

Chapter One UK – Website Privacy Policy

1. Our Privacy Policy

The privacy and security of your personal information is important to us at Chapter One and we are committed to ensuring that your privacy is protected. Any personal data collected by us will only be processed in accordance with this privacy policy.

2. Scope

This policy applies to all employees of Chapter One.

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A. About this Policy

Chapter One UK Ltd (“Chapter One”, “we”, “us” or “our”) is a charity registered in England and Wales with number 1179625 and its registered office at 4 Torriano Cottages, London, United Kingdom, NW5 2TA.

This privacy policy sets out how Chapter One processes personal data (that is, information by which an individual can be identified) collected by us in the course of our lawful activities, in accordance with the Data Protection Act 2018, the General Data Protection Regulation, the Privacy & Electronic Communications Regulations 2003 and any subsequent or related legislation in force from time to time (‘Data Protections laws’). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this. It is important that you read this privacy policy together with any other privacy policy or protocols we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. If you want to discuss any matter relating to how your data is used, please email us at hellouk@chapterone.org. We may be required in certain instances to ask that your request for information be submitted in writing.

References to the processing of information includes the collection, use, storage and protection of data. Chapter One is the ‘data controller’ for the purposes of this policy, except where otherwise stated, and the policy extends those working for and on behalf

of Chapter One and, to the extent set out below, anyone else processing data on our behalf from time to time.

Children of any age have the same rights over the data processed about them as adults, although their ability to understand and to exercise these rights may vary depending on their age and capacity. We therefore ask those legally responsible for any children with whom we engage to understand that our obligations are to each of those children separately as individual data subjects and to work with us accordingly. References in this policy to 'you' or 'your data' includes reference to children's data, as the context allows.

B. Why do we process your data?

Organisations are permitted to process data if they have a legal basis for doing so. Chapter One processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed; and/or
- Chapter One has a legitimate interest in processing the data; and/or
- It is necessary in relation to or in anticipation of a contract, agreement or ongoing arrangement for the provision of services which someone has entered into with Chapter One or because someone has asked for something to be done so they can enter into a contract, agreement or arrangement with us; and/or
- There is a legal obligation on Chapter One to process data.

If and to the extent that Chapter One is relying on solely consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which Chapter One is able to provide services to or interact with you in future.

Where consent is sought in relation to a child under the age of 16 years of age, we will ask that someone legally responsible for them provides such consent. Where we (in the capacity of a data processor) receive such data from another data controller, such as a school, we do so in reliance on the express or implied assurance that it is being shared with us lawfully and with all due authority.

We may change this policy from time to time and any such changes will be published on our website. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

This policy was most recently reviewed in February 2024.

C. What personal data do we collect and process?

We process the data necessary for Chapter One to fulfil its charitable objects to advance education for the benefit of the public and in particular improve the literacy skills of young children from disadvantaged backgrounds through our online reading volunteer programme. We also process data to enable the effective running of Chapter One as charity delivering services to beneficiaries and raising funds for and awareness of our work through fundraising and promotional activities. Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses of staff, volunteers, parents, supporters, or others with whom we have contact.
- Information necessary for the employment of staff or the engagement of volunteers, including that necessary to pay salaries or fees and also all necessary information relating to our obligations for the safeguarding, welfare and protection of children, such as references and Disclosure and Barring Service checks. We may also collect, store and use more sensitive types of personal data, including ethnicity data and information about your health, such as any medical condition and sickness records.
- Such information relating to children participating in and benefitting from our activities as are necessary to provide services to them, such information being provided to Chapter One as a data processor by schools as data controllers in respect of the information provided to us.
- Donor records and preferences, including, where necessary, bank or payment details and details of tax status in order to process payments and claim Gift Aid
- Such other information that is relevant and necessary for Chapter One to carry out its activities, charitable purposes and legal obligations.

Such data may be collected, for example, when you provide it through our website or by some other means, when shared with us by a school participating in our programmes, submitting an enquiry, when making a donation, subscribing for a service, when you request assistance, when you fill in your details on a pledge card or Gift Aid form, when you tell us about yourself if you apply to work for Chapter One as a volunteer or employee or when you otherwise provide us with personal data in some other way.

D. How do we use your data?

We process your personal data to operate Chapter One as stated above, and in particular for the following purposes:

- For internal record keeping, invoicing, communication and administration
- To provide services to beneficiaries whilst ensuring the safeguarding, welfare and protection of those to whom we owe a duty of care
- To let you know about Chapter One's activities, events and campaigns or related matters which we think may be of interest to you
- To comply with any legal obligations and to protect parties' interests in cases of dispute

Data processed will be retained only for as long as the purpose for which it was collected continues and for as long as is reasonable and permissible in law. Accordingly, the periods for which we retain data will vary depending on the purposes for which it was collected and relevant statutory or other requirements.

