



Privacy Notice  
Post Office Orphans  
Benevolent Institution

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# POST OFFICE ORPHANS BENEVOLENT INSTITUTION (POOBI)

## Our Privacy Notice

Post Office Orphans Benevolent Institution (POOBI) (a Friendly Society registered with the Financial Conduct Authority: No. 37BEN) is committed to protecting and respecting your privacy. For the purposes of the UK General Data Protection Regulation (the UK GDPR) and any subsequent UK legislation covering data protection, POOBI is the Controller of your personal data (which means that we determine the purposes (the why) and the means (the how) of the processing of your data).

This Notice sets out why we collect personal data and how we use it. It explains the legal basis for our processing of your data and your rights.

This Notice covers POOBI and any subcontracted work according to the agreed SLA for the Rowland Hill Fund in relation to the collection and use of your personal data. We may change this Notice from time to time. We will advertise any changes on our website and if we make any significant changes, we will contact you directly with the information.

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

### What type of personal data we collect

The type and amount of personal data we collect depends on the purposes for which we will need to use it.

The personal data 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 donating 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 for your reasons for supporting POOBI.

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 personal data you are asked to provide is as set out in the application and necessary for the purposes of our considering the application. It will include the statements you provide about your personal circumstances and those of your children in support of your application (including information on any hardship and other relevant factors, including health issues).

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

### When we collect your personal data

We may collect personal data 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 online or via the Royal Mail Helpline;
- are the subject of an application made by a parent (or individual with the parental responsibilities);
- contact us in any way including online email, phone, SMS, social media or post.

### **How we collect your personal data**

We collect your personal data in the following ways:

- (1) Information you give us directly: for example, you may provide your details to us when you ask us for information or donate, volunteer, attend our events or contact us for any other reason. In connection with our grant programmes, we need to collect and process personal data of the applicant and the applicant's children [or, potentially other family members] to enable us to process the applications.
- (2) **Information we obtain indirectly:** for example, your personal data may be collected by the Charities Trust and Royal Mail who are working with us regarding pay roll giving. They will do so in accordance with their own Privacy Notice which you should check when you give your details.
- (3) **Information shared by third party organisations with your permission:** such as the Rowland Hill Fund and Royal Mail. Your personal data may be provided to us by other organisations if you have given them your consent. The personal data we receive from other organisations depends on the scope of your consent.
- (4) **Information collected when you use our website:** when you use our website, some limited information about you is recorded and temporarily stored (please see the "Cookies" section below for more details).
- (5) **Information available publicly:** for example, we may include in our newsletters some information obtained from social media or from articles/newsletters.

### **How we use your personal data**

We will use your personal data for various purposes consistent with the legal basis we rely on to process your data. These purposes include:

- assessing your applications for grants or bursaries for means to provide for the child or children concerned;
- 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.

We do not use your personal data in automated decision-making (i.e. we do not make decisions using automated means without human involvement).

### **Our legal basis for processing your information**

Data protection law requires us to have a lawful basis for processing your personal data. Depending on the purposes for which we use your data, we may rely on one or more of the following lawful bases:

- **Consent:** Where you have provided your consent for us to use your personal data. You may withdraw consent at any time by emailing us at [poobi.secretary@royalmail.com](mailto: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.

- **Performance of a contract:** It may be necessary for us to use your information to carry out our obligations under a contract entered into with you or to take steps you ask us to take prior to entering into a contract. For example, if you agree to work for us.
- **Legal obligations:** It may be necessary for us to use your information to comply with our legal obligations. For example, if we are legally required to hold transaction details for Gift Aid or accounting/tax purposes.

**Legitimate interests:** It may be necessary for us to use your personal data for the purposes of “legitimate interests” pursued by POOBI or a third party (as long as those legitimate interests are not overridden by your rights and freedoms) Examples include:

- Where we need to provide information or services to you, we may rely on the fact that it is necessary for our legitimate interests to provide the information or service requested, and given that you have made the request, we would presume that there is no prejudice to you.
- Where our work with the Rowland Hill Fund and Royal Mail 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. Where we need to process your personal data to administer, to carry out research or audit our accounts.

