

# Privacy Policy

This privacy policy was most recently updated in March 2018.

Richmond Furniture Scheme is registered with the Information Commissioner's Office. (Registration No.ZA349935)

Richmond Furniture Scheme ("RFS") understands that privacy and the security of your personal information is extremely important. Because of that, this policy sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, as well as your rights over any personal information we hold about you. This policy applies to you if you use our products or services at our premises, over the phone, online, or by interacting with us on social media (our "Services"). This policy gives effect to our commitment to protect your personal information.

## 1. Our principles

RFS regards the lawful and appropriate treatment of personal information as very important to its successful operations and essential to maintaining confidence between RFS and those with whom we carry out business. We therefore fully endorse and adhere to the Principles of the General Data Protection Regulation.

RFS principles for protection of your privacy are as follows:

- We will only use your information where we have lawful grounds and legitimate business reasons to do so.
- If we collect your information for a particular purpose we will only use it for that purpose, unless you have given us your permission where relevant.
- We will not ask for more information than we need for the purposes for which we are collecting it.
- We will update our records when you tell us that your details have changed.
- We will periodically review your personal information to ensure we do not keep it for longer than is necessary.
- We will ensure that your information is securely disposed of at the end of the appropriate retention period.
- We will observe your rights under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are dealt with promptly and transparently.
- We will train our staff and Board of Trustees on their privacy obligations.
- We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it's held.

## 2. What sorts of information do we hold

- Information which you provide to us such as your title, name, address, telephone number, email address, and any feedback you give to us, including by phone, email, post, or when you communicate with us via social media;
- Information that we receive from other sources. From instance, if your request comes in through the Richmond Council or other such referral agencies, we will correspond with them. They might give us additional information about you. We may use this information on its own or combined with any of the information we receive or collect from you for any of the below purposes.

## Richmond Furniture Scheme

- Information you provide us for recruitment purposes as a member of staff, volunteer or Trustee
  - such as your contact details, date of birth, gender
  - employment and education details
  - health details of yourself or a family member
  - financial information, retirement information and bank details
- Information about the Services that we provide to you (including for example, the things we have delivered to you, when and where, what you paid, the way you use our Services, and so on);
- Information about any device you have used to access our Services (such as your device's make and model, browser or IP address) and also how you use our Services.
- Your contact details and details of the emails and other electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication. We want to make sure that our communications are useful for you, so if you don't open them or don't click on any links in them, we know we need to improve our Services;
- **"Other Information"** is any information that does not reveal your specific identity or does not directly relate to an individual, such as:
  - Demographic information and other information provided by you
  - Aggregated information
  - Browser and device information
  - App usage data

We and our third-party service providers may collect Other Information in a variety of ways, including:

- **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Services (for example, we may aggregate Personal Information to calculate the percentage of our users who call by phone).
- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version
- **Using cookies:** Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively and to collect statistical information.

### 3. How do we use your information?

The information we collect may be used to:

- make available our Services to you;
- to monitor and improve our service offering to you (including via research activities), as well as to notify you of changes to our processes.
- to carry out any obligations we have to you, and provide you with services and information that you request from us
- to provide you with information that you have consented to receive
- to comply with the requirements of our regulators
- as part of a recruitment process, when applicable

- process your orders;
- for the purpose of applying to HMRC for gift aid
- take payment from you or give you a refund;
- help us ensure that our customers are genuine and to prevent fraud;
- for statistical analysis for grant application purposes;
- help us understand more about you as a customer so we can serve you better;
- find ways to improve our Services, and websites;
- help answer your questions and solve any issues you have.
- to provide you with information about products we offer that may be relevant to your circumstances
- to send you administrative information or quality assurance surveys
- For our business purposes, such as data analysis, audits, security and fraud monitoring and prevention (including through the use of closed circuit television and other security systems), developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities
- your demographic information
- your communications with us
- for our internal purposes such as management, research, analytics, corporate reporting to improve business efficiencies;
- comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly and to protect ourselves, our users and customers and to solve any customer disputes;

#### 4. Who we might share your information with

To operate effectively, we may need to pass your information on to selected and trusted third parties. We will require them to comply with privacy principles as part of our contract with them.

