

## **THE WHEELS PROJECT LTD**

**31-32 Bonville Road**

**Brislington**

**BRISTOL BS4 5QH**

Registered Charity No: 1081236

# **DATA PROTECTION / PRIVACY POLICY**

## **Introduction**

The Wheels Project Ltd (“we”) promises to respect any personal data you share with us or is given to us by other agencies or organisations. We also pledge to keep any personal data we hold safe and secure. We aim to be clear about what you can expect from us when we collect your data, what we intend to do with it and we want to reassure you that we would not do anything you wouldn’t reasonably expect (for example – we will never sell your details on to third parties).

We will collect and manage your data in line with the General Data Protection Regulation 2017 (GDPR) and the Data Protection Act 2018.

We shall protect the privacy of students, staff and Trustees at The Wheels Project Ltd. We shall not publish names, photographs or any other personal data in the public domain without first obtaining the express permission in writing from the individual(s) concerned. In the case of minors, we shall need the permission first from their parent(s) or guardian(s).

Developing a better understanding of our supporters through their personal data allows us to make better decisions, fundraise more efficiently and, ultimately, helps us to reach our goal of enabling more young people to experience what it is like working in a motor vehicle workshop, learning about road safety and having the chance to drive a variety of vehicles in a range of settings. We have made improvements to this policy to make it more understandable to supporters.

Our marketing communications include information about our latest events, initiatives, programmes and achievements. If you would like to receive such communications but have not opted in, please sign up with us by contacting us on;

0117 977 1717

[www.wheelsproject.org.uk](http://www.wheelsproject.org.uk)

[david@wheelsproject.org.uk](mailto:david@wheelsproject.org.uk)

## **What is personal data?**

Personal data is any information that tells us something about you. This could include information such as your name, contact details, date of birth, and references.

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

We collect your personal data in the following ways:

### **When you give it to us DIRECTLY**

You may give us your personal data in order to sign up for one of our programmes or events; tell us your story, make a donation, enrol, apply for a job or communicate with us.

### **When you give it to us INDIRECTLY**

Your personal data may be shared with us by independent event organisers, for example British Schools Karting Championship (BSKC) [www.bskc.co.uk](http://www.bskc.co.uk) or other sub contracted programme providers such as British Red Cross, Roadsmart, Teamsport Karting and factory/museum visits indicated once you have indicated your wish to support The Wheels Project Ltd, Bristol with your consent.

For employees, volunteers and trustees we may receive personal data indirectly when we check references or perform background checks.

You should check our sub-contractors [Privacy Policy when you provide your information in order to understand fully how they will process your data.](#)

### **When you give permission to OTHER ORGANISATIONS to share, or it is available publicly**

We may combine data you provide to us with data available from external sources in order to gain a better understanding of your interests and our supporters to improve our fundraising methods, products and services.

The data we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

#### **Social Media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access data from those accounts or services.

#### **Personal data available publicly**

This may include data found in places such as Companies House, LinkedIn and information that has been published in articles/newspapers.

## **We collect it as you use our WEBSITES or READ OUR EMAILS**

Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields. There are more details in our Cookie Policy.

In addition, the type of device you’re using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you’re using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

We can accept no responsibility for any consequences arising from your acceptance of said cookies.

## **What personal data we collect and how we use it**

The type and quantity of personal data we collect and how we use it depends on why you are providing it.

### **Students**

If you attend our programmes, we will usually collect a combination of the following:

- Your name
- Position in the organisation
- Your contact details
- Your date of birth

And where it is appropriate, we may also ask for:

- Information relating to your health (for example if you are taking part in a high-risk event)
- Behaviours on grounds of personal safety and to others
- Family history
- Previous achievements
- Why you have decided to join, refer or donate to us.

We will mainly use your data to:

- Provide you with the support, products, programmes or information you gave or asked for
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information.

