Habitat for Humanity Great Britain's Privacy Notice

This Privacy Notice explains when and why we collect personal information about you, how we use it and the conditions under which we may disclose it to others. Your personal data is defined as any information that can directly or indirectly identify you. This notice also explains how we keep your data safe and secure and includes information you need to know about your rights and how to exercise them.

If you have any questions regarding our Privacy Notice and our use of your personal data, or would like to exercise any of your rights, please get in touch via the following information:

Email us: hello@habitatforhumanity.org.uk.

Telephone us: 01753 313539.

Write to us: Habitat for Humanity Great Britain, 268 Bath Road, Slough, SL1 4DX.

Data Protection Officer: Nesar Khan – External DPO at Hope & May (nesar.khan@hope-

may.com)

If you are unhappy with the way we process your data, please get in touch by using one of the contact methods above.

You can also make a complaint to the <u>Fundraising Regulator</u> or the Information Commissioner's Office (ICO) which regulates the use of information in the UK. They can be contacted by:

Telephone 0303 123 1113

Write to the ICO: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Or by going online to www.ico.org.uk/concerns

If you are based outside of the UK, the complaint should be directed to the relevant Data Protection Supervisory Authority in that Country.

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1. Who are we?

We are Habitat for Humanity Great Britain and for the purposes of UK Data Protection Law we are registered with the ICO under registration number Z9598276. Our purpose is to build homes, partnerships, communities and networks in order to alleviate housing poverty and homelessness.

In this Notice, 'Habitat for Humanity Great Britain', 'we', 'us', 'our' means:
Habitat for Humanity Great Britain (charity registration number 1043641) with a registered address at Habitat for Humanity Great Britain, 268 Bath Road, Slough, SL1 4DX.

2. Personal data collected, how and why we collect it, and on what lawful basis

Appendix 1 – Human Resources (employees, trustees, job applicants and volunteers)

Appendix 2 – Service Users

Appendix 3 – Fundraising

Appendix 4 – Website visitors and cookies

3. Fundraising and Marketing Communications

Your contact details may be used to provide you with information about our services or our fundraising opportunities via:

Post

We may use your Consent or our Legitimate Interests to send you fundraising or marketing communications by post. If you prefer not to hear from us in this way, please get in touch by using any of the contact details listed at the top of this notice.

Phone

If you have provided us with your telephone number we may contact you by phone with fundraising and marketing communications under our legitimate interests (unless you are enrolled to TPS or you have told us not to do so).

• Email, text or other electronic message

We will only send you fundraising and marketing communications by email, text or other electronic message if you have provided your consent, or if you have been involved in a commercial transaction with us. You may opt-out of our fundraising and marketing communications at any time by clicking the unsubscribe link at the end of our e-marketing communication. Alternatively, you can let us know by using any of the contact details listed at the top of this notice.

4. Your Rights

Under data protection laws in the UK and EU, you have certain rights over the personal information that we hold about you. If you would like to exercise your rights, please get in contact with any of the details listed above. Here is a summary of the rights we think apply:

a) Right to be Informed

You have the right to be informed as to how we use your data and under what lawful basis we carry out any processing. This Privacy Notice sets this information out however if you would like further information, please get in touch.

b) Right of Erasure – also known as the right to be forgotten

You may ask us to delete some or all of your information we hold about you. Sometimes where we have a legal obligation, we cannot erase your personal data.

c) Right to Object

You have the right to object to processing where we are using your personal information such as where it is based on legitimate interests or for direct marketing.

d) Inaccurate personal information corrected

Inaccurate or incomplete information we hold about you can be corrected. The accuracy of your information is important to us and we are working on ways to make this easier for you to review and correct the information that we hold about you. We will also carry out an annual accuracy check. If any of your information is out of date or if you are unsure of this, please get in touch through any of the contact details listed in this notice.

e) Right of restriction

You have a right to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we are not lawfully allowed to use it.

f) Right to Access your information

You have a right to request access to a copy of your personal information that we hold about you, along with the information on what personal information we use, why we use it, who we share it with, how long we keep it for and whenever it has been used for automated decision making. You can make a request for access free of charge and proof of identity is required.

g) Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right to question the outcome of automated decisions that may create legal effects or create a similar significant impact on you. We currently do not undertake automated decision making.

h) Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you.

i) Right to withdraw consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data

5. Transferring your information outside of the United Kingdom

Where personal data is stored outside of the UK and the EEA, safeguards to protect personal data may include but are not limited to the UK Addendum used in conjunction with the EU

Standard Contractual Clauses (SCCs), or UK International Data Transfer Agreement (IDTAs). Such safeguards will be subject to Transfer Risk Assessments (TRAs).

1. APPENDIX 1 – Human Resources

Job applicants and current and former employees, trustees, contractors and volunteers

How and when do we collect information about you?

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your employment/engagement.

In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references.

What types of information is collected about you and who provides it?

We keep several categories of personal data on our employees/contractors/job applicants/trustees and volunteers in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each individual and we also hold the data within our computer systems, for example, our holiday booking system.

Specifically, depending on your type of engagement with Habitat for Humanity Great Britain we may process the following types of data:

- a) personal details such as name, address, Date of Birth, phone numbers
- b) name and contact details of your next of kin
- c) your photograph, your gender, marital status
- d) footage of the organisation events where you may appear
- e) information of any disability or other medical information you have disclosed
- f) right to work documentation
- g) information gathered via the recruitment process such as that included in a CV, cover letter or application form, references from former employers, details on your education and employment history etc
- h) National Insurance number, bank account details and tax codes
- i) information relating to your employment with us (e.g job title, job description, salary, terms and condition of the contract, annual leave records, appraisal and performance

indication, formal and informal proceedings involving you such as letters of concern and disciplinary, disciplinary and grievance proceedings.

- j) internal and external training modules undertaken
- k) information on time off from work including sickness absence, family related leave etc
- I) IT equipment use including telephones and internet access
- m) your biography and picture for the website (if applicable).
- n) ID documents like passport, driving licence, utility bills and birth certificate.

We may also process special category data which include health information, sexual orientation, race, ethnic origin, political opinion and religion. . We may also process criminal records information if the role involves DBS checks.

How is the information used?

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment or your volunteer/trustee agreement, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative tasks, legal obligations and/or contractual agreement obligations. We process information in relation to the DBS for our safe recruitment practices.

If you volunteer with us

If you are participating in an international volunteering trip, we will require some personal information from you. This information will be shared with our carefully selected and monitored Team Leaders, who are volunteers, and Habitat for Humanity staff based in the destination country. This is for the sole purpose of managing the build and ensuring we can keep you healthy and safe whilst under our care.

After the completion of the build, volunteers will not retain your personal details. Habitat for Humanity Great Britain will securely retain your details for as long as necessary in order to meet legal and health and safety obligations.

Lawful basis for processing

We mainly use 'contractual obligation' as a lawful basis for processing personal data for employees, job applicants and freelancers. We mainly use legitimate interests for trustees

and volunteers. We may also have legal obligations to process and share your data, for example we need to share salary information to HMRC or use some of your data to enrol you on a pension scheme.

We may rely on our legitimate interests for processing activities such as keeping supervision and appraisal records; using your image, bio and videos/pictures of the organisations' events where you may appear on our website or marketing/fundraising materials to promote the charity.

Some special categories of personal data, such as information about health or medical conditions is processed in order to carry out employment law obligations (such as those in relation to colleagues with disabilities and for health and safety purposes). We may also process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief for the purposes of equal opportunities monitoring. When processing criminal records (for example, in order to perform DBS checks), the organisation relies on the lawful basis of legitimate interest. When processing special category data and criminal records, we rely on additional conditions of the UK GDPR and DPA 2018.

How long do we keep your data?

We only keep your data for as long as we need it for, which will be at least for the duration of your employment/engagement with us though in some cases we will keep your data for a period of 6 years after your employment/engagement has ended. If you've applied for a vacancy but your application hasn't been successful, we will keep your data for 12 months.

