



# Data Protection and Privacy Policy

Reviewed and adopted December 2020  
and updated Jan 21  
Next review due November 2022

## Policy Statement

Read for Good takes the lawful and correct treatment of personal information very seriously to ensure the trust and confidence of those with whom we work, in line with the “GDPR” rules which now that we have left the EU have been incorporated into The Data Protection Act 2018 (DPA 2018).

We also adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998, and ensure the following:

- Undertake fair collection and use of information
- Specify the purposes for which information is used
- Collect and process only the appropriate information that is required for the successful operation of our work
- Optimise the quality of information used wherever possible
- Protect the rights of people about whom information is held:
  - The right to be informed that processing is being undertaken
  - The right of access to one’s personal information
  - The right to prevent processing in certain circumstances and
  - The right to correct, rectify, block or erase information which is regarded as wrong information.
- Take appropriate security measures to safeguard personal information:
  - All staff shall use strong, secure, passwords on all their devices and on the appropriate platforms and files, which no-one else will know
  - Data will never be shared via an unprotected medium i.e. USB memory stick
  - At the end of the day all papers with personal data will be locked away or securely disposed of.
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information.

At Read for Good, we value your support and we are committed to protecting your privacy in line with GDPR. We want to help you understand how we use the information we hold about you and how you can get in touch with us about your preferences. Please read the information below to find out more.

Any data received and stored from individuals or organisations outside of the UK (e.g. British schools overseas, International Schools or donors residing overseas) will be governed and treated in the same way as UK data as set out in this policy.

## **Who are we?**

We are registered as a Charity in England and Wales, and our registration number is 1130309 (England and Wales) and no. SC041036 (Scotland).

We are registered as a data controller under the terms of the Data Protection Act (1998), and our Data Protection Register number is: Z3405887. Any electronic communications will be made in accordance with the Privacy and Electronic Communications (EC Directive) Regulations 2003.

## **What information do we collect?**

We collect the personal information you provide us with as part of the online sponsored read kit order process, through donation and sponsorship forms, information requests, surveys and meetings with our staff. If provided, we also collect and store how you want to hear from us (your contact preferences) which we may use to contact you until we are notified otherwise.

The detail of the information you provide us varies depending on your use of the Read for Good website but the majority of our order and donation processes require you to supply us with your title, name, postal address, email address and telephone number.

We also collect and hold information about the contact you make and activities you take part in with Read for Good. This may consist of, but is not limited to:

- Order details
- Donation and sponsorship details
- Direct Debit details (where applicable)
- Gift Aid status
- Details of correspondence sent to you or received from you
- Responses to surveys sent to you
- Event registration/attendance
- Any other information provided by yourself that is relevant to your relationship with Read for Good to ensure that we provide the best possible level of support as and when required.

In addition, through our tool Track My Read, we collect anonymised pupil reading data. This tool is designed to motivate children to read for pleasure, and provide reading insights to the school. There is further information on this specific tool below.

## **Why do we collect this information?**

We collect personal information from you to enable us to process your sponsored read kit and administer your sponsorship money / donations correctly, and to help us build a positive relationship by contacting you in a way that is personal and relevant to you. This also helps Read for Good to be as efficient as possible in using its resources when contacting schools and supporters for marketing and operational purposes.

We use the data you provide us with in combination with the contact permissions you agree to at the time of supplying your data. You can change your contact preferences at any time by contacting us directly. There are occasions where we are required to collect your email and telephone number to complete an operational process on our website. In these cases we will direct you to the option to opt in to marketing communications from Read for Good to make the process of subscribing as quick and easy for you as possible.

