

Privacy Policy: Recipients of the Rose Vouchers Project



Alexandra
Rose
Charity

Privacy

Policy Date: May 26

Review Date: May 27

This Privacy Policy describes how Alexandra Rose Charity (referred to here as "**ARC**" or "**we**") collects and processes your personal data in relation to the Rose Vouchers Project and how you can exercise your privacy rights. ARC is a registered charity whose registered office is Community Base, 113 Queens Road, Brighton, BN1 3XG. ARC is registered with the Charity Commission for England & Wales – Charity Number 211535 and The Scottish Charitable Incorporated Organisation Charity Number SC052479.

ARC uses the ARC V-Store to record, store and process the personal data of people who use our services, including family contacts, carers, voucher recipients, and participants in the fruit and vegetable on prescription project, known as the Rose Vouchers Project (defined below). This information is used only to administer, deliver and evaluate the impact of the Rose Vouchers Project, by ARC and its partner organisations involved with the project. Personal data is not disclosed to any third parties that are not involved in the administration, delivery and evaluation of the Rose Vouchers Project.

ARC takes your privacy very seriously. The policies and procedures we have in place are to protect the integrity and confidentiality of personal data, to comply with data protection legislation including the UK General Data Protection Regulation (**UK GDPR**). If you have any questions about how we use personal data or about this Privacy Policy, please contact info@alexandrarose.org.uk

Definitions

Admins means personnel from ARC and its technology, delivery & evaluation partners.

ARC V-Store means the project management software used to operate our programmes.

Bridging the Gap is our subsidised retail project, where Rose Vouchers can be exchanged for subsidised organic Fruit and Vegetables and purchased by members of the public at a subsidised cost.

Delivery Partners includes the personnel at children's centres, local authorities and other community partner organisations who are responsible for entering and uploading information that is received from Users who partake in the Rose Vouchers Project within the UK. They

identify new Recipients who are eligible to become part of the Rose Voucher Project and record their Rose Voucher collection activities onto the ARC V-Store.

Personal data means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data or an online identifier.

Rose Vouchers Project means the ARC led project whereby Recipients receive Rose Vouchers from Delivery Partners which they can exchange at certain Trader locations in exchange for fresh fruit and vegetables. The project operates across the UK and includes (i) an early years programme to supply fresh fruit and vegetables to families with young children and (ii) a fruit and vegetable prescription programme for adults with diet-related health conditions.

Rose Vouchers are the vouchers which Recipients receive from Delivery Partners and exchange for fruit and vegetable from Traders.

Recipients means the parents or nominated care giver who receives the Rose Vouchers for their children and/or individuals participating in the Rose Vouchers Project.

Participants means the individuals participating in our Fruit and Vegetable on Prescription project and our Bridging the Gap project.

System Administrators means personnel from third-party technology services that maintain our data servers, including our ARC V-Store.

Traders means the people or organisations which operate a local market stall or retail outlets or mobile fruit and vegetable vehicles and who have signed up to accept Rose Vouchers from Recipients in exchange for fresh fruit and vegetables.

What personal data do we collect and why?

In order to join the Rose Vouchers Project, we need to collect certain basic personal data about Recipients. This is necessary for us to operate our programmes.

In order to deliver the following programme streams, we need to collect the following personal data:

Programme A: For early years Rose Vouchers Project

When a Recipient registers, we collect the following personal data:

- The parent or main carer's full name
- The parent or main carer's contact details (email address or telephone number)
- Names of other people who are permitted by the parent or main carer to collect the Rose Vouchers
- DOB of eligible children
- Pregnancy due date (if applicable)
- Ethnicity

- Main language/s spoken
- Whether or not the family is applying for, receiving, or rejected/not eligible for the Healthy Start or Best Start scheme and the date a family informs their centre that their application to Healthy Start is successful or unsuccessful
- Whether or not they have access to public funds
- Signature of the person registering
- Upon a family leaving the Rose Vouchers Project, we will also record the reason for leaving

Programme B: For fruit and vegetable on prescription

- The participant's full name
- The participant's contact details (email address or telephone number)
- Names of other people who can collect the Rose Vouchers
- Number of children in the household
- Number of adults in the household
- Household members' date of birth (used to determine household size and number of children)
- Information about the food and shopping habits of the participant and their family

Programme C: For Bridging the Gap

- Participants registered under the Rose Voucher project personal data collected is the same as Programme A
- Participants registered under fruit & veg on prescription personal data collected is the same as Programme B

In all the above programme streams, when participants or carers pick up Rose Vouchers, we collect:

- Full name of the person collecting the Rose Vouchers
- Date of collection
- Centre attended

Our approach to handling special category data for any these above programmes is identified below under 'special category data'.

Retention of personal data

All personal data is obtained for the purposes of administering, delivering and evaluating the Rose Vouchers Project, and will not be kept for longer than necessary for these purposes.

To this end, ARC will undertake regular data cleansing of its systems (including the ARC-V Store), when personal data that is no longer required will be permanently deleted. When

evaluating the impact of our programmes, we also anonymise personal data wherever practical. In addition to our commitment to regular data cleansing, individuals have the legal right to have personal data erased and to prevent processing – please see “The right to erasure” below.

Our legal basis for processing personal data

Legitimate interests

Under the UK GDPR, we generally process Recipients' personal data for the purposes of our legitimate interests in operating our programmes. Broadly speaking, this means we can process personal data if we have a genuine and legitimate reason to do so; the processing is necessary to achieve that purpose, and our processing doesn't overly interfere with those individuals' interests, rights and freedoms.

For the purposes of the Rose Vouchers Project, we process Recipients' personal data to carry out our charitable mission, which includes tackling poverty and diet-related ill health, strengthening local markets, and helping to build more sustainable local food economies.

