

The Bromley Homeless Shelter Privacy Statement

1. Statement of intent

The purpose of this statement is to be transparent about how The Bromley Homeless Shelter will collect, use and protect the personal information provided to us.

Personal data is information that relates to identifiable living individuals. The Bromley Homeless Shelter will act in accordance with current legislation and meet current best practice with regard to the processing of personal data. We are committed to safeguarding your personal information.

If you have any queries about this privacy statement, please contact the Data Protection Officer, The Bromley Homeless Shelter, Bromley United Reformed Church, 20 Widmore Road, Bromley, Kent, BR1 1RY or email bromleyshelter@tbhs.co.uk.

1.1 Who we are

The Bromley Homeless Shelter is a registered charity number 1163353 run by Bromley Churches to help homeless people, giving preference to those who have a connection to Bromley Borough.

The Charity provides:

- **Welfare Advice.** We offer an advice service on benefits and homelessness at the United Reformed Church in Widmore Road, Bromley.
- **A Night Shelter.** During the coldest and most difficult time of the year (November to March), we operate a Night Shelter for homeless people. In the evenings we share a meal together in a central Bromley location. Our guests then sleep overnight in a warm, safe hall and in the morning are served a hot or cold breakfast.

2. Collection of personal data

In any contact you have with The Bromley Homeless Shelter, you may provide certain personal data to us which we will compile and process in accordance with this Privacy Statement. By providing such information you agree to its use and storage in accordance with the provisions of this Privacy Statement. For example, this might occur when you engage with our social media, make a donation to us, make use of our advice service, register as a guest, or volunteer. When you do so, we may ask for personal information, like your name, email address and telephone number to store with your account.

Data protection law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data and covers health information, race, religious beliefs, criminal records and political opinions. Due to the nature of our work we may collect sensitive information on our guests, clients and volunteers. In such an event, clear notices will be provided so that it is clear what information we need and why we need it.

3. How we use your personal data

The Bromley Homeless Shelter shall only use your data for the purposes for which it is provided or where there is a lawful basis. For example by providing your name, address, email address and telephone number we are able to contact you about your fundraising activities, volunteering for the shelter, donations and supporters schemes (e.g. Friends and Patrons).

When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal grounds available to us under Data Protection law. One of these is where we have obtained your specific consent to use your information for a previously notified purpose, such as to send you an email or text keeping you informed of our activities.

In certain instances, we may collect and use personal information where this is necessary in our legitimate interest as a charity, this includes being able to:

- schedule volunteers as cooks, cooks teams, for overnight stays in the shelter, or
- register guests in the shelter taking into account their specific needs and backgrounds.
- maintain and administer our donor database and systems.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Policy and that does not intrude on your privacy.

Where we process sensitive personal data (as mentioned above), we will make sure that we only do so in accordance with one of the additional lawful grounds for processing such as where we have your explicit consent or you have made that information manifestly public. When we do this, we will tell you what sensitive personal data we are collecting and why.

3.1 Marketing materials

We want to ensure you receive the level of information about The Bromley Homeless Shelter that is right for you. If you actively provide your consent to us along with your email address, we may contact you for marketing purposes by email. By subscribing to The Bromley Homeless Shelter emails or opting in to email communication from The Bromley Homeless Shelter, you grant us the right to use the email for the purposes specified when you opt-in.

We will not use your personal information for email marketing purposes if you have indicated that you do not wish to be contacted by us for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

You may opt-out of our email marketing communications at any time by email to bromleyshelter@tbhs.co.uk or by using an unsubscribe link in our emails.

4. Third parties

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

We may need to share your information with "data processors" such as our service providers, associated organisations and agents who help us to prepare and send the materials relating to our projects and fundraising activities. These "data processors" will only act under our instruction and we will not allow these organisations to use your data for their own purposes and will take care to ensure that they keep your data secure.

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

5. Storage and correction of personal data

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of donations for at least ten years. If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

The accuracy of your information is important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us:

- (i) by post: The Bromley Homeless Shelter, Bromley United Reformed Church, 20 Widmore Road, Bromley, Kent, BR1 1RY
- (ii) or by email: bromleyshelter@tbhs.co.uk

Under current data protection law you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We require you to prove your identity with two pieces of approved identification.

6. Links to other websites

Our website may, from time to time, contain links to and from the websites of other persons. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for them. Please check those policies before you submit any personal data to those websites.

7. Changes to this policy

We may make changes to this Privacy Policy by posting the new version on this website.

Last updated 16 April 2020