There are some communications that we are required to send regardless of your contact preferences. These are essential communications, deemed necessary to fulfil our administrative obligations to you. This includes kit order confirmation emails, Direct Debit confirmations and advanced notices, thank you letters, Gift Aid confirmation letters and emails querying returned mail, incomplete cheques or bounced Direct Debit payments with you. If you order a kit we may, from time to time,

contact you to help you fulfil your Readathon. By ordering a kit you are indicating that you are intending to carry out a Readathon; as stewards of the donations and sponsorship money that we receive from schools, charitable individuals and other organisations, we have a vested and legitimate interest in ensuring that kits that are ordered are completed wherever possible.

### **Gift Aid**

In order to claim Gift Aid on your donations from the HMRC, we need to hold records of your name and address, your tax status and donation details. Ensuring this information is accurate means that we claim Gift Aid correctly and can increase the value of the donations you give to us.

### **Financial Audit**

We need to hold information about donations that you give to us to meet financial auditing requirements but also to help us understand how you support Read for Good so that we can talk to you about our work and how we can support you and your school, in a way that is relevant to you.

### **Areas of Interest**

We may hold information about your particular areas of interest so we can send information to you about those aspects of our work. This could include entering a specific competition or requesting information about specific events or our work in specific locations.

### **Address Information**

We hold your address details so that we can occasionally send you information via the post. This could be for operational purposes (for example, when contact is required to process an order or donation but where no additional contact information was supplied) and / or for marketing purposes depending on the permissions you supply us. We will also hold your address information on our database so that if you request us to no longer contact you, we can keep a record to ensure we do not include you in any mailings in the future.

### **What do we do with your information?**

All the information we keep is stored on a secure database held via Salesforce, our database provider. If you donate from outside of the UK, your data is stored on this system in the UK office.

Depending on your relationship with Read for Good, and the preferences you have indicated, data we hold may be used by us for the following purposes:

- Sending you promotional, marketing or fundraising information by post, telephone or electronic means.
- Follow-up communications following the order, delivery and/or receipt of a sponsored read kit.
- Fundraising appeals or to ask you to consider supporting us in other ways such as taking part in events.
- Informing you of other activities, or events related to Read for Good such as publisher and author partnerships.
- Data screening and cleansing, to check if we have accurate contact details for you.

We consistently review our records to ensure they are as accurate as possible. We may consult alternative sources in order to undertake these checks such as GOV.UK or specialist data suppliers. This allows us to ensure that we maintain contactable records for schools where teachers, librarians, etc. who have previously ordered a kit via our website but have left the school.

Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an email from us is opened and/or how many links are clicked within the message. The data from this tracking is generally used in an aggregated and anonymised form.

We may use existing data about your previous engagement with Read for Good to find relevant information to tailor communications and to ensure that you receive the best possible service from us. An example might be that your school has previously ordered a sponsored read kit for a specific term but that date has passed and we have received no indication of the kit being used. As a result,

we may prompt you to update us with your plans so that we can ensure that we provide you with the best possible level of support, at the right time for you, to ensure that your school has all the tools and resources it needs for a successful sponsored read.

We may use your data to help us understand our donors and potential donors. This allows us to more cost effectively manage our communications and resources to ensure we dedicate our time and resources to best match the needs of our business and to best steward the donations and sponsorship money you send us.

If you do not want Read for Good to do research or profiling work in relation to your information, you can contact us directly to confirm. Please rest assured however that where possible this information is anonymised so cannot be matched back to an individual's personal contact information.

Finally, Read for Good's trustees have a duty of due diligence to ensure that there is no reputational or other risk to the organisation in accepting a gift or other support. We may therefore need to carry out research which is necessary to ensure we comply with this duty. For more information on the type of information required and the circumstances when this might apply, you can [visit this Charity Commission link](#).

## **Track My Read**

Track My Read is a tool designed to support schools in motivating children to read for pleasure. It provides pupil reading insights to the school.

Individual pupil data is not shared with, and is not accessible by, Read for Good. Only the person that uploads the data can access individual pupil data, via the password-protected Track My Read account.

The technology used for Track My Read is Google's Firebase. When data is uploaded, it is stored in Google Firebase databases - [see more information here](#).