The third parties we may share information with are:

- RFS works closely with other councils and community organisations and occasionally needs to share information with them in order to deliver your services. However, RFS will not supply these organizations with your information without your consent.
- RFS will **not** supply your information to any organisation for marketing purposes without your prior consent.
- RFS aims to work to benefit those on low income. In this regard it works in partnership with other agencies such as local charities and council assistance schemes. However, RFS will not supply these organizations with your information without your consent
- Third party Referral Agents who may be considering making a new application on your behalf, where it is appropriate for them to know about any previous grants you have been awarded
- Referees nominated by Education applicants
- any third party to whom you've given your consent
- **Our service providers** We work with partners, suppliers and agencies. We only share information that allows them to provide their services to us or to facilitate them providing their services to you.
- **Other organizations and individuals:** We may transfer your personal information to other organizations in certain scenarios. For example:
  - If required to by law, under any code of practice by which we are bound, or we are asked to do so by a public or regulatory authority such as the Police or the Department for Work and Pensions;

- If we need to do so to exercise or protect our legal rights, users, systems & Services
- In response to requests from individuals (or their representatives) seeking to protect their legal rights or the rights of others.
- to respond to requests from public and government authorities, including public and government authorities outside your country of residence
- to enforce our terms and conditions;
- to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others;

## **5. Security and safe storage of your personal information**

Information supplied by you to us, or that we collect about you, may be transferred, and stored by us, our agents or contractors for the purpose of providing services to you. Once we've received your information, we'll use appropriate procedures and security features to try to prevent unauthorized access. We will do our best to keep your information secure by using password protected software.

## **6. Keeping you informed about our products and services**

From time to time, we would like to tell you about the great events, furniture ideas, new products and services which we think you might be interested in. Where you have consented to us doing so, we may do this through the post, by email, text message, online, using social media or by email. We won't send you marketing messages if you tell us not to, but we may still need to send you service-related messages. If you wish to amend your marketing preferences, you can do so by calling our Administration Officer on 0208 755 4665 or email your request to [admin@richmondfurniturescheme.co.uk](mailto:admin@richmondfurniturescheme.co.uk)

## **7. How long do we keep your information for?**

The periods for which we keep your information depend on the purpose for which your information was collected and the use to which it is put. Data relating to the purchase/delivery are kept for 6 months. Some account information will be held for 3 years from the end of your transaction with us. We will keep your contact information for a reasonable period after your last transaction with us has finished in case you decide to use our services again and may contact you about our services during this time if you have provided consent to marketing.

## **8. Links to other websites**

We sometimes provide you with links to other websites, but these websites are not under our control. We advise you to consult the privacy policy and terms and conditions on each website to see how each supplier may process your information.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through our Social Media Pages.

## **9. Your rights**

### ***Access and correction of your personal information***

You have the right to access the personal information that we hold about you in many circumstances. This is called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free

of charge. Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

If you would like to exercise these rights, you can do so by calling our Administration Officer on 0208755 4665 or email your request to [admin@richmondfurniturescheme.co.uk](mailto:admin@richmondfurniturescheme.co.uk)

***Right to stop or limit our processing of your data***

You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise these rights, you can do so by calling our Administration Officer 0208 755 4665 or email your request to [admin@richmondfurniturescheme.co.uk](mailto:admin@richmondfurniturescheme.co.uk)

## **10.Sharing your thoughts**

When using one of our websites or mobile applications, you may be able to share information through social networks like Facebook and Twitter. For example when you 'like', 'share' or review our Services. When doing this your personal information may be visible to the providers of those social networks and their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## **11.Contact us**

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By calling us on: 0208 755 4665

By email: [admin@richmondfurniturescheme.co.uk](mailto:admin@richmondfurniturescheme.co.uk)

By post: to the address below

If you require further information about the use of your data or wish to make a subject access request for copies of your personal data held by RFS please contact:

*Scheme Manager*

*Richmond Furniture Scheme*

*1a Fortescue Ave*

*Twickenham*

*TW2 5LS*

You also have the right to lodge a complaint with the UK regulator, the Information Commissioner. Go to [ico.org.uk/concerns](https://ico.org.uk/concerns) to find out more.

## **12.Changes to our privacy policy**

We may change our Privacy policy from time to time. Any changes to our privacy policy will be posted on our websites. We will notify you of any substantial changes. Changes are effective when they are posted.