If you want to contact us about your marketing preferences please contact the Secretary at [poobi.secretary@royalmail.com](mailto:poobi.secretary@royalmail.com)

Where we need to process special category data (i.e. personal data that merits additional protection), for example information concerning health, in addition to a lawful basis, we also satisfy an appropriate condition for the processing, in accordance with Article 9 of the UK GDPR. This means that where health information [ADD OTHER CATEGORIES if relevant, for example ethnicity data] has been provided by you in support of a grant application, we will obtain your explicit consent for our use of such data (your consent may be withdrawn at any time by emailing [poobi.secretary@royalmail.com](mailto:poobi.secretary@royalmail.com)).

### **How we keep your personal data safe**

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

Your personal 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 cabinets in locked rooms solely used by POOBI and the Rowland Hill Fund.

We always ensure that only authorised persons have access to your personal data, which means only those members of our staff, volunteers and contractors who need to access your data to fulfil their roles. Everyone who has access to personal data is appropriately trained and aware of their obligations to ensure confidentiality and security of your data.

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 personal data, we cannot guarantee the security of any information you provide online and you do this at your own risk.

## **Who has access to your personal data?**

We will not share your personal data with third parties without your consent unless the law allows us to. We may disclose your personal data to the following third parties, to enable us to provide our services, fulfil our charitable objectives or comply with our legal obligations:

- The Rowland Hill Fund;
- The Royal Mail PLC;
- HMRC;

We also need to disclose your data to companies who provide services for us, for example our appointed accountants, our IT services provider and parties providing mailing and marketing services. We select all third-party service providers with care and provide them with the minimum amount of information necessary to provide their service. We always have an appropriate agreement in place that requires them to protect personal data to the same standard as we do.

## **Keeping your information up to date**

We really appreciate it if you could let us know if your contact details change. You can do so by contacting us at the [poobi.secretary@royalmail.com](mailto: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 personal data**

Our purpose at POOBI as a Friendly Society is to provide support to, specifically, the children of past and present employees of Royal Mail and Post Office Ltd. Therefore, we do use personal data of children who are the subject and concern of the cases we are assessing and have assessed. Where we are relying on the legal basis of consent, we will usually obtain consent from the child’s parent or carer. In some situations, where we consider the child to have a sufficient level of understanding about their rights and the use of their personal data (this is usually assumed at around age 12) then we may require consent from the child.

We recognise the sensitivity of children’s data. Any sensitive personal information on children, such as medical information, is dealt in utmost confidence and is safeguarded in our processes stated in our Personal Data Protection Policy. For further information about how we use children’s personal data in connection with grant applications, please contact [poobi.secretary@royalmail.com](mailto:poobi.secretary@royalmail.com).

## **How long we keep your personal data for**

We will hold your personal data for as long as it is necessary for the relevant activity. By way of example, we normally hold records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes. Our Records Retention Policy sets out appropriate retention periods.

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. POOBI does not normally contact you directly about marketing or fundraising, should we do so in future you can ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details on our marketing suppression list to ensure we comply with your request.

## **Your rights**

You have the right to:

- be informed about how we collect and use your personal data;

- ask for access to your personal data;
- require us to correct any mistakes in the personal data we hold about you;
- ask for the information we hold about you to be erased in certain circumstances;
- ask for our processing of your personal information to be restricted in certain circumstances;
- receive your data in a form allowing you to transit it to another data controller (portability); and
- object to us processing your personal data in certain circumstances.

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, please contact the Secretary at [poobi.secretary@royalmail.com](mailto:poobi.secretary@royalmail.com).

If you are not happy with the way in which we have processed your personal data or dealt with your request, then you may raise the issue with the Secretary at [poobi.secretary@royalmail.com](mailto:poobi.secretary@royalmail.com) in the first instance. You can also complain to the Information Commissioner's Office via:

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

<https://ico.org.uk/make-a-complaint/>

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

This Privacy Notice was published on 1 May 2021. This Notice may be changed from time to time. We will advertise any changes on our website or, if the changes are significant, we will contact you directly with the information.