- Once pupil data is uploaded, each pupil is given an auto-generated, anonymous Reader ID, which is shared with Read for Good.
- There are security rules in place which mean that only the user that originally uploaded the pupil data is allowed to read the pupil names.
- The Google log-in is only used to identify the person using the tool, and allow them to access their school's data.

Pupils' first names, last names and class or year group are uploaded to Track My Read. This creates a unique URL link for each participating pupil. This link becomes the pupil's login and their way to record reading sessions, so there is no need for pupil user names, emails or passwords.

Read for Good sees anonymised reading data which means we see the reading sessions but we have no named pupil data, and nowhere in our system does it associate a name with the reading data. We cannot access the pupil name data that you enter.

There is a public dashboard to share with parents and pupils but it doesn't show any individual data. This public dashboard can be enabled or not.

## **How do you provide your preferences to Read for Good?**

When we ask you for your personal information, we endeavour to let you know why we are asking for your data and how we will use it. We do this in the form of a short information notice on all our printed and online forms which directs you towards this Privacy Policy. Where applicable, and deemed necessary by data regulation, we will ask you for your explicit consent to use any of the

details you have provided. You can change how we use the information you have provided to us at any time by letting us know your preferences.

For example if you provide us with your telephone and email address by completing those details in an online form, the information notice will state that your personal information is being collected and, if applicable, to what end.

If you provide us with your personal information via a printed form posted directly to our offices, it will be managed manually with the utmost discretion and a commitment to treating your data with care to ensure its privacy. If you have confirmed via one of these printed forms that you would like to receive email or postal marketing communications from us we will manually record this information into our database management system. If, at a later date you would like to change your preferences, you can do so by contacting us directly via post, telephone or email.

### **More information about your data**

Our website is a safe environment for anyone who visits. As such, donations made to us online are secure. When you make a donation online, we ask for your name, address, e-mail address, and debit / credit card information.

We use your information to process your donation(s) and to verify debit / credit card data. We may use your mailing address to send you confirmation of your donation and / or sponsorship, confirmation of your Read for Good kit order, and to fulfil other, similar operational requirements.

If you provide us with your telephone number, it may be used to contact you if we need to verify order information or for other types of administration calls such as checking Gift Aid status for example. We will only use your telephone number to contact you with other information if you have given us permission to do so.

If you opt in to receive emails, then you are giving your consent to receive electronic communications from us (marketing or otherwise) and other updates. You can unsubscribe from marketing emails by clicking the unsubscribe link in the footer of our most recent email at any time. You will still receive service emails as part of the donations, sponsorship and kit order process as we deem these essential to our service offering.

If you wish to have all of your personal information removed from our master database and to be excluded from all future digital and print communications (operational, marketing or otherwise), under legislation you have the Right to Erasure (also known as the Right to be Forgotten). This includes and is limited to the removal of all personal information that is directly related to the individual requestor e.g. name, email address, etc. In the instance of schools, our standard practice is that the Right to Erasure will not be extended to information relating to the school of the requestor as the removal of this information from the Read for Good database will directly, adversely affect the core services we provide. Deleting information such as date of last order, order frequency, historical donation values, etc. associated with schools (not specific individuals) would impact the support and services other teachers, librarians etc. who join, or are already at the requesting school, may receive if they order a kit in the future.

In instances where all parties (requestor(s) and Read for Good) agree that a requestor who wants all historical information relating to them and their school be removed from the system, confirmation from the highest authority at that school (e.g. a Headteacher or Governing Body) may be required for our records. This will be discussed with the requestor at the earliest opportunity. If you would like to discuss (with a view to implement) your Right to Erasure then please email, post or call us. Please allow two full working days for an initial response to your request so that we can ensure that the process is effectively managed for all parties.

