

## 1. Purpose of Policy

- 1.1 This Policy describes how we collect information from service-users and the general public, the type of personal and confidential information we collect and what we will use that information for.
- 1.2 References in this Policy to “we” or “us” means Wales Community Fire Safety Trust Limited (Firebrake Wales), a charity registered under number 1100964 and a company limited by guarantee, company number 4556865, whose registered office is at Ground Floor, 6 Hazell Drive, Newport NP10 8FY.
- 1.3 The charity will only use information that we collect about individuals in the manner set out in this Policy. We are committed to protecting personal and confidential information.
- 1.4 For the purposes of the Data Protection Act 1998, we are the data controller of your personal information.
- 1.5 We reserve the right to amend, vary and/or to withdraw this Policy from time to time. In the event of any changes we will be responsible for determining the appropriate form that such notification should take.

## 2. Collection of Personal and Confidential Information

- 2.1 **Personal** information is any information about an individual from which they can be identified, such as name, address and email address.
- 2.2 **Confidential** information would be information provided on the understanding that it will not be shared more widely or for purposes other than agreed.
- 2.3 Firebrake will collect personal and confidential information provided by individuals when they agree to provide this. For example, to make a donation, to participate in an interview or complete a survey, when booking a place for an event or contact the charity for other purposes in writing, by email, by phone or via the website.
- 2.4 We may also collect information about your use of the Firebrake Website when you access and browse the Firebrake Website. A separate Privacy Policy related to the website is available.
- 2.5 **Consent.** Personal and Confidential information may be supplied by the individuals themselves or by third-party partners involved in joint initiatives with Firebrake Wales. Where the information is supplied by a third-party, Firebrake will ensure that express consent is given to share this information with the charity and that individuals are aware of how the information will be managed and used.

### 3. Use of Personal and Confidential Information

Firebrake Wales will use the personal and confidential information provided by individuals for the following purposes:

- 3.1 If they wish to attend an event to enable the management and administration of the booking.
- 3.2 If they wish to obtain a product or service (free or fee-paying) for the purpose of processing the order.
- 3.3 If they participate in an interview, complete a survey or are otherwise involved in providing research information, for the purpose of collating, reporting and analysing the results of research.
- 3.4 If they make a donation or other payment, for the purpose of processing the donation or payment.
- 3.5 For any purpose which reasonably arises out of or in connection with the individual accessing the services of Firebrake Wales.
- 3.6 If the charity needs to notify individuals about important changes or developments in Firebrake Wales.
- 3.7 On occasion, to verify the personal and/or confidential information already supplied to ensure it is up to date and accurate. We reserve the right to request additional personal and/or confidential information from individuals in order to undertake checks (generally with respect to financial transactions) using appropriate third parties for this purpose. In such cases, we will obtain expressed consent to do this from the individual.
- 3.8 To contact individuals by post, telephone or email to promote the aims and objectives of the charity. Individuals may choose not to be contacted in this way for these purposes by writing to Firebrake Wales, Ground Floor, 6 Hazell Drive, Newport NP10 8FY, telephoning 01633 654 000 or emailing [info@firebrake.org](mailto:info@firebrake.org).
- 3.9 If an individual has consented to this, to contact them by fax or email to promote our aims and objectives, to request donations, to provide details of our and/or third parties' products and services which we think may be of interest to you and to ask you to complete questionnaires and surveys. You can choose not to be contacted in this way for these purposes by writing to us at Ground Floor, 6 Hazell Drive, Newport NP10 8FY, telephoning us on 01633 654000 or emailing us at [info@firebrake.org](mailto:info@firebrake.org).

### 4. Disclosure of Personal Information

We will not sell or hire the personal information we collect about individuals to any third parties. We do, however, reserve the right to disclose personal information in limited circumstances to certain third parties as follows:

- 4.1 To any sub-contractors we may engage to assist us in carrying out activities and services on behalf of the charity (e.g. researchers), where those sub-contractors must abide by Firebrake's own Data Protection requirements and standards of Firebrake's Privacy Policy.
- 4.2 To sub-contracted event providers to enable the administration and management of an event, where those sub-contractors must abide by

Firebrake's own Data Protection requirements and Privacy Policy.

- 4.3 To the individual's bank or building society and third parties who process donations and payments on our behalf.
- 4.4 To appropriate third parties for the purposes of verifying your personal information and/or creditworthiness (with respect to a donation or other financial transaction).
- 4.5 Where disclosure is necessary (i) in response to a subpoena, court order or government request or request by any other appropriate authority; (ii) for the purposes of taking legal action to establish or exercise our legal rights or defend legal claims against us; (iii) to investigate, prevent and/or take other action in connection with possible illegal activities, suspected fraud and/or situations involving potential threats to the physical safety of any persons; (iv) actual or suspected violations of the charity's data protection policies; or (v) as otherwise required and/or permitted by law or regulation.
- 4.6 We may also pass aggregate information on the usage of the Firebrake Website, participation in events, results of research studies, etc. to third parties but this will not include information that can be used to identify individuals (i.e. will be anonymous).

