

GDPR

We are committed to protecting your personal information and being transparent about what we do with it, no matter how you interact with us. That's whether you want to work, volunteer or advocate for us, donate, buy goods or use our services, want information, training or want to learn more about what we do.

We are committed to using your personal information in accordance with our responsibilities. We are required to provide you with the information in this Privacy Notice under applicable law which includes:

- the European Union General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR') and the Data Protection Act 2018 ('DPA') referred to as the 'data protection legislation'
- the Privacy and Electronic Communications Regulation (2003)

We won't do anything with your information you wouldn't reasonably expect.

Processing of your personal information is carried out by or on behalf of AAS Investments and Consultancy Ltd

If you have any queries about our Privacy Notice, please feel free to get in touch

Email office@aasgroup.org

Phone 01172309023

Post AAS Investments and Consultancy Ltd
609 Fishponds Road
Fishponds
Bristol
BS16 3AA

How and when we collect information about you

- **When you directly give us information**

We may collect and store information about you when you interact with us. For example, this could be when you:

- support our work through a donation
- fundraise on our behalf
- register for an event
- tell us your story
- submit an enquiry
- register for or use our services
- participate in our training
- give us feedback
- make a complaint
- apply for a job
- register as a volunteer
- enter into a contract with us
- are captured by CCTV recording.
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- **When you indirectly give us information**

When you interact with us on social media platforms such as Facebook, WhatsApp, Twitter or LinkedIn we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices.

We may obtain information about your visit to our site, for example the pages you visit and how you navigate the site, by using cookies. Please refer to our cookies policy for information on this.

- **What information we might collect**

When you engage with us by phone, mail, in person or online, we may collect information about you (referred to in this Privacy Notice as 'personal information'). This may include your name, address, email address, telephone number, date of birth, job title and details of your education and career, why you are interested in AAS Investments and Consultancy Ltd, and other information relating to you personally which you may choose to provide to us.

Data protection law recognises that certain types of personal information are more sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

Sensitive information will only be collected where necessary, for example, we may need to collect health information from you when you register for a challenge event or to deliver a community service as a volunteer or member of staff. Clear notices will be provided at the time we collect this information, stating what information is needed, and why.

With your explicit consent, we may also collect sensitive personal information if you choose to tell us about your experiences relating to our services for use in a case study.

- **If you're under 16**

If you're aged under 16, you must get your parent/guardian's permission before you provide any personal information to us.

- **How and why we use your information**

We will use your personal information for the following purposes:

- **Donation processing:** We will process personal information you provide in order to administer any one-off or on-going donations you make and claim Gift Aid.
- **Responding to a request:** If you contact us with a query, we may use your personal information to provide you with a response.
- **Fundraising or direct marketing:** We will only send you marketing information by email, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in to receive marketing information again, then your most recent preference may supersede. If you respond to a fundraising appeal by post, you may also receive fundraising mail, which you can opt out of at any time.
- **Monitoring and Evaluating:** We may use your information in order to improve current and future delivery of our services.
- **Processing an application to work with us:** We may process your information if you send or fill in an application form or send us your CV or details in respect of an opportunity to work with us in order to evaluate your suitability and respond to you.
- **Transactional purposes:** We will need to use your personal information in order to carry out our obligations arising from any contracts entered into between you and us for goods or services, for example, processing your order and payment for a product from our online shop.
- **Providing and developing our website:** We may use your personal information to help provide you with access to our website, personalise your experience, and improve and develop it further.
- **Administration:** We may use your personal information to record and deal with a complaint, record a request not to receive further marketing information, record what our volunteers have done for us, and for other essential internal record keeping purposes.
- **Prevention of crime:** We may record your image on CCTV which we use to prevent crime and keep our people and the public safe.
- **Protecting your vital interests:** We may process your personal information where we reasonably think that there is a risk of serious harm or abuse to you or someone else.
- **Market research and surveys:** We may invite you to participate in surveys or market research to help us improve our website, fundraising, services and strategic development. Participation is always voluntary and no individuals will be identified as a result of this research, unless you consent to us publishing your feedback.
- **Legal, regulatory and tax compliance:** Where required we are subject to a legal obligation, we may process your personal information to fulfil that obligation.

- **Who do we share your information with?**

We will only use your information for the purposes for which it was obtained. We will not, under any circumstances, sell or share your personal information with any third party for their own purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

We will only share your data for the following purposes:

1. Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, projects, or fundraising activities and appeals. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses.
2. Where legally required: We will comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

We always aim to ensure that personal information is only used by those third parties for lawful purposes in accordance with this Privacy Notice.

- **How we protect your information**

We use technical and corporate organisational safeguards to ensure that your personal information is secure. We limit access to information on a need-to-know basis and take appropriate measures to ensure that our people are aware that such information is only used in accordance with this Privacy Notice.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Our online forms are always encrypted, and our network is protected and routinely monitored.

If you use your credit or debit card to donate to us, buy something or make a booking online, we pass your card details securely to our payment processing partners. We do this in accordance with industry standards and do not store the details on our website.

However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including personal information) disclosed or transmitted over public networks.

- **Vulnerable circumstances**

We understand that additional care may be needed when we collect and process the personal information of vulnerable supporters and volunteers. In recognition of this, we observe good practice guideline in our interactions with vulnerable people.

- **How long will we keep your information?**

We will keep your personal information in respect of financial transactions for as long as the law requires us to for tax or accounting purposes (which may be up to six years after a particular transaction).

If you request that we stop processing your personal information for the purpose of marketing we may in some instances need to add your details to a suppression file to enable us to comply with your request not to be contacted.

In respect of other personal information, we will retain it for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the Information Commissioner's Office.

- **International transfers of information**

We may, on occasion decide to use the services of a supplier outside the European Economic Area (EEA), which means that your personal information is transferred, processed and stored outside the EEA. You should be aware that, in general, legal protection for personal information in countries outside the EEA may not be equivalent to the level of protection provided in the EEA.

However, we take steps to put in place suitable safeguards to protect your personal information when processed by the supplier such as entering into the European Commission approved standard contractual clauses. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

- **Your rights to your personal information**

Data protection legislation gives you the right to request access to personal information about you which is processed by the AAS Investments and Consultancy Ltd and to have any inaccuracies corrected.

You also have the right to ask us to erase your personal information, ask us to restrict our processing of your personal information or to object to our processing of your personal information.

If you wish to exercise these rights, please contact us at the address below send it along with copies of two separate identification documents which provide photo identification and confirm your address, such as a passport, driving licence, or utility bill.

Please also provide any additional information that is relevant to the nature of your contact with us, as this will help us to locate your records.

You can send us the documents via post to:

AAS Investments and Consultancy Ltd
609 Fishponds Road
Fishponds
Bristol
BS16 3AA

Alternatively email a copy of the form along with scans or photos of your two forms of identification to: office@aasgroup.org

We will respond within 30 days, on receipt of your written request and copies of your identification documents.

- **How to make a complaint or raise a concern**

If you would like more information, or have any questions about this policy, to make a formal complaint about our approach to data protection or raise privacy concerns please contact us either by phone, email or in writing

If you would like to make a complaint in relation to how we have handled your personal information, then you can raise your concern with the relevant statutory body:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

- **Changes to our Privacy Notice**

Our Privacy Notice may change from time to time, so please check this page occasionally to see if we have included any updates or changes, and that you are happy with them.

(Last updated: 23 May 2018)