



Ethical Fundraising – Outstanding Service

### **Wesser Limited Privacy Policy**

At Wesser Limited we take your privacy seriously and are committed to protecting the security of your personal information.

This Policy explains how we, Wesser Limited, may collect and use the information you give us, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our websites and services, you agree to be bound by this Policy.

If you have any queries about the information in this privacy policy, please:

Email- [communication@wesser.co.uk](mailto:communication@wesser.co.uk) or

Post- Icknield House, Eastcheap, Letchworth, Hertfordshire, SG6 3DE

This Policy contains the following sections:

#### **1. WHO WE ARE**

Wesser Limited is a registered company in England and Wales (company number 06264487).

The information in this Privacy Policy relates to personal information which is obtained by the above entity and for which Wesser Limited is the Data Controller under data protection legislation.

As a service provider, Wesser Limited acts as data processors for our charity partners. Please refer to their privacy policy for further information.

#### **2. WHAT TYPE OF PERSONAL INFORMATION IS COLLECTED FROM YOU**

The personal information we collect from you is limited to what is necessary to enable us to carry out the purposes for which it is collected. The type of personal information we collect depends on the context of your interactions with Wesser Limited and the choices you make, including your privacy settings.

The data we may collect, store and use can include the following:

- Name and contact information. We may collect your personal contact information
- Passwords, password hints and similar security information for authentication and account access.
- Payment information. We collect data necessary to process your pay (following the agreement of an employment contract)

- Collection of financial information for payment of services rendered
- Any personal information which you choose to provide us with in correspondence with you, including telephone number
- Photographs and videos for the purpose of marketing and or identification purposes
- CCTV footage.
- Your I.P. address (or Internet Protocol Address). This is a unique address that computing devices such as personal computers, tablets, and smartphones use to identify itself. An I.P. address is analogous to a street address or telephone number and could therefore be used to identify you.
- We use cookies to identify you when you visit our website and to keep track of your browsing patterns and build up a demographic profile.
- Our use of cookies allows registered users to be presented with a personalised version of the site and have access to information about their account/recruitment information.
- For training and monitoring purposes and area management, we track our fundraising tablet devices with GPS mapping capabilities.

You have choices about some of the personal information we collect. When you are asked to provide personal information, you may decline. Please note that if you choose not to provide personal information that is necessary to enable us to carry out your request- for instance, to apply for a job, we may not be able to fulfil that request.

We may provide links via Wesser Limited's website to other websites. The privacy practices of these third-party websites are outside our control and in these cases you should check their privacy notices before disclosing any personal information.

### **3. HOW WE COLLECT YOUR PERSONAL INFORMATION**

There are various ways you might share your personal information with Wesser Limited, depending on how you interact with us. At present we offer the following channels of communication (though not all may be available to you and will depend on the reason for your contact with us):

- Websites- online application forms
- Paper forms
- Call-centres
- E-mail
- Text
- Face to face

You might send us an e-mail requesting support with a service, and personal information might be collected by us to enable us to deal with your enquiry.

When you contact us through our Recruitment call-centre, telephone conversations with our agents are recorded for training and monitoring purposes.

Some of our premises and vehicles are monitored by CCTV and footage may be captured for security and safety purposes.

#### 4. HOW WE USE YOUR PERSONAL INFORMATION

There are various ways in which we may use or process your personal information. We list these below and the legal basis we rely on in each case.

- a. Consent
- b. Contractual performance

We will process your personal information to perform a contract with you. The contract may be subject to change at any time.

- c. Legitimate interests
- d. *Profiling our existing employees*

We may from time to time profile our existing employee database to ascertain the success of our inbound recruitment channels and activities and regional recruiter performance.

- e. *Processing necessary for us to understand and respond to employees' needs*

We may undertake market analysis and research (including contacting you with employee surveys) so that we can better understand you as an employee and provide improved services for our staff. We will only send marketing communications to you if we have a legitimate interest in doing so.

