

Privacy Policy v2.2

Purpose:	To detail the Privacy Policy at North Cotswold Foodbank		
Date:	June 2025	Approved:	2 October 25
Contact:	Kevin Carden, Foodbank Manager		
Version:	v2.2	For Review:	May 2028

Version	Author	Date	Changes
v1.0	Kevin Carden, Project Manager	July 2021	Approved
v2.0	Kevin Carden, Project Manager	July 2024	Reformatted document layout, minor spelling and grammar corrections change of reason to legal basis where it relates to one of the grounds in Article 6 of GDPR Amendments to: para 1.3 added meaning of data privacy para 1.4 amended to focus on data privacy para 1.5 & 6.2 updated number of foodbanks in the Trussell network para 2.1.3 minor amendment to clarify meaning of visit

Version	Author	Date	Changes
			a foodbank para 2.1.5 revised to including volunteers Section 3: amended to clarify what data is kept for different groups of people para 3.2.5 added explanation of why personal information collected when making a donation para 3.2.6 added collection of ethnicity data para 3.2.6.6 added explanation of why sensitive personal data may be collected for employees and volunteers para 3.4.1.6 deleted as information referred to is not collected. Following para renumbered para 5.4.1 amended wording to include to information only collected with consent of donor para 5.2.4 Added para on collection and use of ethnicity information para 5.5.4 Added para on release of personal information when a complaint is made para 5.8.7 Added para on use of volunteers personal data by the Trussell para 5.10.3 added personal consent as reason to process data para 6.1 amended to clarify when data may be shared para 6.6 added para on transfer of personal data as part of an acquisition or merger Section 7 updated to describe situations where data is transferred outside the EEA Section 8 Revised wording para 8.3 updated link to cookies and privacy policy for NCFB website para 9.2 amended to detail the reasons we may contact a donor

Version	Author	Date	Changes
2.1	Garry Dick (Chairman)	March 2025	Updated logo Section 7 Heading changed from Transferring personal data outside of the UK / EEA to International transfers of data
2.2	Jonathan Brown, Trustee	June 2025	Replaced Trussell Trust with Trussell throughout the document. Minor spelling and grammar corrections throughout Para 1.5 replaced Project Manager with Foodbank Manager Para 2.1.2 Clarified that personal data may be collected for both financial and non-financial donations Para 1.6 and 6.2 updated number of food banks in the Trussell network Para 3.2.2 added that information about relationship to other people in the household is collected and why it is collected Para 3.4 - added as appropriate as not all information is collected for volunteers Para 4.4 amended to include we believe either your life or someone else's life is at risk. Para 5.1 added note that what follows are some of the reasons we collect information. For a comprehensive list see the Record of Processing Activities Para 5.4.2 added consent to reasons for processing personal data Para 5.6.1 added note that consent is the lawful basis for processing this information. Para 5.7.1 added note that consent is the lawful basis for processing this information. Para 7.2 added 'of the EU Commission' Para 9.3.6 timescale amended to 30 days in line with GDPR Art12(3) Para 10.2 added 'for specific periods of time'

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1. Introduction

- 1.1. North Cotswold Foodbank is a data controller registered with the [UK Information Commissioner's Office](#), registration number Z3439570.
- 1.2. Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.
- 1.3. Data privacy is about the privacy laws around using your personal information.
- 1.4. We have policies, procedures and training in place to help our people understand their responsibilities when collecting, retaining or deleting data.
- 1.5. The Foodbank Manager serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email info@northcotswold.foodbank.org.uk

- 1.6. This Privacy Policy relates to personal information that North Cotswold Foodbank collects and uses. We are an independent charitable organisation which is part of the Trussell Foodbank Network. We share personal information about food bank use with Trussell which is a separate data controller. Trussell directly supports over 1400 food bank centres throughout the UK which together represent the Foodbank Network. For more information about who we share your personal data with please visit the "[Sharing personal information](#)" section below.

