

# Privacy Policy

## 1 Privacy Statement

We are committed to safeguarding your privacy. At all times we aim to respect any personal data you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy sets out our data collection and processing practices and your options regarding the ways in which your personal information is used.

Should you need to contact anyone at Endeavour regarding this policy please address your query to the DPO (Data Processing Officer) at:

Email: [info@endeavour.org.uk](mailto:info@endeavour.org.uk)

Phone: 0114 243 8219

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal data.

The provision of your personal data to us is voluntary. However providing us with your personal data means you will be able to, participate in our programmes, access our training, attend our meetings, make a donation, apply for employment, volunteering or other work with us and allow us to promote our offers and case studies more widely.

## 2 How we collect personal information about you

We may ask to collect personal information from you when you interact with Endeavour. There are lots of different examples of interaction which include: If you enquire about our work, or our events, if you make a donation, or apply for a job or volunteer with us or provide us with personal information if you participate in one of our projects or programmes. This may be when you phone us, email us, visit our website, and sign up to attend an event or training session, through the post or in person.

We will ask for personal information DIRECTLY if you wish:

- To access specialist support
- To attend our training
- To attend meetings or events
- When you apply for employment, volunteering or other work
- When you purchase services from us
- When you register for any of the programmes we deliver

### **3 What information do we collect?**

We may collect, store and use the following kinds of personal data:

- Your name and contact details
- Next of Kin or Emergency contact details
- Medical information
- Further information such as support needs for a disability or Faith requirement
- Consent to participate
- Consent to utilise photo or video images
- Postal address
- Telephone number
- E-mail address
- Any other information you have chosen to share with us

However, we may request other information where it is appropriate and relevant, for example

- Details of why you have decided to contact us and notes relating to any discussions in person or electronically
- Your bank details or debit/credit card details for processing payments;
- Photographic images of your likeness
- Details of your interests and participation in our work, surveys you have completed, etc

### **4 Do we process sensitive personal information?**

Applicable law recognises certain categories of personal information as sensitive and therefore require more protection including information for equal opportunities monitoring (where appropriate). We may also collect and store sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent or where the law requires us to do this.

How and why will we use your personal data?

Personal data, however it has been provided to us, will be used for the purposes specified in this Policy or in relevant parts of the website.

We may use your personal information to:

- Enable you to use any and/or all of the services we offer;
- Send you information about our work, campaigns, programmes and any other information, products or services that we provide. The channels we will use to do this are: phone, email, direct mail and digital advertisements (this will not be done without your consent and you may specify which channels of communication you prefer);

- Provide you with the services, products, programmes or information you have requested;
- Handle the administration of any donation or other payment you make via credit/debit card, cheque, standing order or BACS transfer;
- Collect payments from you and send statements and/or receipts to you;
- Handle the administration of your employment, volunteering or any other work you apply for and are engaged on;
- Conduct research into the impact of our events;
- Deal with enquiries and complaints made by or about you
- Make applications for accreditation by third parties, where you have registered
- Audit and/or administer our accounts.

## **5 Communications, fundraising and marketing**

Where you have provided us with your physical address, we will contact you by post; and where you have provided appropriate consent, also by telephone and e-mail, with targeted communications to let you know about our work, events, campaigns and other activities that we consider may be of particular interest; about the work of Endeavour and to ask for donations or other support.

## **6 Donations and other payments**

All financial transactions carried out on our website are handled through Just Giving and Stripe, third party payment services providers. We recommend that you read their privacy policies (available at <https://www.justgiving.com/about/info/privacy-policy/privacy-policy-v30> and <https://stripe.com/gb/privacy>) prior to effecting any transactions with us.

We will provide your personal data to these organisations only to the extent necessary for the purposes of processing payments for transactions you enter into with us. We reserve the right to change our third party payment service providers subject to the needs of our business, without need for notice, this Privacy Policy should therefore be checked regularly for updates. We do not store your financial details for any of these web based payments.