Some data retention periods are set by the law. Retention periods can vary depending on why we need your data. Please get in touch by contacting us using the details above if you want to know more about retention period.

Data is destroyed or deleted in a secure manner as soon as the retention date has passed.

Confidentiality - who do we share your data with?

Data in relation to your salary is shared with HMRC as part of our legal obligation. Data may be shared with third parties for the following reasons: for the administration of payroll, pension, HR functions (for example the online holiday booking system). When sharing information with third parties, we have data sharing, processor agreements or contracts in place to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

2. APPENDIX 2 – Service Users

How we collect information about you?

You deserve to know how we use your details and why. Depending on how you interact with us, the way in which we process your information will vary. Some of this is required, i.e. donations and gift aid, and some is optional, i.e. direct marketing.

From 25 May 2018, you will not receive direct marketing materials from us unless you have opted in, or you are a supporter of our work and we therefore believe we have a legitimate interest in contacting you.

Occasionally we will seek to better understand our supporters and how we can best serve you. To do this, we might analyse the data you have provided to us to create a picture of trends and interests that can better inform our communications. This may include postcode analysis, as well as analysis of areas of our work you are most interested in, your feedback and comments, responsiveness to our communications, etc. However, any data used in this way will be anonymised for these processes and we will not add any data that you have not provided us to your record (this is also known as datamatching or telematching).

When we receive large donations we may do additional research to ensure that the source of the money is aligned to our values as an organisation.

If you are participating in a challenge event for us

We work with Run for Charity to offer discounted ballots to UK and international challenge events. When you register with us we will share you details with Run for Charity who will work directly with the organisers of your chosen challenge event to ensure you can successfully participate and to ensure your health and safety. We will contact you in the run up to the event with regard to fundraising and training. Run for Charity and the event

organisers will also contact you directly with race day details and other important information.

For our signature event, Hope Challenge, we will share your registration details with the organisers, Across the Divide, in order to ensure our health and safety obligations throughout the event. Habitat for Humanity Great Britain will retain your details for as long as necessary in our secure database so we can meet our legal and our health and safety obligations.

Information collected during your participation

We may take footage of our events for marketing and communication purposes where you may appear.

The information collected may include special category data which include health information, sexual orientation, race, ethnic origin, political opinion, religion, trade union membership, genetic and biometric data. They may also contain criminal records information.

If you are signing up for support through our programmes or project work

We work alongside trusted third parties to provide certain support services to individuals in need. If you are signing up to receive such support, you acknowledge that your personal data will be processed by HFHGB in line with this notice and UK Data Protection Law. Your personal data may also be processed by trusted third-party suppliers, such as Argos, where goods are purchased on your behalf by HFHGB to support you. You should also refer to the privacy notices of these partners/suppliers to understand how they process your personal data.

The information processed as part of our project work may include special category data which include health information, sexual orientation, race, ethnic origin, political opinion, religion, trade union membership, genetic and biometric data. They may also contain criminal records information.

If you are receiving updates on our work

You are making an impact on the global housing crisis and we want to let you know about it. We provide these updates by sending direct marketing materials through the post and by email. These updates include:

- Newsletters and Appeals,
- Volunteering and Event Updates, and
- Campaign and Advocacy Updates.

You can choose what you receive from us and how you receive it. And you can always change your mind.

Communicating with you

We like to keep our supporters informed about our latest activities and accomplishments.

We promise to be clear about how we will communicate with you. If you do not want to be contacted, or prefer not to be contacted in certain ways, we will honour that.

You can update your preferences with us at any time on our <u>website</u> or by calling our supporter services team at 01753 313539.

Suppliers we work with

We have limited resources, so we work with external suppliers to help us communicate with and provide support to you.

We use carefully selected suppliers to help us deliver our mailings and project work. We will keep your information safe and only use your details in the ways you've agreed.

When necessary, we may share data with our carefully regulated and monitored external suppliers and/or delivery partners, for processing purposes relating to project support or to help us improve our communications with our supporters. This information is shared on the basis of our legitimate interests and we will ensure their use of the data is in line with our own data protection policies and not kept or used by them for any other purposes.