2. How we collect personal information

- 2.1. We may collect your personal information from you directly when you:
- 2.1.1. communicate with us for any reason, by post, telephone, text, email or via our website
 - 2.1.2. make a donation, whether of money or something else, for example food, toiletries
 - 2.1.3. are referred to a food bank or visit to seek a food parcel
 - 2.1.4. participate in a survey or research
 - 2.1.5. work, or volunteer, or make an application to work or volunteer for us
 - 2.1.6. agree to help us promote our work
 - 2.1.7. interact with us as a supplier, contractor, consultant or in any other capacity.
- 2.2. We may also collect personal information about you from other organisations. For example, from a referral agency like a doctor's surgery, when you are referred to the food bank.

3. The personal information that we collect

- 3.1. We only collect personal information that we genuinely need.

3.2. For people referred to the food bank:

- 3.2.1. We will keep the data that is on your food bank voucher(s) including your name; address; and date of birth
- 3.2.2. information about your household, including the number of other adults and children living with you and your relationship to them. This information helps us to signpost you to further sources of support.
- 3.2.3. the reason you were referred
- 3.2.4. where you give permission we will also keep any dietary requirements and a phone number so the food bank can contact you about any support available.
- 3.2.5. We will also keep a record of which agency gave you the food bank voucher
- 3.2.6. The agency issuing your food voucher may ask you for your ethnicity. This is for statistical purposes to ensure we are meeting the needs of all sections of the community. We cannot

tie your answer to you as an individual. You can decline to answer the question and it will not affect the service you receive from us

3.3. For Supporters:

- 3.3.1. Financial information that you provide to us, for example, payment information when making a donation
- 3.3.2. Contact information you provide with consent when donating food, joining our campaigns, or signup to receive communications from us.

3.4. For job and volunteer applicants we may also collect, as appropriate:

- 3.4.1.1. your bank account details, tax and residency status
- 3.4.1.2. references from previous employers or educational institutions
- 3.4.1.3. contact details for your family members and next of kin
- 3.4.1.4. qualifications
- 3.4.1.5. information concerning your health and medical conditions
- 3.4.1.6. details of criminal convictions.

4. Our legal basis for processing personal information

- 4.1. Our legal bases for processing personal information are usually for our legitimate interests, or your consent, or for the performance of a contract or to meet our legal obligations.
- 4.2. We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.
- 4.3. We will always ask you to 'opt-in' to receiving marketing emails and text messages from us. You can unsubscribe from this at any time.
- 4.4. Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe either your life or someone else's life is at risk.
- 4.5. We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract), or because we are legally obliged to do so, for example to meet employment or charity laws.

5. Why we collect personal information

- 5.1. We collect and use personal information about people who use food banks, supporters, job applicants and volunteers for a number of reasons. Some of these are as follows¹:

¹ For the full list of personal information collected and how it is used see the [Record of Processing Activities](#)

5.2. Assisting people that use food banks

- 5.2.1. We collect personal information from you directly if you have to use a food bank, or via an organisation that refers you to a food bank.
- 5.2.2. Our legal basis for using this information is your consent as we wish to respond to your need for help, and ensure that we are providing help when and where it is most needed.
- 5.2.3. We will share this information with Trussell which works with us and other food banks to support our network and uses anonymised statistical data to campaign at a national level to challenge the structural issues that lock people into poverty.
- 5.2.4. The organisation that refers you may also ask you about your ethnicity. We use this information to help us to better understand if we're meeting the needs of different groups in our communities. This is sensitive personal information and we need your explicit consent to hold it. You can choose not to provide this information and it won't affect the help you receive in any way. If you provide this information, it cannot be seen by others and once you collect your parcel this information is anonymised (so that it can't be linked to you).