Please note, we do not knowingly collect any personal information from a child without the consent of the child's parent(s) or guardian(s). Children under the age of 16 should obtain parental consent before donating through our website. If a donor, email subscriber or sponsor is found to be lower

than the age of consent outlined in data legislation then that individual's records will be removed from our system.

### **Do we share your information?**

It is our policy not to sell, trade or rent your personal information to anyone.

We may share data with suppliers providing services to Read for Good in accordance with data processing agreements (as required by law); for example, for the purpose of distributing communications to you or for research and development. This could include keeping address records correct by screening against address changes, and it could include activities such as donation screening to ensure we are sending you the right information.

We use a third-party financial institution to process debit / credit card transactions. They receive the debit / credit card number and other personal information of our donors and sponsors only to verify credit card numbers and to process credit card transactions in a secure environment. These institutions are secure and data protection regulation compliant - as a result your personal information managed through these channels (if / when outside of the Read for Good website) is also subject to their individual privacy policies - more information is available on request.

<http://home.iatspayments.com/privacy-policy/>  
<https://trust.salesforce.com/en/compliance/>

Any personal information we do receive from this third party for the purposes of e.g. monitoring donation completions and values, is subject to the same security and privacy standards we set for data received directly through our website.

We do not disclose personal data other than to data processors carrying out work on our behalf under a Non-Disclosure Agreement. Any such companies are acting as approved data processors for Read for Good, and we ensure that any third parties we work with to assist with the delivery of our services are carefully selected based on their commitment to the same high standards for the protection of your personal data.

Examples of these data processors might be a mailing house for sending out our sponsored read kits, our email distribution services (currently Communigator and MailChimp), or data analysis agencies.

We may occasionally transfer your personal information overseas. For example, one of our bulk email distributors, MailChimp is based in the USA so we transfer email records to their system to prepare email broadcasts. Their systems are in compliance with UK Data Protection directives.

Read for Good uses strict procedures and security features to prevent unauthorised access to private data but in reality no data transmission across the Internet can be fully secure. Therefore, while we always attempt to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk.

We may disclose to third parties aggregate statistics regarding donations but these statistics do not include any personally identifying information. The information may include: total number of donors, total amount of donations for specific periods of time, and referring websites. Aggregate information of this kind is used for but is not limited to improving our sponsorship and donation processes.

Other third-party donation and sponsorship platforms such as Just Giving and Facebook's Create Fundraiser functionality can be used to process individuals and schools donations. In these instances your personal information will be subject to the terms of their individual privacy policies as we only receive the minimum viable amount of information required to process the operational functions associated with donations and sponsorship through these platforms. The information that we do receive will of course be subject to the same rigorous stewardship that we use for payments and donations taken directly through our website.

There are circumstances where the law allows Read for Good to disclose data (including sensitive data) without the data subject's consent, for example when required to do so for legal proceedings or when monitoring for equal opportunity purposes.

### **How long do we keep your information**

We will check your preferences with you periodically to ensure that you are still happy with the way that we contact you. You can make changes at any time by emailing us at [reading@readforgood.org](mailto:reading@readforgood.org) or by calling 01453 839005.

We will keep information such as your name and address details and donation history on our database for financial auditing purposes and to ensure that we don't mail you in the future if you have asked to be removed from our mailing lists. Historical order data stored at a school level will be kept on our system indefinitely to ensure we can maintain the operational service levels required by our supporters, sponsors and trustees - unless a valid reason has been agreed by all involved parties for the removal or deletion of such information.

### **How we use Cookies**

We use cookies (small pieces of data stored inside a website browser) across our website to improve its performance and to enhance your user experience. When you visit our website, cookies allow us to collect some non-identifying basic information. This includes the total number of visitors, the pages viewed, and other anonymous information. We use this information to make your experience on our website as smooth as possible and to allow us to make any necessary improvements.

#### **Necessary Cookies**

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies, services you have asked for and basic website functions cannot be provided.