In addition to those circumstances mentioned above, we will only share data with trusted third parties (including those outside the United Kingdom or European Economic Area such as Chapter One NFP, our US based partner organisation) to the extent and where necessary for us to support Chapter One's activities and to promote our work (such as online platforms or for secure data storage or for email communications), to process payments (including through online payments platforms or providers including JustGiving) and only once we are satisfied that any such use of data will accord with our privacy policy. This includes having in place appropriate organisational and technical measures to protect the privacy and security of data from accidental or unlawful loss,

disclosure, destruction, access, or alteration, bearing in mind the risks of processing and the nature and sensitivity of the data. We will also ensure that we use specific contracts approved for use in the UK/EU which give your personal data the same level of protection. We will never sell your personal information and will not share it without your explicit consent, except as stated above. Please contact us if you want further information on the specific mechanisms used by us when transferring your personal data out of the UK/EU.

E. Your rights in relation to your personal data

You, as the data subject, may request deletion of your data at any time in writing, subject to any overriding legal requirement for its retention, such as the need, where appropriate, to comply with legal or safeguarding obligations or the requirements of regulatory authorities such as His Majesty's Revenue and Customs, or to prevent the commission of or to assist in the investigation of an actual or suspected criminal offence. We may keep certain data on a 'suppression list' so we know, if requested, not to contact you or process your data in future until further notice.

You may request details of personal information which we hold about you. Those legally responsible for a child may request such details about the child and we reserve the right to seek verification of the identity of persons making such requests before we respond. You will not usually have to pay any fee to exercise any of your rights, but a small fee may be payable if an information request is particularly onerous, unfounded, or repetitive. Alternatively, we may refuse to comply with the request in these circumstances. We'll try to respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will come back to you and let you know.

You may choose to object to or restrict the collection or use of your personal information, but this may impact or limit the way in which we are able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation on us to retain data, and as stated above.

You may also have the right to (a) receive the personal data you have provided to us, in a structured, commonly used, and machine-readable format and (b) transmit it to another data controller. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Where Chapter One is carrying out the processing on the basis of your consent, you can modify or withdraw this consent at any time by notifying us in writing. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

You are responsible for the accuracy of data you have provided to Chapter One. If you believe that any information we are holding about you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

Where your data has been supplied to us by another party, such as a school or other institution, meaning that Chapter One is processing it on behalf of that other party and is acting as a data processor, please note that in order to exercise your rights over your data you should submit any request relating to it to the party that supplied the data to us.

In the unlikely event that there is any kind of a breach of our duties and obligations under this policy or the Data Protections laws, we will take immediate steps to isolate and rectify the problem. Should the breach be serious one (where there is a risk of, for example, discrimination, damage to reputation, financial loss or loss of confidential information) we have a duty to report that matter to the individuals affected and to the Office of the Information Commissioner.

You can obtain further information about Data Protection and privacy laws, your rights and raise any complaints or concerns about our processing of your personal data by visiting the Information Commissioner's website at: <https://ico.org.uk/your-data-m...>;

F. Security

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data on behalf of Chapter One do so in accordance with this policy and on the basis that Chapter One is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. Please note that, unless encrypted, email messages sent via the internet may not be secure and could be intercepted and read by someone else. Please bear this in mind when deciding whether to include personal or sensitive information in any email messages you send to us.

G. Web browsing and Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to user's needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type, together with certain anonymous statistical data about your browsing activities and patterns which does not contain any personal data.

Advertising Cookies

We may from time to time use pixels from providers like Facebook, Twitter, LinkedIn and Google Adwords in order to allow them to deliver that are relevant to you and your interests on their platforms. These cookies can track your browsing history across our websites. If you wish to prevent these cookies you can opt out of these cookies through your device's browser security settings or via any account you have with the advertising providers.

We use the Facebook Pixel, which (if you are a Facebook user) enables them to deliver adverts that are relevant to you via Facebook. The Facebook Pixel is a cookie that collects information about your visit to our site (such as your IP address). That information is relayed to Facebook by the Facebook Pixel. If you do not have a Facebook account the data is not used and is deleted. If you have a Facebook account, Facebook can then recognise you from your IP address the next time you log in to Facebook and deliver advertising to you based on the information it collected from your visit to our site. If you wish to stop the Facebook Pixel from collecting information, you can do so by changing your settings in your account.

Passwords

Where we have given you or you have chosen a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.

H. Links to other websites

Our website may contain links to other websites of interest. However, 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.

Contact us