## 5. Disclosure of Confidential Information

We reserve the right to disclose your confidential information only in the following circumstances:

- 5.1 To your bank or credit/debit card provider for the purpose of obtaining donations or payments.
- 5.2 To appropriate third party organisations who process credit/debit card payments on behalf of the charity.
- 5.3 Aggregate information resulting from participation in events or research studies, but this will not include information that can be used to identify individuals.

## 6. Security and Accuracy of Information & Data Retention

- 6.1 Firebrake Wales has organisational measures in place designed to protect the personal and confidential information of individuals. We will use all reasonable measures to protect information from alteration, loss or misuse. We will retain personal and confidential information from individuals for a reasonable period and for so long as the law requires.
- 6.2 All information provided about individuals is stored on our secure servers. The charity will not be responsible for any personal information disclosed to third parties that does not offer a secure way to transmit information to the charity (e.g. email).
- 6.3 All information provided about individuals in printed format will be stored in locked filing systems and be available only to staff who require access to this information in order to undertake their work (e.g. event management, research studies, etc.).
- 6.4 All staff of the charity are bound by the organisation's policy on Confidentiality and breach of this policy or others related to information management and data protection could constitute a disciplinary offence.

- 6.5** All staff will receive adequate information and training on the management, storage and use of Personal and Confidential Information to ensure compliance with relevant policies.

## **7. Accessing and Updating Personal and Confidential Information**

Individuals are entitled to see the personal information held about them by the charity and they may ask the charity to make any necessary changes to ensure that it is accurate and kept up to date. Individuals wishing to access this information held by Firebrake Wales or update details of the information are asked to write to the Central Services Co-ordinator, Firebrake Wales, 6 Hazell Drive, Newport NP10 8FY. If the charity is informed in writing of any inaccuracies, we will use all reasonable endeavours to correct that information.

## **8. Destruction of Personal and Confidential Information.**

Manual destruction of files, records and computer printouts containing sensitive data and confidential information will be carried out in a secure manner (e.g. security shredding.) Personal and confidential information provided by electronic means will be deleted from the charity's systems on a regular basis.

## **9. Contact Details**

If individuals or organisations have any questions or comments about our Privacy Policy, please contact us via email at [info@firebrake.org](mailto:info@firebrake.org) or write to the Central Services Co-ordinator, Firebrake Wales, Ground Floor, 6 Hazell Drive, Newport NP10 8FY or telephone us on 01633 654000.



## **1. General**

In addition to the Firebrake Wales Privacy Policy, above, the following specifically relates to your **online privacy** and your use of the Firebrake Wales Website.

By using the Firebrake Wales website, you acknowledge that you have read our Privacy Policy (including this Online Privacy appendix).

By using the Firebrake Wales Website you also agree to be bound by our Website Terms of Use (link).

## **2. Collection and Use of Tracking Information Electronically**

We may collect information about your use of the Firebrake Website when you access and browse the Firebrake Website.

We may also collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration and reporting purposes. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

We may use technology to collect information about the patterns of behaviour of visitors to the Firebrake Website. This may include using a "cookie" which would be stored on your browser. A "cookie" is a small data file containing information that is written to a user's hard drive by a web server and used to track the pages visited. Any information collected in this way will be used:

- (a) to enhance your use of the Firebrake Website;
- (b) to track traffic patterns on the Firebrake Website; and
- (c) to provide reports for our internal use and/or to persons who provide content for the Firebrake Website and to suppliers of products and services advertised on the Firebrake Website.

You can control your internet browser's settings regarding "cookies" by selecting the appropriate option available on your internet browser. This will allow you either (i) to prevent your browser from accepting new "cookies"; (ii) to have your browser notify you when you receive a new "cookie" or (iii) to disable "cookies" altogether. This

may, however, prevent you from using certain features on the Firebrake Website.

Please note that persons who provide content for the Firebrake Website and suppliers of products and services advertised on the Firebrake Website may also use cookies, over which we have no control.

### **3. Use of your Personal Information**

In addition to the uses of your personal and confidential information outlined in our Privacy Policy (above), we may also use it:

- for any purpose which reasonably arises out of and/or in connection with your use of the Firebrake Website,
- to notify you about any important changes or developments to the Firebrake Website.

### **4. Disclosure**

We will not sell or hire personal information we collect about you to any third parties. However, in addition to the exceptions stated in our Privacy Policy, we also reserve the right to disclose your personal information to any subcontractors we may engage to assist us in operating the Firebrake Website, or to carry our other activities and services on behalf of Firebrake Wales. Any subcontractors used must abide by Firebrake's own Data Protection requirements and standards of Firebrake's Privacy Policy.

### **5. Links to other sites**

The Firebrake Website may from time to time contain links to and from the websites of other parties. We shall endeavour to ensure that links to other websites are clearly signposted.

Our Privacy Policy does not apply to any third parties over whom we have no control or to any other websites.

We recommend that you review any Privacy Policies applying to any third party websites before you submit any personal information to those websites.

