

## Privacy Notice

The Waterfall aim to be clear about how we obtain your details and only process them in ways we believe you would reasonably expect. This privacy notice explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information. This notice tells you what information we collect, steps we take to protect and secure it, how we use and share the information, and finally, how you can contact us with questions or concerns.

We'll keep this notice updated to show you all the things we do with your personal data.

### Who we are

The Waterfall is a non-profit charity, providing a structured recovery programme and support to women with addictions.

The Waterfall is the data controller, and this means we decide how your personal data is processed and for what purposes. The information you share with us can be used for The Waterfall operational purposes. The Waterfall is not in the business of selling information about you.

### Your personal data – what it is

Personal data is any information that relates to a living individual who can be identified from that data, for example your name, address, date of birth, gender, email address, telephone numbers, photographs, CCTV images or financial information. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

GDPR provides the following rights for individuals:

1. **The right to be informed:** We are informing you about your personal data rights through this privacy notice.
2. **The right of access:** You have a right to ask for a copy of the personal data we hold about you. Please make a subject access request to [admin@thewaterfall.org.uk](mailto:admin@thewaterfall.org.uk)
3. **The right to rectification:** If there are any discrepancies in the details we provide, please let us know so that we can ensure our records are accurate and up to date.
4. **The right to erasure:** You have the right to request that your personal data is erased from our files and database, unless there is a legal reason we have to keep it.
5. **The right to restrict processing:** In certain circumstances you have a right to require us to stop processing your personal data in a particular way.
6. **The right to data portability:** We do not hold information in this way, however, do please check with us if you believe we can be of help.
7. **The right to object:** You may ask us to stop processing any personal data about you for by contacting us using the details below.
8. **Rights in relation to automated decision making and profiling:** The Waterfall do not carry out automated decision making or profiling.

## Information we gather

The Waterfall Trust:

- Collects personal information when you get in contact with us and when you post content on the media platforms.
- May combine information about you that we have with information we obtain from others.
- May also collect information about your transactions with us. This information might include information necessary to process payments due to us from you such as your credit card number, or gift aid declarations.
- Uses Google Analytics to analyse how visitors to our website use it and so that we can make it useful and relevant. You can read a separate privacy policy for Google Analytics [on their website »](#)
- Uses information for the following general purposes: products and services provision, billing, identification and authentication, services improvement, contact and research.
- May gather information that you tell us about yourself for our operational records or as a Waterfall Trust member. We will do this in line with our Data Protection Policy.
- Will process personal data relating to those who work or volunteer within The Waterfall Trust as appropriate in line with Data Protection legislation. This is for safer recruitment purposes and to assist in the running of the charity and/or to enable individuals to be paid. This personal data includes identifiers such as names and National Insurance numbers and sensitive personal data such as criminal records, employment contracts and remuneration details, qualifications and absence information. For roles where it is appropriate, we will require individuals to apply for a DBS disclosure. Once complete we will store the details in line with the Waterfall Trust Data Protection policy.

## Information use, sharing and disclosure

The Waterfall Trust does not share personal information we learn about you from your use of the Service or our website except as described in this policy. We do not share your information with unrelated third parties for their direct marketing purposes.

The Waterfall Trust may use or share your personal information where it is necessary for us to complete a transaction, to operate or improve The Waterfall Trust and related products and services, to do something that you have asked us to do, or tell you of products and services that we think may be of interest.

Where you are contacted with information, an offer or service based on information you have shared with us, we will do our best to provide you with an opportunity to opt-out of receiving such further communications at the time you are contacted.

When you post a message, the identity that you are posting under may be visible to other users. When you post a message on the website, you have the ability to post a message which may include personally identifiable information about you.

If you post personal information online that is accessible to the public, through our website or social media, you may receive unsolicited messages from other parties in return.

The Waterfall process your information on the following lawful basis:

### **Consent**

You may have provided your consent to us using your personal data for a specific purpose.

Whenever you provide us with your personal data you will be able to choose the purposes for which you are giving your personal data and the way in which you would prefer to be contacted.

We will ask for your consent to use your personal data to send you post or electronic communications, such as newsletters and emails. You always have the right to withdraw your consent at any time.

### **Legitimate interest**

Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (as long as the processing is fair, balanced and does not unduly impact individuals' rights).

We will rely on this basis to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights.

When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

### **Legal**

It is necessary for compliance with a legal obligation to which we are subject:

We may share your personal information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of The Waterfall policies, or as otherwise required by law. This would include where we must retain certain records, or where we are required to disclose personal data to any regulators or law enforcement agencies.

When we process information to obtain a Disclosure & Barring Service (DBS) Certificate, we are processing your information to fulfil our legal obligation to ensure those working with children or adults have DBS checks carried out, as required by law.

Where we do collect such sensitive data from you, we will ensure that we obtain your prior explicit consent. You always have the right to withdraw your consent.

If there is ever a change to how The Waterfall uses or intends to use personal information, we will post that change to this notice.

### **Links to other websites**

Our website contains links to other websites, because we think you'll find them interesting. However, once you have used these links to leave our site, you should remember 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 while visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

### **Photography**

The Waterfall Trust collects, stores and uses official photographs across its communications platforms. A photo consent form will be required before we use any photo or video. Forms are available on request from [office@thewaterfall.org.uk](mailto:office@thewaterfall.org.uk)

We take no responsibility for photographs taken by other individuals whilst at, or involved with, The Waterfall Trust.

### **Confidentiality and security**

No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we make efforts to ensure security on our systems.

We use physical, electronic, and procedural safeguards to protect personal information about you. In certain areas, The Waterfall may use SSL encryption to protect data transmissions. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software.

If The Waterfall learns of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By providing personal information to us via the website, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the site. The Waterfall may post a notice on our website if a security breach occurs. If this happens, you will need a web browser enabling you to view the [www.thewaterfall.org.uk](http://www.thewaterfall.org.uk) website. The Waterfall may also send an email to you at the email address you have provided to us in these circumstances.

### **More information and contacting The Waterfall**

If you have a privacy concern regarding The Waterfall, or this notice, you should contact the office by sending an email to [office@thewaterfall.org.uk](mailto:office@thewaterfall.org.uk)

In the event that we are unable to resolve your concerns, The Waterfall is committed to cooperating to achieve a proper resolution of your privacy concerns. If you would like to make a complaint, please contact our CEO by sending an email to: [donna.cullimore@thewaterfall.org.uk](mailto:donna.cullimore@thewaterfall.org.uk)

Should you wish to see the full Data Protection Policy, please contact the office: [office@thewaterfall.org.uk](mailto:office@thewaterfall.org.uk) – and we will review your request.

If you object to any sharing of your personal information that may be permitted under this notice, you may do so by writing us at the address at the foot of this page. We will take reasonable steps to accommodate your requests as they relate to our communication practices. In some instances, honouring your requests may interfere with or impede your ability to benefit from the charity or may require us to terminate our relationship with you.

You can also contact the Information Commissioner's Office at:

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Tel: 0303 123 1113

Email: <https://ico.org.uk/global/contact-us/email/>