5.3. Developing relationships with supporters

- 5.3.1. Our work is made possible because of the generosity of our supporters. We need a good understanding of our supporters so that we can communicate with them effectively and appropriately.
- 5.3.2. We will only send you marketing communications via email or text where you have opted in to receiving them.
- 5.3.3. You can unsubscribe from receiving these communications at any time by contacting info@northcotswold.foodbank.org.uk

5.4. Processing donations

- 5.4.1. If you kindly make a donation to us (of food or money), we will use your personal information with your consent to collect your donation and maintain a record of our supporters. If you donate via our website you will be asked to give consent to contact you about our work
- 5.4.2. Our legal basis for using your personal information for this purpose is either your consent or to fulfil our legitimate interest and fundraising objectives.
- 5.4.3. We are legally required by HMRC to collect some personal information if you choose to Gift Aid your financial donation.

5.5. Dealing with complaints and appeals

- 5.5.1. If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal.
- 5.5.2. This may include sharing relevant information with Trussell or the person that the complaint has been made about.

- 5.5.3. Our legal basis for using personal information for this purpose is legitimate interest.
- 5.5.4. If you make a complaint about an individual and this forms part of their personal data and the individual requests access to it, we will seek to remove personal information identifying you first. In some situations, we may be obliged to provide your personal data. We will seek your consent before providing the information but may be required to provide this even if you do not consent.

5.6. Promoting our work

- 5.6.1. We will use personal information that you share with us if you agree to help us promote our work. This might include photographs and videos. For example, we may use your information in case studies and stories that we publish or share with the media. We will only use your information for this purpose if you have given your consent for us to do so, which is the lawful basis for using this information.

5.7. Carrying out surveys and research

- 5.7.1. If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. Consent is therefore the lawful basis for our processing of your personal data here.
- 5.7.2. We may use a university or work with Trussell to undertake analysis of survey responses.
- 5.7.3. Survey results are anonymised before being shared or published.

5.8. Employee and volunteer administration and development

- 5.8.1. We will process personal information of our employees to fulfil our contract with them, and to meet our legal obligations as an employer. This includes payroll processing and the provision of training.
- 5.8.2. We are required by law to share some financial information with the HMRC.
- 5.8.3. We may also need to share some personal information with other organisations, for example solicitors, pension providers.
- 5.8.4. Where you volunteer with us, we collect personal information to support the administration of your volunteering activity.
- 5.8.5. Our legal basis for processing volunteers' personal information is our legitimate interest or to meet our legal obligations.
- 5.8.6. We share personal information about our employees and volunteers with Trussell to support the work of the Foodbank Network.
- 5.8.7. Trussell uses statistical and aggregate information about volunteers in the Foodbank Network to help develop and improve people's experiences of volunteering, for equalities monitoring purposes, and to evidence the impact of volunteering across the Foodbank Network.

5.9. Recruitment

- 5.9.1. If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your enquiry.
- 5.9.2. We will not store this information for any purpose other than that relating to your application.
- 5.9.3. Our legal basis for using your information in this way is for our legitimate interest.

5.10. Undertaking safeguarding activities including DBS checks

- 5.10.1. When necessary, we process relevant personal information about employees and volunteers for safeguarding purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of.
- 5.10.2. It may be necessary to share some personal information with relevant authorities such as the police.
- 5.10.3. Our legal basis for this processing is to meet our legal obligations and, where appropriate, your consent.

5.11. Processing expenses

- 5.11.1. We will use your personal information including your bank account details to process expense claims.
- 5.11.2. Our legal basis for using your information for this is for the performance of a contract.

5.12. Governance

- 5.12.1. We process relevant personal information about existing and potential trustee members for governance purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees.
- 5.12.2. Our legal basis for this processing is to meet our legal obligations with the Charity Commission and Companies House.

6. Sharing personal information

- 6.1. We will only share your personal information where we need to, where someone's life is at risk or we are required to do so by law.
- 6.2. We may share your personal information with Trussell which is a separate data controller. Trussell directly supports over 1400 food bank centres throughout the UK which together represent the Foodbank Network. When we share your personal information with Trussell we will inform you as outlined in the section "Why we collect personal information" above. We have

a data sharing agreement in place with Trussell which sets out what information is shared, why and how we share the data.