- f. *Processing necessary for us to promote our business, services and measure the reach and effectiveness of our marketing campaigns*

We may send you marketing information from time to time if you have applied for a job with us or after you have requested other information of interest in a business context. We will only contact you with information about our own services and any other information we believe may be of interest to you (and in ways the law allows). You have the right to object to us sending you this information at any time. Please see section 11 for information on how to do this ('Your Rights in Connection with Personal Information').

We may contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us.

We may process your personal information to identify and record when you have received, opened or engaged with our website or electronic communications (please see Section 12 ('Use of Cookies') for more information).

We may process your personal information to administer competitions or promotions that you enter whilst working with us or applying to work with us.

#### *4.1 Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively*

We may have to share your personal information with third parties, as described in section 6 ('Data Sharing') below for reasons such as payroll.

We may have to verify the accuracy of information that we hold about you and create a better understanding of you as a customer/employee.

We may process your personal information for network and information security purposes, for example, in order for us to take steps to protect your information against loss, damage, theft or unauthorised access.

We may process your personal information to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request).

We may process your personal information to inform you of updates to our terms and conditions and policies.

We may process your personal information in order to effectively carry out investigations.

#### *4.2 Processing necessary to protect our premises, property and people*

We may process personal information for crime prevention and detection purposes and to keep our people safe. For example, some of our premises have CCTV cameras.

#### *4.3 Legal obligation*

We may process your personal information if we are required to do so by law.

#### Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in accordance with this Policy, where this is required or permitted by law.

## **5. YOUR RIGHT TO OBJECT TO PROCESSING OF PERSONAL INFORMATION**

You have the right to object to specific processing at any time. To object to the processing of your personal information, please contact - [communication@wesser.co.uk](mailto:communication@wesser.co.uk) or post- Icknield House, Eastcheap, Letchworth, Hertfordshire, SG6 3DE.

As quickly as possible and in any event within 30 days of receiving notification that you have objected to processing, we will no longer process your information for the purpose or purposes you originally agreed to (unless we have another legitimate basis for doing so in law). Please note that if you ask us to stop sending marketing information we will update our records to stop further mailings as quickly as we can, but you may still receive further mailings which were already in progress prior to your asking us to stop for up to 2 months.

The objection to processing will not affect the lawfulness of our processing based on legitimate interest before you objected to processing.

## **6. DATA SHARING**

We will not sell or rent your information to third parties.

We may have to share your data with third parties, as described below. If we do, you can expect a similar degree of protection in respect of your personal information to that provided by us. We require third parties to respect the security of your data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may pass your personal information to our third-party service providers, including contractors and designated agents, and other associated organisations for the purposes of completing tasks on our behalf (for example to process payments or to assist us with marketing analysis). However, when we use third party service providers, we disclose only the personal information that is reasonably necessary to deliver the service. Third- party service providers must adhere to our data processing agreements at all times.

## **7. PROFILING**

We may from time to time profile our existing employee database to ascertain the success of our inbound recruitment channels and activities and regional recruiter performance.

## **8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR**

We will only retain your personal information for as long as necessary for the purposes we collected it for, as set out in our Data Retention Schedule and our data processing activities, including for the purposes of satisfying any legal, accounting or reporting requirements including statistical analysis. To determine the appropriate retention period for personal information, we consider the

amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

For further information about the retention period in a particular case, please contact [communication@wesser.co.uk](mailto:communication@wesser.co.uk) or post- Icknield House, Eastcheap, Letchworth, Hertfordshire, SG6 3DE.

## 9. HOW WE KEEP YOUR DATA SAFE

Wesser Limited would like to reassure you that we use appropriate security measures to protect your personal information against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures may include, but are not limited to, a range of organisational and the following technical safeguards listed below. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

- Encryption

Encryption is the process of converting data to an unrecognizable or "encrypted" form. This means that only the sender and intended recipient can view it in a meaningful way. If the encrypted data is stolen, it should not be possible to change it back to readable data.

- Anonymisation

We will anonymise data upon request and once it has surpassed its data retention period.

- Certification from third parties

We engage security experts to test or confirm that our systems meet relevant security standards, including penetration testing.

- Secure log on/authentication

As well as requiring staff to enter usernames and passwords, our systems also check that a particular computer or program is authorised to access and use the data before allowing it to do so.

