
PRIVACY POLICY

★ About us

STAR – Steps to Active Recovery (STAR) is a national Christian Charity and is the data controller. This means it decides how your personal data is processed and for what purposes.

We are committed to protecting and respecting your privacy when you use our services, if you work for us, provide services to us or volunteer for us. Your privacy is really important to us and we understand how important it is to you. Our aim is to be as clear and open as possible about what we do with your personal information and why we do it. The Charity is committed to the privacy of all its members, clients and those who have regular contact with us in connection with those purposes, including those who attend our courses, events and use our services.

★ How do we process your personal information?

The Charity complies with its obligations under the General Data Protection Regulation “GDPR” by keeping personal information up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of information; by protecting personal information from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal information.

In the interests of transparency and to be as clear as possible, you can read about the specific information we collect about you, how we keep your information confidential and secure, and how you can access your information.

This policy explains what we may need to use information about you for...

- Deliver services and support to you
- To be able to offer our clients the best advice based on their circumstances
- Manage those services we provide to you
- To inform you of news, courses, events, activities and services run by STAR
- Train and manage the staff and volunteers who deliver those services
- Help investigate any worries or complaints you have about your services
- Check the quality of services
- Help with research and planning of new services
- Maintain our own accounts and records (including the processing of gift aid claims)
- Keep people informed of news, events, courses, activities and services run by STAR and its partners
- To fundraise and promote the interests of the Charity

What is the legal basis for processing your data?

We have various scenarios under which we may use your information, and for each have identified a lawful basis, as described here:

★ Legitimate interest applies:

- Where we maintain and process information about our members, guests, volunteers, former members and those who are in regular contact with us.
- Where you sign up for an event, course or group run by the charity and we communicate with you about that event or group.
- Where you have contacted us independently for information about the charity. In this context we will only use your contact details to respond to your enquiry unless you explicitly consent for us to use your information of another purpose.
- Where we need to communicate with you about:
 - ✓ Charity news, events, courses, services
 - ✓ A public-interest matter, for example to let you know if an event is cancelled due to bad weather or any other reason
 - ✓ A course, event, group that you are involved in as part of a serving team
- For good governance and accounting, for planning, analysis and developing new services, courses, groups, etc.

★ Legal obligation applies:

- When you exercise your rights under data protection law and related disclosures
- Where we are required to maintain and report financial/accounting information for up to six years from the end of the tax year in which a financial transaction was processed. This would typically be in respect of donations you may make to the charity, or ticket payments for certain events or courses run by the charity.
- Where we are required to maintain attendance records at groups, courses or events for safeguarding purposes.

★ Consent applies:

- Where you have voluntarily subscribed to the charity's subscriber mailing list. You can unsubscribe from this list at any time using the unsubscribe link in the footer of those periodic emails.

★ Sharing your personal information?

The information we hold about you will be treated as strictly confidential and we will only share your data with third parties with your prior consent, or unless required to do so by law.

★ How secure is your information?

The charity uses a secure Charity Management System that is only accessible by authorised charity leaders, staff and group leaders. We have taken all practical and reasonable technical measures to ensure our administrative and processing activities are secure.

★ How long do we keep your personal information?

We keep data in accordance with the guidance set out by the GDPR. We endeavour to maintain only data that is relevant, accurate and up to date. We have internal processes to periodically review the data we hold and delete data that is no longer relevant to our purpose for processing. Specifically, we retain client and former client information while it is still current; Gift Aid declarations and financial data for up to 6 years after the calendar year to which they relate; and safeguarding records permanently.

★ Your rights and your personal information:

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal information:

- **Access to your information:** You have the rights to request a copy of the personal information about you that we hold.
- **Correcting your information:** We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information:** You have the right to ask us to delete personal information about you where:
 - ✓ You consider that we no longer require the information for the purposes for which it was obtained or that we no longer need to retain it in accordance with our statutory obligations;
 - ✓ You have validly objected to our use of your personal information – see objecting to how we may use your information below;
 - ✓ Our use of your personal information is contrary to law or our other legal obligations.
- **Objecting to how we may use your information:** Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.
- **Restricting how we use your information:** In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.
- **Withdrawing your consent using your information:** Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given. Please contact us in any of the ways set out in the 'Contact information and further advice' section if you wish to exercise any of these rights.
- **Lodging a complaint:** If you feel we have used your information incorrectly or without lawful basis, or you dispute our lawful basis, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

★ Further Processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

★ Our Contact Details

We can provide you with access to your personal data at any time. We ask that requests are made in writing to the Director, who is responsible for Data Control, at STAR Steps to Active Recovery, c/o Faithworks, Heron Court Road, Bournemouth, BH9 1DE or contact 07434593835 (STAR Central Mobile).