We will only work with professional organisations that we have vetted and ensured meet our data protection standards. You have the right to view, request and delete your personal data held by any of our suppliers and/or delivery partners.

How is your information used?

We may use your personal information to

- Protect yourself and the general public;
- Safeguarding;
- Conduct evaluation;
- Collate anonymised or pseudonymised statistical information for funders, the charity and delivery partners

Lawful basis for processing

We rely on legitimate interests as our lawful basis for processing your personal data.

When we process special category data and criminal records, the lawful basis is supported by additional conditions of the law.

How long do we keep your data for?

Personal data is currently stored and deleted in line with Habitat for Humanity GB's retention policy.

Confidentiality, data sharing and safeguarding

- We may use legitimate interests to share your personal data with trusted delivery
 partners in order to provide you with a quality service which best suits your needs. Each
 organisation acts as individual data controller of your personal information and you
 should read their privacy notice in addition to this one.
- Personal data are not shared with funders. Information to funders are shared only anonymously.

To comply with our duty of care and safeguarding, we may need to pass some information raising safeguarding concern with the authorities. In such circumstances, we apply vital interest and legitimate interest as our lawful basis. Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed in these circumstances. Exceptions and exemptions are applied on a case by case basis.

3. APPENDIX 3 – Fundraising

Information collected and why, who provides it, data retention and lawful basis

When you make a donation

When you make a donation to Habitat for Humanity Great Britain, we will collect your details so that we can process the payment, claim gift aid (if applicable) and thank you for your gift. The information gathered may be: name, email address, Gift Aid sign up, company name if donation made by an organisation, donation details, reasons to engage and postal address.

This information allows us to process your donation, and deal with any potential enquiry. We rely on our legitimate interest to process this data. If you agree that we can claim Gift Aid on your donations, we are legally required to keep a record of the claim and your Gift Aid declaration.

We will retain your details in our secure database in order to meet our legal and financial obligations, and to provide you with further information about our work, based on your consent or our belief that you would like to receive updates about our work and further opportunities to support it. This information will not be made available to anyone outside of Habitat for Humanity Great Britain.

We are happy to answer questions you may have about how your donation is spent. If you wish to designate your gift to a location or programme, we will do our utmost to honour that request. If it is not possible to designate your gift in the manner requested, we will let you know why and work with you to redirect your gift.

Donations made in support of volunteers who are participating in challenge events or international builds are made directly to Habitat for Humanity and not the individual participating. In the unlikely event that a Build or challenge has to be cancelled, we regret that we cannot offer refunds on donations. Your donation will be used to help families around the world.

When you sign up to our fundraising events

Information is mainly provided by you via our website forms, via third party platforms (e.g Eventbrite) or in person during the events by paper forms. The information gathered may be: name, email address, company name if applicable, donation/payment details, reasons to engage, postal address, email address and contact preferences

This information allows us to administer your sign up, process payments, and deal with any potential enquiry. We rely on the legitimate interest lawful basis to process this data.

During these types of events, we may also take photographs and video recordings of people attending where you may be included. This information allows us to showcase our work and have effective external communications. We rely on our legitimate interest to process this data.

If you are signing up to an event using a third party, please also refer to the privacy notice published on their websites.

When you show interest in supporting us (e.g through a gift in your will or a pledge) and you decide to contact us

Information is provided mainly by yourself, via online forms or phone/email conversation with us. The information gathered may be: occupation, title, details of any correspondence had with ourselves, date of birth, fundraising appeals responses, event participations with us and details of your reasons to engage with us

This information allows us deal with your enquiry and show you how to get engaged. We rely on our legitimate interest to process this data.

Philanthropy

In case of a generous donation or in order to identify potential high value supporters, we may use profiling and screening techniques. We may undertake in-house research and from time to time engage specialist agencies such as Prospecting for Gold to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

We would gather publicly available information regarding previous charity support, connection to our cause, credibility, geographical, demographic, financial soundness, career information, peer networks and other publicly available information (e.g. age, address, listed Directorships, hobbies and interests).