- Access controls and role based access controls

Staff are prevented from accessing our systems unless they enter their user name and password. In addition, we restrict whose personal data each user can access depending on their role at Wesser Limited. Where personal data may be found on a hard copy, copies are stored in an appropriate filing cabinet that is locked and only accessible to relevant parties. We also limit access to your personal information to those agents, contractors and other third parties who have a business need to know. Everyone with access to your personal information are subject to a duty of confidentiality and will only process your personal information on our instructions.

- Data back-up and restoration

We regularly back-up our systems and data which means that we can restore or recover the system and data from a back-up file. Back-ups are securely kept onsite and offsite.

- Network controls

We protect our network by using Firewalls that only allow access between different networks based upon strict security criteria.

- System testing and monitoring

We regularly test whether our systems are secure and safe. We also engage independent companies to test whether our systems are secure through penetration testing. We regularly monitor our systems for signs of hacking and attacks and we use anti-virus software to detect and prevent computer viruses. Wesser Limited is Cyber Essentials Plus certified.

- Mobile Device Management

The data on our Tablets are encrypted to ensure the security of the personal data.

## **10. CHANGES TO YOUR PERSONAL INFORMATION**

Please let us know if your contact information changes so that we can ensure that our records are accurate and up to date. You can request that we change your contact details by contacting [communication@wesser.co.uk](mailto:communication@wesser.co.uk) or post- Icknield House, Eastcheap, Letchworth, Hertfordshire, SG6 3DE.

## **11. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION**

By law you have the right to:

- Request access to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - Data subjects must make a formal request for information we hold about them. This must be made in writing or electronically to the HR department. Employees who receive a written request should forward it to their line manager immediately.
  - Wesser Limited reserves the right to charge a fee to the data subject if the request is deemed to be 'manifestly unfounded or excessive'. As the data controller, Wesser Limited may charge a reasonable administrative-cost fee if further copies of the requested data are requested.
  - Wesser Limited may find a request to be 'manifestly unfounded or excessive and involve disproportionate effort'. In such a case, Wesser Limited reserves the right to charge a fee or refuse to respond. In such a case, Wesser Limited will provide evidence to the data subject of how the conclusion that the request is manifestly unfounded or excessive was reached and that they have taken all reasonable steps to comply with the request.

- Wesser Limited reserves the right to withhold personal data if disclosing it would adversely affect the rights and freedoms of others.
  - Our employees will refer a request to their line manager [or the Data Protection Compliance Manager] for assistance in difficult situations. Employees should not be bullied into disclosing personal information.
  - Where the controller processes a large quantity of information concerning the data subject, Wesser Limited reserves the right to be able to request that, before the information is delivered, the data subject specify the information or processing activities to which the request relates.
- Request correction of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
  - Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
  - Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for process it.
  - Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please request at: [communication@wesser.co.uk](mailto:communication@wesser.co.uk) or post- Icknield House, Eastcheap, Letchworth, Hertfordshire, SG6 3DE.

We will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

As part of the service level agreement with our charity partners, if there is a Subject Access Request from a supporter, Wesser Limited will comply with our charity partner's Subject Access Request Policy.

## 12. USE OF COOKIES

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on <http://www.allaboutcookies.org/>

We use cookies to identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile.

Our use of cookies also allows registered users to be presented with a personalised version of the site and have access to information about their account.

Most browsers will allow you to turn off cookies. If you want to know how to do this please look at the menu on your browser, or look at the instruction on <http://www.allaboutcookies.org/> Please note however that turning off cookies will restrict your use of our website.

### 13. ORGANISATION CONTACT

Organisation Name: **Wesser Limited**

Registration reference: **Z1447137**

Email: [communication@wesser.co.uk](mailto:communication@wesser.co.uk)

Telephone: 01462 704 860

Address: Wesser Limited, Icknield House, Eastcheap, Letchworth, Hertfordshire, SG6 3DE.

Any activities undertaken on behalf of our charity partners are subject to the requirements set out in their individual privacy policies. Please refer to their respective websites for further information.

### 14. RIGHT TO MAKE A COMPLAINT

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Call: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)