

# Hope into Action UK

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## PRIVACY NOTICE FOR FRANCHISEES

### Personal data

Your privacy is very important to us. This privacy notice is provided by Hope into Action UK (HIA) whose registered office at 26 North Street Peterborough, PE1 2RA (referred to in this Privacy Notice as HIA, or 'we', 'our' and 'us').

This Privacy Notice sets out how we collect and process your personal data (which is information which identifies you). It also provides certain information that is legally required and lists your rights in relation to your personal data.

Please read this Privacy Notice to understand how we may use your personal data.

This Privacy Notice may vary from time to time so please check it regularly. This version of our Privacy Notice was last modified on 9<sup>th</sup> January 2019.

### Data controller and how to contact us

For the purposes of relevant data protection legislation, we are a controller of your personal data and as a controller we use the personal data we hold about you in accordance with this Privacy Notice. We as a controller, determine why and how we collect and use your data.

Please contact us using the details provided in paragraph "**Contact us**" below, if you wish to;

- correct your personal data held by us;
- opt out at any time from receiving marketing correspondence from us or to alter your marketing preferences;
- speak to us in connection with our processing or use of your personal data; or
- gain access to your personal data.

### What personal data do we hold about you?

The categories of personal data about you that we may collect, use, store, share and transfer are:

- Contact data: this includes details of you, your Chief Executive and Trustee Board containing each name, address and email address.
- Financial data: this includes personal data which relates to your finances, such as your bank account and payment card details and information which we collect from you for the purposes of the prevention of fraud
- Relevant data relating to the management of the franchise relationship between you and us.

### How is your personal data kept safe?

At all times we shall use all reasonable endeavours to keep your data accurate and updated but we do not undertake to check or verify the accuracy of personal data provided by you. So that we can keep the data accurate, please let us know if any of your information changes by contacting us on the

details provided below in the paragraph “**Contact us**” below. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

We keep personal information secure with appropriate measures in place to protect against the loss, misuse and alteration of personal information, however, the transmission of data across the internet is not completely secure. We cannot guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

We ensure that access to personal data is restricted only to those members of staff or volunteers whose job roles require such access and that suitable training is provided.

A login account with password is required to access data held on our computer system. Any hard copies will be kept in a secure, locked room with the key only available to authorised members of staff.

### **What is your data used for?**

We use personal information to:

- To assist us in identifying the regional scope of the HIA franchise network
- To comply with any legal obligation
- For administrative purposes
- For performing and monitoring compliance with the Franchise Agreement and HIA values and mission and providing ongoing support
- For marketing purposes
- In order to protect the reputation of HIA and the HIA model

### **Does HIA have a right to your data?**

Under Data Protection legislation, we need to have a “lawful basis” for “processing” your personal information (this is the legal terminology for us keeping and using your personal data). The particular justification depends on the proposed use of your personal information. Where we state below that we are relying on our legitimate interests to use your personal information then we will only do so in a way which does not overly prejudice your privacy rights. We have set out the general legal bases together with any additional special condition we are relying on below for each anticipated use of your personal data.

- To process your application to become one of our franchisees. The processing is necessary to perform a contract with you and for our legitimate interests in managing our business;
- To communicate with you about the operation of your franchise. The processing is necessary to perform a contract with you;
- For administration purposes. The processing is necessary to perform a contract with you and for our legitimate interests in managing your contract and administering our business.
- For the operation of our business including protecting it from fraud. The processing is necessary for our legitimate interests in administering our business and to provide the services to you in the performance of our contract with you. Additionally, the processing is may be necessary for us to establish, exercise or defend any legal claims;
- For audit purposes. The processing is necessary for our legitimate interests to monitor and improve the way we offer our services and the public interest in statistical research;

- To comply with our own legal and regulatory obligations and defend or exercise our legal rights. The processing is necessary for us to comply with a legal obligation to which we are subject and for our legitimate interest to protect our business and reputation.

### **Sharing your data**

We may share some of your personal data with:

- our external professional advisers such as accountants, bankers, insurers, auditors and lawyers; law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights; and
- third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation);

We would also share data with relevant authorities and appropriate persons where it is necessary to establish or verify any relevant evidence for the purposes outlined in this Privacy Notice.

Where we retain the services of a third party provider, data may also be shared in compliance with our own security standards, policies and procedures.

We will not share your data with any other third party without your consent, unless there is a legal requirement for us to do so.

### **How long will your personal data be kept?**

Our relationship with our franchisees is generally long term so taking into account any legal, accounting, reporting or regulatory obligations, we will keep the data whilst it is necessary to maintain that relationship and beyond that, to safeguard our legal interests.

### **International Transfer of data**

We do not currently transfer, store and/or process any personal data outside the European Economic Area, However if we do decide to do so in the future then we will only do so if In connection with such transfers: the relevant safeguard is in place such as standard model clauses or on the basis of an adequacy decision such as where the European Commission has decided that the relevant non-EU country ensures an adequate level of protection.

### **What rights do you have?**

You have a number of rights under Data Protection legislation, including:

- the right to request access to your personal data that we process or control;
- the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- the right to request, on legitimate grounds as specified in law:
  - (a) erasure of your personal data that we process or control; or
  - (b) restriction of processing of your personal data that we process or control;
- the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and

- the right to lodge complaints regarding the processing of your personal data with the Information Commissioner's Office or other relevant supervisory body. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out below in paragraph "**Contact us**" below.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

### **Contact us**

To make enquiries in relation to this privacy notice, exercise any of the above rights, or to make a complaint about our use of your personal information, please contact our Data Protection Officer by email at [dpo@hopeintoaction.org.uk](mailto:dpo@hopeintoaction.org.uk) or by telephone on 01733 558301 or by writing to us at 26 North Street Peterborough PE1 2RA.

If you are not satisfied with the way we deal with your complaint, you have the right to refer it to the Information Commissioner's Office without first referring it to us.

### **Changes to this privacy statement**

We keep our privacy notice under regular review and we reserve the right to change this statement from time to time. If changed we will post a new notice on this page. This notice was last updated on 9<sup>th</sup> January 2019.