#### **Performance Cookies**

These cookies allow us to analyse how visitors use our website and to monitor website and campaign performance so that we can provide a high quality experience and determine how effective our campaigns are. We may also use cookies at times to evaluate our ordering process and make it as customer friendly as possible.

#### **Functionality Cookies**

Our kit ordering system is set up to remember what you are ordering for only one visit. Although existing sponsored reads can be accessed online for the purposes of ordering more resources and making donations, any new kit orders will require you to re-enter your 'About me' and 'Order details' information for every order.

#### **Targeting cookies**

Read for Good rarely uses this type of cookie. These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website so you can be shown more relevant ads.

More detail on how businesses use cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org) Please note that cookies can be disabled on your device or browser but this may affect your experience.

## **Email marketing**

To enable us to determine which of our emails are more interesting to our users, Read for Good emails may contain a single tracking pixel. This pixel can allow us to see whether emails are opened and also which links people click the most. The pixel will be deleted when you delete the email.

If you do not wish the pixel to be downloaded to your device, please set your email client to receive plain text emails from us.

## **How do you contact us regarding your information?**

You can send anonymous donations simply by sending a money order to us at the address found at the bottom of this privacy statement. If you do not give your name and address we will be unable to send you a receipt.

If at any time you change your email or postal address, or if any of the other information we hold is inaccurate or out of date, please contact us.

You have the right to request access to all of the personal information that we hold about you on our system. This will be carried out without charge except in instances where the request is manifestly unfounded or excessive. On this premise there must be a valid reason for such requests, above and beyond i.e. personal interest. If your request is refused, we will inform you as to why in as much detail as possible, where applicable referencing relevant information from this privacy policy, with a view to reach a satisfactory resolution for all parties. All requests will be actioned without undue delay but please do allow at least 2 working days for an initial response from us. The entirety of the request process will take no longer than 30 days with the majority of requests concluded well in advance of this deadline.

If you would like to receive our email newsletter, please use the sign-up page on our website; or if you wish to unsubscribe from any of our mailings, you can unsubscribe from marketing emails by clicking the link in our most recent email at any time. Alternatively, please contact us with your request confirming your full name, address, and email address via post or by giving us a call and we will manually add you to our 'do not contact for marketing' list.

If you would like to discuss any of this policy in further detail, please do get in touch.

## **What happens in the event of a Data Breach**

Please see separate Data Breach Policy.

## **Read for Good Policies in Practice**

- This policy is reviewed on the date shown by the CEO and Operations Manager, with any changes approved by the Board of Trustees.
- Overall responsibility for this policy and its implementation lies with the Board of Trustees delegated to the CEO.
- This policy applies to all Read for Good personnel (including staff, trustees, and volunteers) because data is crucial to how we run our charity and all roles within the organisation have access to, and process this data. Trust in our data and privacy process is fundamental.
- This policy is shared with all relevant personnel via: induction, team meetings, board reports, website, shared drive.



- Read for Good ensures implementation and compliance of this policy by: making sure staff have appropriate input into the review process, discussion and training, leadership team modelling and reinforcing policy content into day to day work, by trustees showing focus and leadership over policy issues and a regular review process.
- Any service user who believes that this policy is not being followed should refer to Read for Good's Complaints policy. Internal complaints or concerns about adherence to the policy are handled with regular opportunities for all staff to speak in confidence to their manager, or the CEO or Trustee if the complaint or concern is about their line manager or CEO not adhering to a policy. Staff are encouraged to explain clearly what the lack of adherence relates to. The CEO and the person responsible for the policy have the opportunity to discuss the issue, and establish if it is a systems error, or an individual issue. For a systems error, systems will be improved and updated, and training for all staff will be undertaken. In a case of clear policy breach by an individual, the individual is given an opportunity to correct their error. If the adherence issue is persistent then training and monitoring will be offered and implemented, with reviews at appropriate points. Continued breaches may put the individual at risk of dismissal.