



Policy: Website Cookies and Privacy Policy

Ref: P40.1

Policy as displayed on www.z2k.org

Cookies and your privacy

Z2K uses cookies to collect visitor data and analyse traffic on our site using a cookie, small text file stored on your computer. We use cookies to ensure that we give you the best experience on our website while staying compliant and maintaining your privacy. This information helps us understand how people use our site so we can improve and maintain it. We do not collect, store nor use any personal details of our visitors on these cookies, nor will we be able to identify specific individuals through these cookies without their consent.

Depending on the browser that you use, you can set your preferences to block/refuse cookies, and/or notify you before they are placed.

Some of these cookies are essential to make this Site work properly. Other types of cookie help us to provide you with a good experience when you browse our Site, allow us to improve our Site or allow us to place videos on our Site, or allow us and you to connect to social media sites such as Facebook, Twitter and LinkedIn.

We use three types of cookies on our site:

1. WordPress

This site uses WordPress to publish and display content to you and allow users to interact with the site. WordPress uses data given to us by users for the following things:

- login sessions – when log someone into the site and maintain that logged in state
- email subscriptions – when someone requests to be added to our email newsletters
- comments – when someone posts a comment on the website
- complaints
- donations

2. Google Analytics

We use Google Analytics to collect information about how people use this site so we can improve and maintain it. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. It does not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

http://www.google.com/intl/en_uk/analytics/privacyoverview.html

To know more about cookies, have a look at this web page from Google explaining what cookies are, how they work, and what you need to know about them:

<https://policies.google.com/technologies/cookies>

This site uses the following non-essential third party cookies:

Google Analytics
Youtube
Mailchimp
Stripe
Civist
WPMU DEV

Other video upload services which are used in order for us to link videos in our contents. You can accept or decline cookies at any time. When you use the site without changing your settings, we'll assume that you are happy for the site to use cookies on your computer. If you would like to change your cookie settings, these instructions may be helpful.

Read our full Privacy Policy below.

Monitoring & Review

Date created: October 2020

Date reviewed: October 2020

Date of next review: September 2021

Responsible for Review: Office Manager & Operations Officer

Zacchaeus 2000 Trust (Z2K) Website Privacy Policy

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.

1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

1.3 This privacy policy was last updated on 11 December 2017

2. Credit

2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

3. Collecting personal information

3.1 We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
- (b) information that you provide to us when registering with our website (including your email address);
- (c) information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details);
- (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
- (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
- (f) information relating to any purchases you make of our goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details);
- (g) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts and any peer to peer fundraising pages);
- (h) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication and any information gathered on a form);
- (i) any other personal information that you choose to send to us and
- (j) information relating to any donations you make including your name, address, telephone number, email address, which appeal you are supporting and in the case of direct debits the frequency and date of when direct debits will be taken);

Note – Card details and bank details are collected by the website, but only stored by our payment processors, and not by us.

3.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

4. Using personal information

4.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

4.2 On the basis of our legitimate interest to run our charity, we may use your personal information to:

- (a) administer our website and business;
- (b) personalise our website for you;
- (c) enable your use of the services available on our website;
- (d) send you non-marketing commercial communications;
- (e) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);

- (f) deal with enquiries and complaints made by or about you relating to our website;
 - (g) keep our website secure and prevent fraud;
 - (h) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service);
 - (i) complete the processing of any donation you have made to us;
 - (j) enable us to complete automated decision making and profiling;
 - (k) conduct aggregate analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our charity;
- In order to complete the service you have requested we may use your personal information to:
- (l) [send you goods purchased through our website];
 - (m) supply to you services purchased through our website;
 - (n) send statements, invoices and payment reminders to you, and collect payments from you;
- Where you have given consent we may use your personal information to:
- (o) send you email notifications that you have specifically requested;
 - (p) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
 - (q) send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
 - (r) Your data may also be available to our website provider to enable us and them to carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the follow will apply:

Your data will be made available to our website provider

The data that may be available to them include any of the data we collect as described in section 3 above.

Our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA.

They will store your data for a maximum of [7] years.

This processing does not affect your rights under sections 10 or 16 of this privacy policy

4.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

4.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.

