

At Brighter Futures, we are committed to protecting and respecting your privacy. This policy applies to all personal data collected by Brighter Futures under the Data Protection (Jersey) Law 2018. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), contact us or access our services.

When contacting and engaging with Brighter Futures you will be provided with a copy of this privacy policy and we will ask you to confirm you are in agreement before we will be able to process your requests further. It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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. This privacy notice supplements the other notices and is not intended to override them.

## Contact Details

Any questions regarding this policy and our privacy practices should be sent by email to [info@brighterfutures.org.je](mailto:info@brighterfutures.org.je) or by writing to Brighter Futures, The Bridge, Le Geyt, St Saviour, JE2 7NT. Alternatively, you can telephone 01534 449152.

You have the right to make a complaint at any time to the Office of the Information Commissioner ("OIC") **Telephone:** +44 (0)1534 716530, **Email:** [enquiries@dataci.org](mailto:enquiries@dataci.org)

### Address:

Office of the Information Commissioner  
Brunel House  
Old Street  
St Helier  
Jersey  
JE2 3RG

the Jersey supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the OIC so please contact us in the first instance.

## Who are we?

Brighter Futures is a fidéicomis, constituted under Loi (1862) sur les teneures en fidéicomis et l'incorporation d'associations, charity based in Jersey, Channel Islands, which supports parents, carers, children and young people. We are registered with the Association of Jersey Charities (registration number AJC 320). We provide a number of free programmes and services to help support the parents and carers we meet. Parents and carers come to us for a variety of reasons and from across the social system.

Brighter Futures is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

## Our commitment to data security

To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the personal information we collect.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the Internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to or by us.

Any personal information you give to us will only be used by Brighter Futures and by its controllers or processors and service providers. We do not sell or share personal information with third parties unrelated to it. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

We have contracts in place with our data controllers and processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

## How do we collect information from you?

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services by email, post or telephone;
- subscribe to our service or publications;
- request marketing to be sent to you;
- make a donation to us;
- enter a competition, promotion or survey; or
- give us some feedback.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based inside or outside the EU; and
- (b) search information providers based inside or outside the EU.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.
- Other service providers and our associated agencies and referrers based in Jersey.

## What type of information is collected from you?

If you are accessing services we require information from you that includes your personal contact details, the nature of your query and information that you choose to disclose which is relevant to us providing you with access to our services and the fulfilment of our duties to you. If you are a client, this may include special categories of personal data (as detailed below).

As a donor, volunteer or if you sign up to our newsletter, the personal information we collect will include your name, address, email address, telephone number, your link to the charity (for example, donor/friend/event attendee) as well as information regarding your donation.

**Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

**Contact Data** includes billing address, delivery address, email address and telephone numbers.

**Financial Data** includes bank account and payment card details. We do not take donations directly online; these are handled through a secure third party site such as [www.justgiving.com](http://www.justgiving.com) who manages their own information storage. Please refer to their privacy policy for more information.

**Transaction Data** includes details about payments to and from you and other details of products and services you donated to.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Special categories of personal data** this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## Retention of personal information

We will retain your personal information only for as long as it is required for the purposes for which it was collected or as required to do so by law. Our retention period will be 2 years. All data kept after this time will be stored by encrypted backup.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## How is your information used?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation;
- process a donation that you have made;
- process information requests that you have submitted;
- assess an application made to Brighter Futures;
- carry out our obligations arising from you accessing our services and programmes;
- deal with entries into a competition or event invitations;
- seek your views or comments on the services we provide;
- administrate our services ;
- enhancing the value of support;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities, promotions of our associated companies goods and services; process a grant or job application;
- inform you of educational and related purposes consequential to Brighter Futures;
- contact you in connection with maintenance or improvement of our governance;
- to pass on to supporting agencies who will work with you in the future to ensure you receive the support you require – only with your prior consent.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations.

For any individual accessing our services we will hold your personal information on our systems for a maximum of 7 years from the date of discharge from our services. For any individual donating, volunteering or requesting information from Brighter Futures we will hold your data on our database until you request to be removed or for up to 10 years after our last contact or donation from you.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, including any special categories of personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact (c) Special categories of personal data	(a) Performance of a contract with you (b) Necessary for our legitimate interests as an NGO in the course of our legitimate activities
To process your donation: (a) Manage donations, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover funds donated to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how

(b) Asking you to leave a review or take a survey		customers use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Special categories of personal data	Necessary for our legitimate interests (to develop our services)
To protect the life of a data subject or another person, where the data subject is physically or legally incapable of giving consent	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Special categories of personal data	Necessary for vital interests
To carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Special categories of personal data	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation (c) Necessary for vital interests

### Who has access to your information?

If you are accessing Brighter Futures services or enquiring about accessing services, your information is disclosed only to those third parties who require your details to fulfil our requirements to you with your prior consent unless there are safeguarding concerns for a child's safety.

Brighter Futures acts as the information controller and works with a processor (database management software) to securely store and manage your information.

In the case of donors, volunteers and clients we may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings or provide you with support services). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties, beyond the Brighter Futures partners, for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law. For example: a court order or for the purposes of prevention of fraud or other crime.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do within the community, then you can select your choices by notifying us when we request your consent by email or post.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: [info@brighterfutures.org.je](mailto:info@brighterfutures.org.je) or phone: 01534 449152

## The right to be forgotten

Under the Data Protection (Jersey) Law 2018 all individuals have the right to have their personal data erased. Individuals can make a request for erasure verbally or in writing and we will respond to this request within one month. The right is not absolute and our legal obligations supersede above the right to be forgotten.