## **Supporters/Donors/Volunteers**

If you support us by making a donation, volunteering, registering to fundraise, signing up for an event or in some other capacity, we will collect a combination of the following:

- Your name
- Position in the organisation
- Your contact details
- Your date of birth
- Marketing preferences
- Financial information

And where it is appropriate, we may also ask for:

- Information relating to your health (for example if you are taking part in a high-risk event)
- Family history
- Previous achievements
- Why you have decided to join, refer or donate to us.

We will mainly use your data to:

- Provide you with the support, products, programmes or information you gave or asked for
- Administer your donation or support your fundraising, including processing gift aid
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information.

## **What is the legal basis that permits us to use your data?**

Under data protection legislation we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your personal data for employment/engagement related purposes:

- Where we need your personal data to enter into a contract with you
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we ask for your consent to send you marketing information

**[The [Table](#) at the end of this notice provides more detail about the personal data that we use, the legal basis that we rely on in each case and your rights.]**

Some personal data is classified as "*special*" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious or philosophical beliefs or political opinions, sexual orientation and trade union membership. This personal data is more sensitive, and we need to have further justifications for collecting, storing and using this type of personal data. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data. We may process special categories of personal data and criminal conviction information in limited circumstances with your explicit consent, in which case we will explain the purpose for which the personal data will be used at the point where we ask for your consent.

### **Building profiles of supporters, students and targeting communications**

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our supporters. Profiling also allows us to target our resources effectively. We do this because it allows us to understand the background of the people who support us, the students they refer and helps us to make appropriate requests to supporters who may be able and willing to give more than they already do. Importantly, it enables us to target our students better, raise more funds in good time and more cost-effectively, than we otherwise would.

When building a profile, we may analyse geographic, demographic and other information relating to our students and funders in order to better understand their interests and preferences in order to contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available. Such information is compiled using publicly available data, for example addresses, demographics, tie in with areas of high deprivation, listed Directorships or typical earnings in a given area.

### **Direct Marketing**

We will contact you to let you know about the progress we are making and to ask for donations or other support. Occasionally, we may include information from partner organisations or organisations who support us in these communications. We aim to make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions, and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine. Just let us know when you provide your data or contact us on 0117 977 1717 or [david@wheelsproject.org.uk](mailto:david@wheelsproject.org.uk)

We do not sell or share personal details to third parties for the purposes of marketing. But if we run an event in partnership with another named organisation your details may need to be shared. We will be very clear what will happen to your data when you register.

### **Sharing your story**

Some people choose to tell us about their time or one of their students on one of our programmes in order to share the impact of our work. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, their stories may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report. No names will be used in these stories which will betray the identification of our students.

### **Children's/schools data**

All children's personal data is confidential and will be kept in accordance with the Data Protection Act 2018 and General Data Protection Regulations 2017. We do not pass information on to third parties and would only share your details in exceptional circumstances, where we are legally bound to, for example where a child reports abuse.

### **How we keep your data safe and who has access?**

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted, and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and volunteers.

We sometimes use external companies to collect or process personal data on our behalf (for example Just Giving providing donation support). We do comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collect or have access to.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

### **When do we transfer your personal data overseas?**

When personal data is transferred to countries outside of the UK and the European Economic Area those countries may not offer an equivalent level of protection for personal data to the laws in the UK. Where this is the case, we will ensure that appropriate safeguards are put in place to protect your personal data.

The countries to which your personal data is transferred and the safeguards in place are detailed below:

- None

If you would like to see a copy of the adequacy mechanisms that we use to protect your personal data, please contact The General Manager

### **For how long do we keep your personal data?**

We will keep your personal data for up to 20 years depending on the criteria laid down by our funders

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

Where possible we use publicly available sources to keep your records up to date; for example, the Post Office's National Change of Address database and information

provided to us by other organisations as described above. We really appreciate it if you could let us know if your contact details change.

