



Data Protection and Privacy Policy

Reviewed and adopted December 2020
and updated February 2023

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, Track My Read, information requests, surveys and meetings with our staff and as part of any other campaigns, programmes or projects we run.

We also collect and store your contact preferences, and will only send marketing communications where you have expressly permitted us to do so unless and until we are notified otherwise.

The detail of the information you provide us varies depending on your use of the Read for Good's services. Most commonly we require you to provide 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
- Essential school information (e.g. school address, number of pupils involved etc.)
- Donation and sponsorship details
- Direct Debit details (where applicable)
- Track My Read engagement
- Track My Read anonymised pupil reading data
- 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.

Why do we collect this information?

We collect personal information from you to enable us to process donations, enable programme delivery and to help us build a positive relationship by contacting you in a way that is personal and relevant to you.

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 some communications, which can take the form of letters, emails, or telephone calls, 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 and update emails, Direct Debit confirmations and advanced notices, thank you letters, bounced Track My Read email invitations, Gift Aid confirmation letters and emails querying returned mail, incomplete cheques or bounced Direct Debit payments with you. 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 postal address, your Gift Aid declaration 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.

Areas of Interest

We hold information about your particular areas of interest so, where permitted, we can send relevant information to you.

Address Information

We hold your address details for operational purposes (for example, when contact is required to process an order or donation but where no additional contact information was supplied) and, where permitted, for marketing purposes. We will also hold your address information on our database so that if you request that we 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?

Read for Good uses Salesforce, a major database provider, to manage and store most of its data. In addition, we receive donations (and other transactional data) through a variety of platforms such as (but not limited to) CAF and JustGiving, who also hold your data in accordance with their own policies. Read for Good's Salesforce instance is in their region code EU33, which currently stores data in Frankfurt and Paris. (This is subject to change, more information can be found [here](https://help.salesforce.com/s/articleView?id=000382217&type=1).
<https://help.salesforce.com/s/articleView?id=000382217&type=1>

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 related to our programme delivery.
- Fundraising appeals or to ask you to consider supporting us in other ways.
- 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 Governmental databases or specialist data suppliers.

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 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.

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 inform us of this. Please rest assured 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 web-based app that operates in accordance with this policy, with specific data-requirements:

- Admin Users are any users that create an account on Track My Read.
- Admin Users create a Track My Read account, and log in to Track My Read using Google authentication, meaning that no admin passwords are stored in Amazon Web Services.
- By creating a Track My Read account using Google authentication, you are agreeing to Google's Terms of Service.
- Track My Read uses the Amazon Web Services database in the Ireland region to store all of its data.
- Admin Users can configure their school (or 'organisation') with pupil (or 'participant') lists consisting of first name, last name, class and year group, plus a unique generated passcode.
- Admin Users can create Track My Reads and assign participants to them.
- Participants can log in with a combination of their organisation's unique log in URL, their username and a generated passcode.
- The only personal information that appears on a participant's dashboard is their first name along with aggregated summaries of their personal reading logs.
- Admin Users can choose to share a public dashboard for each Track My Read they set up. These public dashboards do not present any pupil identifiable information.
- Admin Users are only able to view participant information for participants at their own organisation. The participant information consists of first name, last name, class, year group and logged reading session data.
- Read for Good has no access to participant identifying information – Read for Good can see the participant's reading data, but there is no identifying information (names are converted into unique reference codes). Therefore no GDPR data processing agreements are required between the organisation (the school) and Read for Good, as stated in the ICO's Anonymisation of Data policy.
- The only identifying information Read for Good has access to is the Admin User's email address, name, organisation name and job title and these are stored within the Amazon Web Services database.
- By agreeing to these Terms and Conditions, the Admin User is agreeing to Amazon Web Services role as a Data Processor of the participants' first name, surname, class and year group, and their associated reading data. This is governed by AWS's GDPR compliance policy detailed in full here and summarised as:
 - *AWS as a data processor – When customers use AWS services to process personal data in the content they upload to the AWS services, AWS acts as a data processor. Customers can use the controls available in AWS services, including security configuration controls, for the handling of personal data. Under these circumstances, the customer may act as a data controller or data processor itself, and AWS acts as a data processor or sub-processor. AWS offers a GDPR-compliant AWS GDPR Data Processing Addendum (AWS GDPR DPA) that incorporates AWS's commitments as data processor. The AWS GDPR DPA, which includes Standard Contractual Clauses, is part of the AWS Service Terms and is automatically available for all customers who require this to comply with the GDPR.*
- Inviting participants to take part in Track My Read by email is optional. Participant email addresses entered as part of this process are not stored on Amazon Web Services and so do not fall within the remit of GDPR.
- Only selected developers who work under contract to Read for Good have access to the Amazon Web Services database server. Access is controlled via a maintained list of public keys.
- Upon request, Admin User accounts and all associated data can be deleted by Read for Good via our developers. Otherwise all Track My Read data is kept in perpetuity.
- In the event of a data breach, the developers will alert Read for Good as soon as possible, when our Data Breach Policy will be enacted.
- Currently, marketing preferences in relation to Track My Read are not recorded and, therefore, in accordance with GDPR principles, Admin email addresses will not be used for this purpose.

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 by post, email, or telephone. Irrespective of how we receive your personal information, it will be treated with utmost discretion and confidentiality.

More information about your data

Our website is a safe environment for anyone who visits. As such, donations made to us online are secure. Read for Good does not store any payment details (e.g. complete credit card numbers), instead we use third party platforms who specialise in managing financial transactions.

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, call, or send a letter to us. Please allow five 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 aim not to collect any personal information that has been provided by 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 younger than the age of 16, and is later found not to have their parent(s) or guardian(s) consent, 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 direct mail or for research.

We use third-party financial institutions to process payment transactions. They collect the debit / credit card number and other personal information to verify credit card numbers and to process transactions in a secure environment. By making a payment through these institutions, you are agreeing to their terms.

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 organisations or individuals 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 or data analysis agencies.

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. 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 JustGiving 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 their terms. The information that we do receive will of course be subject to the same rigorous stewardship detailed in this policy.

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 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 or by calling 01453 839005.

We will keep certain information indefinitely, unless instructed otherwise. Examples include your name and address details and donation history retained for financial auditing purposes; name and address details 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

These cookies remember your preferences and choices to improve your user experience and provide personalised features.

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 Please note that cookies can be disabled on your device or browser but this may affect your experience.

Digital marketing pixels

To enable us to determine which of our digital communications are more interesting to our users, Read for Good may use tracking pixels. These pixels can allow us to see whether emails are opened and also which links people click the most.

How do you contact us regarding your information?

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 by post, phone, or email.

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 5 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 discuss any of this policy in further detail, please do get in touch.

What happens in the event of a Data Breach

Please see our separate Data Breach Policy.

Read for Good Policies in Practice

- This policy is reviewed on the date shown by the CEO and COO, 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 Google 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.