## How you can access and update your information

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If any of the information we hold is inaccurate or out of date, please email us at: [info@brighterfutures.org.je](mailto:info@brighterfutures.org.je) or by writing to Brighter Futures, The Bridge, Le Geyt, St Saviour, JE2 7NT. Alternatively, you can telephone 01534 449152.

You have the right to ask for a copy of the information Brighter Futures holds about you, to request this information please email [info@brighterfutures.org.je](mailto:info@brighterfutures.org.je). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## Security precautions and breach policy

When you give us personal information, we take steps to ensure that it's treated securely. We do not hold any payment details on record and information falling within special categories of personal data is stored on a secure database in accordance with best practice security methods and is never transferred without encryption in place.

In the event of personal data breaches, we will report directly to Information Commissioner of Jersey within 72 hours of becoming aware of the breach, where feasible. In the case of a high risk breach which affects our clients and donors, we will inform those individuals without undue delay.

## Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you from the information you have provided to us where we have received your prior consent in accordance with this privacy policy. We may make use of additional information about you when it is available from external sources listed in this policy to help us do this effectively.

## Use of 'cookies'

To make our website work properly, we sometimes place small data files called cookies on your computer or device. Most websites do this too. Our website is: [www.brighterfutures.org.je](http://www.brighterfutures.org.je) **What are cookies?** A cookie is a small text file that our website saves on your computer or mobile device when you visit one of our sites. It enables our website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another. **How do we use cookies?** We use cookies and other technologies to ensure everyone who uses our website has the best possible experience. Cookies also help us keep your account safe. By agreeing to this cookie policy, you are agreeing to the use of cookies and similar technologies for the purposes we describe in this policy. **What types of cookie are there, and which ones do we use?** There are two types of cookie:

- **Persistent cookies** remain on a user's device for a set period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.
- **Session cookies** are temporary. They allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Once you close the browser, all session cookies are deleted.

Category	Name of Cookie	Purpose	Expiration
Performance	__ga	This helps us count how many people visit the website by tracking if you've	2 years
Performance	__gat	This is used to manage the rate that page view request are made	10 minutes
Performance	__gid	Registers a unique ID that is used to generate statistical data	2 years
Performance	Collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks visitor across devices and marketing channels	Session

Category	Name of Cookie	Purpose	Expiration
Preference	NID	The NID cookie contains a unique ID Google uses to remember your preferences and other information, such as your preferred language (e.g. English), how many search results you wish to have shown per page (e.g. 10 or 20), and whether or not you wish to have Google's Safe-Search filter turned on.	6 months
Preference	Lang	Remembers the user's selected language version of a website	Session
Preference	1P_JAR	Set by Google. This cookie sets a unique ID to remember your preferences and other information such as website statistics and track conversion rates.	1 week
Preference	r/collect	This cookie is used to send data to Google Analytics about visitor's device and behaviour.	Session
Social Media	i/jot	Sets a unique ID for the visitor, that allows third party advertisers to target the visitor with relevant advertisements.	Session
Social Media	i/jot/syndication	Unclassified but d=set by Twitter	Session
Social Media	Local_storage_support_test	This cookie is used in context with the local-storage function in the browser. This allows the website to load faster by pre-loading certain procedures.	Persistent
Social Media	_widgetsettings	Unclassified but set by Twitter	Persistent
Social Media	guest_id	Provide guest ID	2 years
Social Media	personalization_id,	This cookie is set due to Twitter integration and sharing capabilities for the social media.	2 years
Social Media	twf_exp	This cookie is set due to Twitter integration and sharing capabilities for the social media.	1 month
Social Media	remember_check_on	Determine if user logged in during browser session; allow tweets; record number of times a page is tweeted.	10 years
Social Media	syndication_guest_id	Track visitor activity from Twitter Advertising platform	2 Days
Social Media	lang	Session-based cookie used for Sign-in with LinkedIn and/or for LinkedIn follow feature. This cookie is set due to Twitter integration and sharing capabilities for the social media.	Session
Social Media	_ncuid	Track visitor activity from Twitter Advertising platform	2 Years
Social Media	_twitter_sess	Provide micro-blogging feed	Session
Social Media	ads_prefs	Track visitor activity from Twitter Advertising platform	2 Years
Social Media	dnt, eu_cn,	Track visitor activity from Twitter Advertising platform	1 year
Social Media	external_referer	Track visitor activity from Twitter Advertising platform	7 Days
Social Media	_ncuid	Track visitor activity from Twitter Advertising platform	2 Years
Social Media	_twitter_sess	Provide micro-blogging feed	Session
Social Media	ads_prefs	Track visitor activity from Twitter Advertising platform	2 Years

## Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## 16 or Under

We aim to protect the privacy of children aged 16 or under. If you are aged 16 or under, we must obtain your parent/guardian's permission before processing your personal information.

## Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside Jersey and the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined below:

- Where we use certain service providers in third countries, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries. https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

If you use our services while you are outside Jersey or the EU, your information may be transferred outside Jersey or the EU in order to provide you with those services.

### **Review of this policy**

We keep this policy under regular review and may, at any time, revise this privacy statement. Where there are material changes to this privacy policy we will use reasonable endeavours to update you of these. This policy was last updated in May 2018.