## **7 Children's data**

We may process data of people under the age of 18 that participate in our programmes. Where we do this information will be encrypted and access to this information limited to those staff requiring it in order to run the programme and provide necessary reporting only to our funders. We will securely store this information for a reasonable period and as required by company, funder or for legal reasons.

## **8 Other disclosures**

We will disclose your information to regulatory and/or government bodies and/or law enforcement agencies upon request only when required to do so in order to satisfy legal obligations which are binding on us.

## **9 Security of and access to your personal data**

We take the security of your personal information extremely seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and offline, from improper access, use, alteration, destruction and loss.

Your information is only accessible by appropriately trained staff, volunteers and contractors, or contracted agencies and/or suppliers who are processing data on our behalf.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with your informed consent.

## **10 Your rights**

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

- Right to be informed
  - You have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- Right of access
  - You can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we have 40 days to comply. As from 25 May 2018, we will have 30 days to comply.
- Right of erasure
  - As from 25 May 2018, you can ask us for your personal information to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it so that we have evidence of your request for audit purposes.
- Right of rectification

- If you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- Right to restrict processing
  - You have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- Right to data portability
  - to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information under your consent, because such processing is necessary for the performance of a contract to which you are party, to take steps at your request prior to entering into a contact or by automated means, you may ask us to provide this information to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details below.

We also have specific pages to unsubscribe from our email list which can be found in the footer of all our marketing emails.

Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we reserve the right to ask for personal identification and/or further information.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult ICO guidance – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> – or please contact us using the details below.

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner’s Office (“ICO”). For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>. The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

## **11 Lawful processing**

We are required to have one or more lawful grounds to process your personal information. Only 4 of these are relevant to us:

1. Personal information is processed on the basis of a **person’s consent**
2. Personal information is processed on the basis of a **contractual relationship**
3. Personal information is processed on the basis of **legal obligations**
4. Personal information is processed on the basis of **legitimate interests**

## **11.1 Consent**

We will ask for your consent to use your information to contact you by phone, send you electronic or postal communications such as newsletters and marketing and fundraising emails, for targeted advertising and profiling, and if you ever share sensitive personal information with us. Where our programmes are enhanced by the sharing of information (i.e. Local partnerships or training) we will ask your consent to share with other relevant parties.

## **11.2 Contractual relationships**

Many of our interactions with users are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to volunteer with us, if you book on our events, participate in programmes or purchase something from us.

## **11.3 Legal obligations**

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

## **11.4 Legitimate interests**

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals' rights).

We will rely on this ground to process your personal data when it is not practical or appropriate to ask for consent.

## **11.5 Achieving our mission**

- This includes (but not limited to) To assist young people to develop their full potential as individuals and as members of society.

## **11.6 Governance**

- Internal and external audit for financial or regulatory compliance purposes
- Statutory reporting

## **11.7 Publicity and income generation**

- Conventional direct marketing and other forms of marketing, publicity or advertisement
- Unsolicited commercial or non-commercial messages, including campaigns, newsletters, income generation or charitable fundraising
- Analysis, targeting and segmentation to develop and promote or strategy and improve communication efficiency
- Dissemination of our work through our website, publications, conferences, training events and social media
- Personalisation used to tailor and enhance your experience of our communications

## **11.8 Operational Management**

- Employee, contractor and volunteer recording and monitoring for recruitment, safety, performance management or workforce planning purposes
- Provision and administration of staff benefits such as pensions
- Physical security, IT and network security
- Maintenance of suppression files
- Processing for historical, scientific or statistical purpose

## **11.9 Purely administrative purposes**

- Responding to enquiries
- Delivery of requested products or information
- Communications designed to administer existing services including administration of programmes and financial transactions
- Thank you communications and receipts
- Maintaining a supporter database and suppression lists

## **11.10 Financial Management and control**

- Processing financial transactions and maintaining financial controls
- Prevention of fraud, misuse of services, or money laundering
- Enforcement of legal claims
- Reporting criminal acts and compliance with law enforcement agencies

When we use your personal information, we will consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information legally and fairly.