If you have already engaged with us, we may also profile information that you have provided to us during your engagement, including information such as occupation, title, details of any correspondence had with us, DOB, fundraising appeals responses, event participations with us, details of your reasons to engage with us.

We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations.

This information also allows us to understand how likely it is that you would be interested in supporting us so that we can better tailor our communications such as telling you about the things you are likely to be interested in, letting you know of ways to fundraise with us which are relevant to you and making sure that we only talk to you about a financial level of giving that is appropriate to you.

We rely on our legitimate interest in order to profile and screen your information. If you would rather we did not do this, please just let us know and we will, of course, respect your wishes. Otherwise, following our initial profiling and screening, we will contact you either via phone or via e-communication if consent has been provided. During our conversation, we inform you of our processing and of your rights as data subject (which include right to object, to restrict our processing and to have your data deleted). If you are happy to engage with us, we'll proceed with establishing our relationship with you, which will include further engagement and profiling.

Additionally, we sometimes ask existing supporters, trustees and volunteers whether they would be prepared to open their networks up to us. An existing supporter may tell us about an individual previously unknown to us and facilitate an introduction. In this scenario we would check that the person in question is registered on the TPS or FPS and exclude them if their details have been registered on either of these registries. We would then advise our Trustee or existing supporter about our data responsibilities and ask them to ensure that the person they would like to introduce to us is happy for an introduction to take place. Following the introduction, we would direct the individual to this privacy notice and confirm their marketing consent preferences before communicating with them further. We will also share a link to our privacy notice in the footer of all of our email communications.

How long do we keep your data for?

We keep your data as long as necessary. If you've made a donation, showed interest in supporting us or participated in our events we may keep your data for up to 6 years. If you are a regular donor, we may keep your data for up to 6 years once you've stopped engaging with us.

Data is destroyed or deleted in a secure manner as soon as the retention date has passed.

If you wish to know more about our data retention, please contact us using the details above.

Confidentiality - who do we share your data with?

Please rest assured that we will never sell your details to any third party.

In addition, if we ever need to send data to a third party for processing for the purposes of legitimate interests (for example checking against the Telephone Preference Service, updating our records and prospect researching from publicly available sources such as the electoral roll) we will make sure the company we use has signed a data processing agreement with us or other contractual obligations, so that they are bound to take care of your data in the same way we do. We may also share personal information with external auditors, e.g. the Charities Commission or for the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

If you have made a Gift Aid declaration, we may disclose the information you have provided as part of the declaration to HMRC for the purpose of reclaiming gift aid on your donation(s). We may share or disclose your personal information if we are required to do so by any law, regulation or court order.

4. APPENDIX 4 – Website visitors and cookies

Website Cookies

For more information about our website cookies, please see here: https://www.habitatforhumanity.org.uk/privacy-policy/

Social Media

When you interact with us on social media platforms such as LinkedIn, we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms. Please review the privacy notice of those platforms, in addition to this one.

Formstack

We use Formstack to create online forms that:

- Capture new subscribers to our e-newsletter and offline communication (postal, phone)
- Register service users who wish to receive support through our programmes and projects
- Register individuals for volunteer trips and challenge events
- Receive online donations and payments
- Receive feedback on our volunteer trips and events

All the data captured in the forms is stored by Formstack on their servers. Formstack complies with the EU-US Privacy Shield Framework regarding the collection, use, and retention of personal information transferred from the European Union to the United States. You can learn more about the Privacy Shield Framework here. The data is retained for as long as necessary for us to manage our legal obligations.

Links to other websites

Our website may contain links to other websites of interest. Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

Changes to our Privacy Notice

This privacy notice is kept under regular review. If we make any significant changes to the way in which we process your information, we'll make the required changes to this Privacy Notice and will notify you so that you can raise any concerns or objections with us. When making less impactful changes, we'll update this notice and post a summary of the changes on our website.

This privacy notice was last updated in October 2025.