- 6.3. We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers. We have data processing agreements or clauses in place with any data processors that we may use.
- 6.4. We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.
- 6.5. Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.
- 6.6. In some situations, the organisation may transfer some or all its assets as part of a merger or acquisition. If another organisation acquires the food bank, they will hold substantially all the same information and will assume the rights and obligations with respect to the personal information as described in this privacy policy.

7. International transfers of data

- 7.1. We may need to transfer some personal data to the third parties described above who are located outside of the UK., for example information submitted via Google, the Peak-on survey or a form hosted on our website². In such cases, we will take appropriate measures to ensure your personal data remains protected.
- 7.2. If the organisation is based outside of the UK and in a country that is not protected by an adequacy decision of the EU Commission (providing an adequate level of data protection) we will take appropriate safeguards, such as implementing International Data Transfer Agreements as part of our contracts with our processors.
- 7.3. If you have any questions or need more information regarding international transfers of your personal data, please contact us at info@northcotswold.foodbank.org.uk

8. Cookies and aggregate information collected from our website

- 8.1. We use cookies and other tracking technologies to store information about how you use our sites. A cookie is a piece of data stored on a user's computer to remember information about

² For information about Google's practices please see: <https://policies.google.com/privacy/frameworks>

For details relating to the governance of data transfers by Peakon see: <https://www.workday.com/content/dam/web/en-us/documents/privacy/workday-binding-corporate-rules-for-processors.pdf>

The website hosted on WP engine is hosted in the US and is subject to a Data Privacy Addendum following approved EU Standard Contractual Clauses which are accepted by the ICO as an appropriate transfer mechanism: <https://wpengine.co.uk/legal/dpa/>

you and create a profile of your viewing preferences. Your profile is used to tailor your visit to our website, make navigation easier, and direct you to information that best corresponds to your interests. We require your consent to place non-essential cookies on your device. You can change your cookie preferences by selecting the Privacy and Cookies option from any page on our website.

- 8.2. Our website uses Google Analytics who act as a processor to collect aggregate information from users. This information includes browser type, referring/exit pages, platform type, date/time of visit, number of clicks, error pages, and number of unique visits. This information is not linked to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer the website and to gather broad demographic information of our website users. For additional information about Google's privacy practices, please see [Google's privacy policy](#).
- 8.3. To view our cookies policy visit <https://northcotswold.foodbank.org.uk/privacy-cookies-policy/>

9. Your rights

- 9.1. If you no longer wish to receive communications about products and services from us, please contact info@northcotswold.foodbank.org.uk
- 9.2. You can also unsubscribe at any time to emails that we may send to you about our work, fundraising, advocacy and campaigning. A link to unsubscribe from all direct marketing will be included in any communications.
- 9.3. You have the right to:
 - 9.3.1. Ask us for copies of your personal information.
 - 9.3.2. Tell us to change or correct your personal information if it is incomplete or inaccurate.
 - 9.3.3. Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
 - 9.3.4. Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
 - 9.3.5. Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you.
 - 9.3.6. For all requests please contact us at info@northcotswold.foodbank.org.uk. We will respond to any request within 30 days.
 - 9.3.7. Please note that we may be entitled to refuse requests where exceptions apply, for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

10. How long we keep your personal information

- 10.1. We will hold your personal information only for as long as necessary. We will not retain your personal information if it is no longer required.
- 10.2. In some circumstances, we may legally be required to retain your personal information for specific periods of time, for example for finance, employment or audit purposes.
- 10.3. We have in place a personal data retention schedule which sets out how long we keep your personal information for. Please contact info@northcotswold.foodbank.org.uk if you wish to see our personal data retention schedule.

11. Changes to this policy

- 11.1. This Privacy Policy may change from time to time. Changes to the policy will be reflected in the Privacy Statements on our [website](#)

12. Making a complaint to the Information Commissioner's Office

- 12.1. If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

This policy was approved by the Trustees:

Name: Garry Dick	Signed:
Position: Chair	Date:

Appendix 1 Related Documents

