



## **Sing Inside: Data and Privacy statement**

**Sing Inside takes your privacy seriously and is committed to protecting your personal information. We aim to be clear and open about our data and security practices.**

This statement explains how Sing Inside handles and uses the personal information we collect about our volunteers for processes relating to our operations and activities. When changes are made to this statement, we will email you.

Where we ask you to provide us with any information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement, and in line with the General Data Protection Regulation (GDPR) 2018 and other relevant legislation and regulations.

The controller for your personal information is Sing Inside, whose Chief Executive is Maisie Hulbert. The person responsible for data protection within the organisation is our Head of Policy, Giverny McAndry, who can be contacted on [giverny@singinside.org](mailto:giverny@singinside.org).

### Information about you

#### **What information do we collect about you?**

We collect information about you when you fill in an online form to:

- Sign up for email updates
- Contact us
- Place orders for free or paid products or services
- Volunteer with us
- Complete surveys or provide feedback

This information may include:

- Name
- Contact details including email address
- Demographic information such as postcode and interests
- Diversity related information such as race and ethnicity on an optional basis

If you sign up to volunteer on a prison visit, we may need to ask for your National Insurance Number, date of birth, address or occupation, and information concerning any previous offences or time spent in prison. We may also need to ask for information about any ongoing medical conditions and required medication. We collect this because many prisons require this kind of information in advance to run appropriate security checks. **By signing up for a visit, you give**



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Sing Inside permission to share the necessary information with the prisons we visit, who will manage that information according to their own privacy policies. We will delete this information as soon as the visit has happened, along with any emails that contain personal data.

We also collect information on your website usage through cookies (see next section) if your browser accepts them. Some of our tools feature tracking software – this means that if you're a logged-in user, have filled an online form or have previously clicked a link in one of our emails, we may link your website usage information (such as pages visited, IP address, browser and device used) to other information we hold about you, such as your name.

We collect material that you proactively post or contribute to our website and any correspondence you have with us.

When you contact us by email, letter or on the phone, we may also record this information to help us process your request efficiently.

### **Online forms**

The forms we use are built via two platforms.

Our sign-up forms are operated through Mailchimp, a platform hosted [in this country]. The information you provide to Mailchimp is stored in a secure database at mailchimp.com. The contract we have with this provider ensures their practices comply with the EU's General Data Protection Regulation 2018. We regularly delete data from this system and you can update the data we hold on you at any time via emails from us. The contract we have with this provider ensures their practices comply with the EU's General Data Protection Regulation 2018.

We also use Google Forms to gather information about our workshops, including volunteers' details and other details required by prisons. This information is hosted on a secure server and is deleted as soon as the visit has taken place, and is only ever shared with security contacts at prisons.

We delete any data which is not strictly required for our business needs at regular intervals.

### **How we use your personal information**

We collect and process your personal information for a number of purposes, including:

- Communicating with you about Sing Inside's activities and updates;
- Maintaining a formal record of your activities with us;
- Managing fundraising;
- Monitoring the diversity of our volunteers;
- Monitoring how people hear about Sing Inside.



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We also use your information to help us develop products and services, and where we have a lawful basis and permission to contact you, we may use it to help us send you relevant and timely information about our work and how you may get involved. Where appropriate, we will use your information to process any order you make for purchases, or fulfil any contract we have with you.

We use information collected from your website visits to personalise your future visits and to improve the experience we provide to our online users. For example, information like the browser and device you are using helps us to maintain usable and accessible websites for all our audiences.

Our normal legal basis for processing your personal information is that we believe it is in our legitimate interests to do so, in order for the charity to run effectively and efficiently, and as we only collect and use minimal information for the limited purposes listed here we do not consider that your own interests override ours. If we use your personal information outside of the purposes listed here, we will seek your consent to do so in advance.

We remind our members annually, usually in June, that they are subscribed to our mailing list and suggest they check their details. If your email address expires and you are automatically removed from the mailing list you may receive an email asking if you would like to change your details. If we manually remove your data for any reason, we will notify you before removing you from our mailing list in the event that you would like to opt-in to carry on receiving communication from us.

### **How we store your personal information**

Personal information is not shared outside of the charity. We use Google Drive, Slack and MailChimp to coordinate prison visits and events, and this is also where your personal information is stored in advance of visits.

If you are a student and volunteer with us via one of our university societies, we may share some of your personal information with the University, but only where there is a specific need to. Local Committees will communicate directly with any individuals whose data will be shared in this way, and may provide further privacy statements to you concerning how the university will use your data.