### **Your rights in relation to personal data**

You have a number of rights in relation to your personal data, these include the right to:

- be informed about how we use your personal data;
- obtain access to your personal data that we hold;
- request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal data in the following circumstances:
  - if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
  - if we are relying on consent as the legal basis for processing and you withdraw consent;
  - if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
  - if the personal data has been processed unlawfully (i.e., in breach of the requirements of the data protection legislation);
  - if it is necessary to delete the personal data to comply with a legal obligation.
- ask us to restrict our data processing activities where you consider that:
  - personal data is inaccurate;
  - our processing of your personal data is unlawful;
  - where we no longer need the personal data, but you require us to keep it to enable you to establish, exercise or defend a legal claim;
  - where you have raised an objection to our use of your personal data;
- request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to take steps to enter into a contract with you and personal data where we are relying on consent to process your personal data;
- object to our processing of your personal data where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection, we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data;
- not be subject to automated decisions which produce legal effects, or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact us on 0117 977 1711 or [office@wheelsproject.org.uk](mailto:office@wheelsproject.org.uk)

If you want to access your information, send a description of the information you want to see and proof of your identity by post to The General Manager, The Wheels Project Ltd, 31-32 Bonville Road, Brislington, Bristol. BS4 5QH. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

### **Complaints**

If you have any questions or complaints about the way, we use your personal data please send these to [office@wheelsproject.org.uk](mailto:office@wheelsproject.org.uk) who will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the Information Commissioner's Office. For further information please see the **Information Commissioner's guidance here**.

### **Changes to this Policy**

We may change this Privacy Policy from time to time. If we make any significant changes in the way, we treat your personal information we will make this clear on the Wheels Project Ltd website or by contacting you directly. If you have any questions, comments or suggestions, please let us know by contacting the General Manager, The Wheels Project, 31-32, Bonville Road, Brislington, BRISTOL BS4 5QH or email [office@wheelsproject.org.uk](mailto:office@wheelsproject.org.uk)

The Wheels Project Ltd is a registered charity in England and Wales (1081236) and a company limited by guarantee in England and Wales (2745215).

Registered address: 31-32 Bonville Road, Brislington, BRISTOL BS4 5QH



**Table: quick check of how we use your personal data**

**Students**

<b><u>Purpose</u></b>	<b><u>Personal data used</u></b>	<b><u>Legal basis</u></b>	<b><u>Which rights apply?</u></b>
Provide you with the support, products, programmes or information you gave or asked for	Personal contact details, responses to questions on forms	Legitimate interests. It is in our legitimate interests to provide you the support and programmes you asked for.	The generally applicable rights plus the right to object.
Keep a record of your relationship with us	Personal contact details, profile	Legitimate interests. It is in our legitimate interests to keep a record of how we work with you	The generally applicable rights plus the right to object.
Ensure we know how you prefer to be contacted	Personal contact details, marketing preferences	Legitimate interest. It is in our legitimate interest to communicate with our service users about our activities	The generally applicable rights plus the right to object.
Understand how we can improve our services, products or information.	Personal contact details, marketing preferences, feedback	Legitimate interest. It is in our legitimate interest to collect feedback in order to improve our services for students.	The generally applicable rights plus the right to object.

## Supporters

<u>Purpose</u>	<u>Personal data used</u>	<u>Legal basis</u>	<u>Which rights apply?</u>
Provide you with the support, products, programmes or information you gave or asked for	Personal contact details, responses to questions on forms	Legitimate interests. It is in our legitimate interests to evaluate whether you have the necessary skills and qualities to perform the relevant role.	The generally applicable rights plus the right to object.
Administer your donation or support your fundraising, including processing gift aid	Personal contact details	Legitimate interests. It is in our legitimate interest to be able to process your donations and support your fundraising for Wheels.	The generally applicable rights plus the right to object.
Keep a record of your relationship with us	Personal contact details, profile	Legitimate interests. It is in our legitimate interests to keep a record of how you support us.	The generally applicable rights plus the right to object.
Ensure we know how you prefer to be contacted	Personal contact details, marketing preferences	Legitimate interests. It is in our legitimate interest to be able to share information with you via the platforms you have opted-into.	The generally applicable rights plus the right to object.
Understand how we can improve our services, products or information.	Personal contact details, marketing preferences, feedback	Legitimate interests. It is in our legitimate interest to improve our services, products and information based on your feedback.	The generally applicable rights plus the right to object.