## 12 Data retention

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed as outlined in our Data Retention Schedule, we remove your personal information from our records. However, if before that date your personal information is no longer required in connection with such purpose(s), we are no longer lawfully entitled to process it or you validly exercise your right of erasure, we will remove it from our records at the relevant time.

The below list is an example of some of our specific retention periods, please note this list is not exhaustive and is determined by the purpose we collected your data.

Record	Retention period
Accident books, accident records, accident reports	Three years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches age 21).
Accounting records	Six years
Application forms and interview notes (for unsuccessful candidates)	Six months.
Assessments under health and safety regulations and records of consultations with safety representatives and committees	Permanently.
Control of Substances Hazardous to Health Regulations (COSHH) records of tests and examinations of control systems and protective equipment	Five years from the date on which the tests were carried out.
DBS certificate information	Three years or until superseded if less.
Driving licence, vehicle insurance, MOT certificate details	One year after expiry unless renewed.



Record	Retention period
Expatriate records and other records relating to foreign employees (e.g. visa, work permits, etc.)	Six years after employment ceases.
Income tax and NI returns, income tax records and correspondence with HMRC	Not less than three years after the end of the financial year to which they relate.
Parental leave records	Five years from birth/adoption of the child or 18 years if the child receives a disability living allowance. <i>Recommended.</i>
Personnel files and training records (including disciplinary records and working time records)	Six years after employment ceases.
Records relating to children and young adults	Until the child/young adult reaches age 21.
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Six years from the date of redundancy.
SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	Three years after the end of the tax year in which the leave period ends.
Statutory Sick Pay records, calculations, certificates, self-certificates	Six years after the employment ceases.
Trust deeds and rules	Permanently.

Record	Retention period
Trustees' minute books	Permanently.
Wage/salary records	Six years.

In the event that you ask us to stop sending you direct marketing / fundraising / other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

### **13 Data storage and transmission**

How information is stored:

- Physical personal information is kept in non-portable locked cabinets with access limited to those who need to see it eg staff employment & payroll records accessed by senior management and HR/finance staff, young people's consent forms accessed by operational staff.
- Electronic data is stored at the following Microsoft datacentres:
  - Exchange Online - United Kingdom
  - Exchange Online Protection - European Union
  - Microsoft Teams - United Kingdom
  - OneDrive - United Kingdom
  - SharePoint - United Kingdom
  - Viva Connections - European Union
- Electronic data on SharePoint is stored and encrypted with one or more AES 256-bit keys. Sensitive data (eg payroll records) is also saved in password protected documents.
- Email is encrypted:
  - At rest - Bitlocker
  - In transit - DKIM and TLS

### **14 Policy amendments**

We keep this Privacy Policy under regular review and reserve the right to update from time-to-time by posting an updated version on our website, not least because of changes in applicable law.

We recommend that you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of any important changes to our privacy policy by email.

This Privacy Policy was last updated on 19 March 2025.

## **15 Third party websites**

We link our website directly to other sites. This Privacy Policy **does not** cover external websites and **we are not responsible** for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website. Updating your information on third party websites will not be shared with us unless you give consent or there is a legal or contractual reason for processing.

## **16 Updating information**

You may ask us at any time to update your details, correct or remove information you think is inaccurate or to check the information we hold about you by contacting us via post or email.

## **17 Breaches**

All data breaches will be assessed using the Information Commissioners Office (ICO) Self-Assessment tool to determine whether the breach needs to be reported to the ICO.

You will be notified of any breach, the nature of this, what has happened, the likely consequences and any action being taken by us. You will also be provided with contact details of the person to refer to for more information.

## **18 Contact**

We are registered with the Information Commissioners Office (ICO). The Chief Executive is our Data Processing Officer. Please let us know if you have any queries or concerns whatsoever about the way in which your data is being processed by either emailing us at [info@endeavour.org.uk](mailto:info@endeavour.org.uk), telephone 0114 243 8219 or writing to us at Endeavour Centre, Earl Marshal Road, Sheffield, S4 8FB.