4.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

4.6 All our website financial transactions are handled through our payment services providers, Stripe. You can review the providers' privacy policies at <https://stripe.com/gb/privacy>. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

5. Disclosing personal information

- 5.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers (including specifically the provider and host of our website or other subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 5.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 5.3 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
 - (b) in connection with any ongoing or prospective legal proceedings;
 - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
 - (d) [to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling]; and
 - (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 5.4 Except as provided in this policy, we will not provide your personal information to third parties.

6. International data transfers

- 6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 6.2 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 6.3 You expressly agree to the transfers of personal information described in this Section 6.

7. Retaining personal information

- 7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 Without prejudice to Section 7.2, we will usually delete personal data falling within the categories set out below at the date/time set out below:
- (a) Personal data will be deleted after seven years.
RIT Note: RIT is reviewing its data retention policy in light of GDPR requirements. Currently we hold all data for 7 years unless requested otherwise by clients
- 7.4 Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
 - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

(c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

8. Security of personal information

8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

8.2 We will store all the personal information you provide on our, and where applicable our supplier's, secure (password- and firewall-protected) servers. This may include data storage services provided in the Cloud.

8.3 All electronic financial transactions entered into through our website will be protected by encryption technology.

8.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

9. Amendments

9.1 We may update this policy from time to time by publishing a new version on our website. The "last updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last updated.

9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

9.3 We may notify you of changes to this policy by email.

10. Your rights

10.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

10.2 We may withhold personal information that you request to the extent permitted by law.

10.3 You may instruct us at any time not to process your personal information for marketing purposes.

10.4 In practice, you will usually expressly agree in advance to our use of your personal information for marketing purposes.

11. Third party websites

11.1 Our website includes hyperlinks to, and details of, third party websites.

11.2 This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data

11.3 We operate on a number of social media pages (including Facebook, Twitter, and YouTube). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

12. Updating information

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

13. Cookies

13.1 Our website uses cookies.

13.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

13.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

13.5 We use both session and persistent cookies on our website.

13.6 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

- (a) we use __unam to track users as they navigate the website
- (b) we use cc_cookie_accept to store whether the user has accepted the cookie message or not
- (c) we use ASP.NET_SessionId to validate authenticated users sessions
- (d) we use ARRAffinity to administer the website
- (e) we use MemberLoggedInOR to validate authenticated users sessions
- (f) we use ai_session and ai_user to track users as they navigate the website
- (g) we use DisplayName to keep track of a donors preference to show their name during a Direct Debit

13.6.1 We use Google Analytics to analyse the use of our website.

13.6.2 Our analytics service provider generates statistical and other information about website use by means of cookies.

13.6.3 The analytics cookies used by our website have the following names: [_ga, _gid, _gat, __utma, __utmt, __utmb, __utmc, __utmz and __utmv].

13.6.4 The information generated relating to our website is used to create reports about the use of our website.

13.6.5 Our analytics service provider's privacy policy is available at:

<http://www.google.com/policies/privacy/>.

13.7 Most browsers allow you to refuse to accept cookies. You will find the options in the individual browser under "Privacy" options.

13.8 Blocking all cookies will have a negative impact upon the usability of many websites.

13.9 If you block cookies, you will not be able to use all the features on our website.

13.10 You can delete cookies already stored on your computer.

13.11 Deleting cookies will have a negative impact on the usability of many websites.

14. Data protection registration

14.1 We are registered as a data controller with the UK Information Commissioner's Office.

14.2 Our data protection registration number is Z9971487.

15. Our details

15.1 This website is owned and operated by Zacchaeus 2000 Trust.

15.2 We are registered in England and Wales under registration number 1110841 and our registered office is at Fourth Floor, 79-80 Petty France, London SW1H 9EX .

15.3 Our principal place of business is at Fourth Floor, 79-80 Petty France, London SW1H 9EX.

15.4 You can contact us:

(a) by post, using the postal address given above;

(b) by telephone, on the contact number published on our website; or

(d) by email, using the email address published on our website.

16. Complaints

If you have a complaint about us, or the treatment of your data, you can contact the Charity Commission. The Charity Commission is the independent watchdog for charities.

You can make a complaint about a charity on their website at www.charity-commission.gov.uk.

If you've got a complaint about our fundraising activities you can also complain to the Fundraising Standards Board (FRSB).

To find out whether a charity is an FRSB member and how to go about making a complaint, go to the FRSB public website at www.givewithconfidence.org.uk