We may also be subject to a legal requirement (with or without your consent) to share your personal information with the University or a government agency (such as the police or security services or other statutory authorities with investigatory powers) under special circumstances



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(e.g. relating to tax, crime or health and safety). Where feasible and appropriate, we will notify you of our intention to share such information in advance.

## **Security and encryption**

We take great care to ensure that our websites operate at the highest security levels and that our suppliers are committed to best practice in digital security. All personal information and financial data is password protected. However, the security of data transmission via the internet can never be 100% guaranteed, and data transmission is at your own risk.

## **How long do we keep your information?**

We do not keep your information for longer than necessary. We keep financial information for seven years due to legal requirements, and we delete all other personal information from our customer relationship management system if we have had no contact with you for three years.

## **Access to your information**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, you can contact us.

We will not charge you for this service unless the request is 'manifestly unfounded or excessive or repetitive'.

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

We want to make sure that any personal information we hold about you is accurate and up to date. Please contact us to correct or remove information you think is inaccurate.

## **Sharing your information with other organisations**

Sing Inside will not sell your information to any third party. We may share your information with third parties where we have legal duty to do so or to provide you with a service you have asked for. For example, we use a third party supplier to dispatch publications you may buy on our sites and we use secure third party partners to process financial transactions. We have contracts in place with all third party suppliers to ensure they are obligated to treat our customers' personal data in compliance with the General Data Protection Regulation 2018.

If Sing Inside is acquired by a third party, personal data held by Sing Inside will be one of the transferred assets.

## **Cookies**



## What are cookies and how do we use them?

The use of cookies is common practice on modern websites. A cookie is a small text file which is placed on your computer's hard drive by a website. When you visit one of our websites, your browser checks to see if it has any cookies for it and sends the information contained in those cookies back to the site in order to tailor and improve your experience.

Our cookies record things like whether you are currently logged into your website account, to ensure you're given the right access on each page. They make sure the display settings you've selected before (for example, preferred language) – or the settings associated with your account permissions – are activated correctly.

We also use third-party cookies to track how our websites are used, as well as to carry out our advertising and marketing activities.

## Third-party cookies

When you visit our website, we allow a number of third parties including Wix to set cookies on your device to help us better understand who our users are and how they use our websites.

This information enables us to:

- measure our sites' effectiveness
- improve our content and user experience
- make our websites more useful and relevant to your interests
- promote our services and resources more usefully online
- limit the number of times you see our promotional advertising

For example, we use Wix cookies to collect anonymous usage and visitor behaviour information. These cookies help us understand the demographics and interests of our users so we can better meet their needs. This includes:

- IP address
- operating system
- browser type
- pages visited
- links you click on
- services you purchase

Some of the services on our websites, such as sharing functions from Facebook, Twitter or LinkedIn, may place cookies on your computer to enable their service to work properly or to measure usage of their service.

To find out more about how the third parties referred to above use cookies and how to opt out of them, please review their privacy policies.

## Email cookies



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Our emails and websites contain cookies to tell us whether emails are opened and verify any clicks through to links within an email. We use this information to help us understand how an email campaign has performed, what types of emails and content our users find interesting, and what actions our users took, so we can improve our email campaigns in the future and make our emails more relevant to you.

### **Can I refuse cookies?**

Yes, you can use your browser settings to disable cookies. Different browsers offer different levels of control – for example you may be able to accept certain cookies and reject others, such as third party cookies.

If you refuse cookies please be aware our websites may not work smoothly for you and there will be certain parts that won't function correctly. You can delete the cookies stored on your computer at any time.

### **More information**

For further information about cookies, including how to manage your cookie settings, you can visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Other websites**

Our websites contain links to other websites not run by Sing Inside. This privacy policy only applies to Sing Inside websites so when you link to other websites you should read their own privacy policies.

### **Your rights**

You have the right to access the personal information that we hold about you. You also have the right to ask us to correct any inaccurate personal information we hold about you, to delete personal information, or otherwise restrict our processing, or to object to processing or communications, or to receive an electronic copy of the personal information you provided to us. Please note that all of these rights are qualified in various ways.

You have a right to stop us from contacting you for marketing purposes at any time. All our marketing emails contain unsubscribe links. You can also contact us at any time to request a change to your marketing preferences.



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If you have questions or concerns about how your personal information is used, please contact us using the above details.

If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

### **Changes to our privacy policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated in April 2020.

### **Who we are and how to contact us**

Sing Inside is registered in England as a charitable incorporated organisation with the Charity Commission. [[hyperlink to CC website](#)]

If you have any questions about our privacy policy or information we hold about you, you can contact us. [[hyperlink to 'contact us' page](#)]

Last updated: 01.05.2020