pay roll giving. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.
- (3) When you have given other organisations permission to share it: Such as the Rowland Hill Fund and Royal Mail; your information may be provided to us by other organisations if you have given them your permission. The information we receive from other organisations depends on your settings or the option responses you have given them.
- (4) When you use our website: When you use our website information about you is recorded and stored.

How we use your information

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- assessing your applications for grants or bursaries for means to provide for the child or children concerned, hardship and other factors offered by yourself such as health issues
- providing you with the information or services you have asked for
- processing donations you make, including processing for Gift Aid purposes
- sending you communications with your consent that may be of interest including marketing information about our services and activities, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support
- seeking your views on the services or activities we carry on so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted

Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at poobi.secretary@royalmail.com. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- It is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract.
- It is necessary to comply with our legal obligations including the common reporting legislation which requires us to hold records of tax domicile.
- Where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.
- We also work with the Rowland Hill Fund and Royal Mail which requires the provision of information to them to enable them to fulfil part of a request for assistance. This is for the legitimate interest of POOBI to carry out its primary objective of assessing grants and bursaries and organising the necessary administration of payments.

If you want to contact us about your marketing preferences please contact the Secretary at poobi.secretary@royalmail.com

How we keep your information safe

We understand the importance of security of your personal information and take appropriate steps to safeguard it.

Your data when held on POOBI's website is fully protected and encrypted. Other data is held with the Royal Mail Network and benefits from all their information security protection. Hard copy data is in locked cupboards in locked rooms solely used by POOBI and the Rowland Hill Fund.

We always ensure only authorised persons have access to your information, which means only our staff, volunteers and contractors, and that everyone who has access is appropriately trained to manage your information.

Whilst POOBI and Royal Mail have a secure network we interact with external internet and email and no external data transmission over the internet can be guaranteed to be 100% secure. So while POOBI strives to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

Who has access to your information?

- Third parties who provide services for us, for example once a year our processes are audited by our appointed accountants. Also the Rowland Hill Fund our IT services provider and for mailing and marketing purposes. We select our third party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

Keeping your information up to date

We really appreciate it if you let us know if your contact details change. You can do so by contacting us at the poobi.secretary@royalmail.com

Our use of “cookies”

We only use cookies for login purposes; this is a temporary cookie and is removed from your system when the browser is closed. No personal information is stored in our cookies.

Children's Information

Our purpose at POOBI as a friendly society is specifically on behalf of the children of past and present employees of Royal Mail and Post Office Ltd. Therefore we will legitimately require information about the children who are the subject and concern of the cases we are assessing and have assessed. Where appropriate we will ask for consent from a parent or guardian to collect information about children under 13.¹

We recognise the sensitivity of children's data. Any sensitive personal information on children, such as medical information, is dealt with the utmost confidential processes and is safeguarded in our processes stated in this policy with specific attention and focus.

How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold normally records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes. Please see our Records Retention Policy on our website.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for two years. We may periodically ask you to renew your consent.²

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing at no charge except in very limited circumstances which will be explained to you if relevant. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy on our website Poobi.org.

You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the “right to be forgotten”);
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”);
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact the Secretary at poobi.secretary@royalmail.com.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner’s Office. Further details about how to complain can be found [here](#). [LINK to ICO guidance]

Changes to this Privacy Policy

This Policy may be changed from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information.

Do please check this Policy each time you consider giving your personal information to us.

¹ Parental consent under GDPR is required re the context of information society services to children (for example Facebook) but not otherwise. Charities working with children will wish to have their own policies on consent. Under the Data Protection Act 1998, children have been able to exercise their own data rights as soon as they have capacity and understanding, which is ordinarily assumed by age 12.

² The Fundraiser Regulator states that the period should be assessed having regard to how long the individual would consider it reasonable to be contacted before they are asked to renew consent. (See Fundraiser Regulator’s Personal Information and Fundraising: Consent, Purpose and Transparency 21 February 2017 www.fundraisingregulator.org.uk).

This Policy was last updated in November 2020.