In order to rely on legitimate interests, we also carefully consider your interests and the impact our processing has on you, including how you benefit from our programmes, how important those benefits are, and if our processing is necessary, proportionate and reasonable. Our balanced assessment is that processing the personal data of Recipient's is necessary, proportionate and reasonable, and is clearly in the interests of ARC for its charitable purposes. Crucially, it is also clearly in the interests of Recipient's who benefit from the Rose Vouchers Project through help to improve their families' health and wellbeing, including free access to fresh fruit and vegetables and a programme of support from community partners.

Special category data

As part of providing our services, we may also process personal data about Recipients health status (such as mental and physical health) or their ethnic background (such as the language/s spoken). This data is referred to as special category data and is subject to additional safeguards under UK GDPR because this personal data is inherently more sensitive in nature. Where we process special category data, our legal basis for doing so is that the processing is carried out in the course of our legitimate activities as a not-for-profit organisation and in connection with our charitable mission and is subject to appropriate safeguards and not disclosed outside ARC without your consent.

ARC Mailing Lists

You can also subscribe to ARC's mailing list by providing us with your contact details via our website www.alexandrarose.org.uk. If you choose to receive electronic communications from ARC (such as newsletters and fundraising information by email), then we will need your consent to communicate with you in this way. This is because such communications may be

deemed to be 'marketing' for which your explicit consent would be required under the Privacy and Electronic Communications Regulations (PECR), which sits alongside the UK GDPR.

Our website contains all the necessary information regarding consent and opting in to receive electronic communications. ARC only uses email addresses to send relevant information. We do not pass on personal data to third parties unconnected with ARC. Recipients can unsubscribe simply by clicking the link at the foot of ARC's emails or by emailing info@alexandrarose.org.uk

Disclosing your personal data

We will not share any personal data with a third party except where:

- We are transferring data to one of our third-party service providers, such as those we engage to:
 - Host our Rose Voucher system
 - Send email communications, such as newsletters, on our behalf
 - Provide project management software necessary to operate our programmes
 - Administer and process donations to ARC
 - Carry out finance and accounting services on our behalf
- We are required to do so by applicable law
- To exercise, establish or defend our legal rights
- We have obtained your consent

Transferring your personal data overseas

Some of our third-party service providers are located and/or process personal data outside the UK. For example, we use Socialsuite for data analytics, and they are based in Australia. When we transfer your information to them, we take appropriate measures to safeguard your personal data, for example, by entering into a contract that includes the international data transfer addendum to the European Commission's standard contractual clauses for international data transfers issued by the Information Commissioner's Office or by transferring the data to a country that has been designated as providing adequate safeguards for personal data.

Your rights

The UK GDPR contains important rights for individuals:

- **The right of access** – ARC will provide, on request by an individual, a copy of the personal data ARC holds about them free of charge. This is called a 'subject access request', and

ARC will respond as soon as we possibly can but at the latest within one month of receipt of a request. In some instances we may be permitted to extend the timeframe in which we respond.

- **The right to rectification** – Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.
- **The right to erasure** – This is also known as ‘the right to be forgotten’. The broad principle underpinning this right is to enable an individual to request the entire deletion or removal of all personal data where there is no compelling reason for its continued processing. The right to erasure does not provide an absolute ‘right to be forgotten’, but individuals have a right to have personal data erased and to prevent processing in specific circumstances:
 - o where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
 - o when the individual withdraws consent; and
 - o when the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- **The right to restrict processing** – Individuals have a right to ‘block’ or suppress processing of personal data. When processing is restricted, ARC is permitted to store the personal data, but not further process it. ARC can retain just enough information about the individual to ensure that the restriction is respected in future.
- **The right to object** – Individuals have the right to object to direct marketing (including profiling) and processing for purposes of historical research and statistics. The UK GDPR defines "profiling" as any form of automated processing intended to evaluate certain personal aspects of an individual, in particular, to analyse or predict their economic situation, health, personal preferences, reliability, behaviour, location or movements.
- **Rights in relation to automated decision making and profiling** – The UK GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention.

Please note that the Right to data portability under the UK GDPR does not apply when Legitimate Interests are used as the lawful basis for data processing.

Changes to this Privacy Policy

We may make changes to ARC V-Store to add, for example, new features. As a result of these changes, and if there are any changes in applicable law, we may make changes to how we process your Personal Data. If and when we make such changes, we will update this Privacy Policy, so please check it regularly. If these changes have a material impact on your privacy rights, we will notify you.

Complaints

If you have any complaints about the way in which we use or have used your personal data, please get in touch with us using the details in the ‘Contact us’ section below. We would be

happy to help and discuss your concerns.

You are also entitled to make a complaint to the [Information Commissioner's Office](#)

Contact us

To contact ARC about exercising any of your data subject rights, such as to make a subject access request or to rectify personal data that is inaccurate or incomplete, please email info@alexandrarose.org.uk.

To find out more about your rights, you can also visit <https://ico.org.uk/for-the-public/>

Surveys and evaluation activities

From time to time, ARC may run surveys that will offer you the option to provide your email address for further contact from ARC and our delivery & evaluation partners.

Use of Cookies and Other Technologies

A Cookie is a small piece of data containing a unique reference which is written to a web-enabled user device such as a computer, smartphone, tablet and/or other device running a web browser capable of connecting a person to the internet. For ARC V-Store, we only use this technology for authentication purposes only, i.e. recognising when a user from a Children's Centre, Local Authority or other Community Partner organisation is logged in to ARC V-Store. The Cookies themselves in ARC V-Store do not contain any personal data. From time to time, ARC may also use Google Analytics to gather non-personally identifiable information on users. This information helps us understand how ARC V-Store is being used and is gathered through cookies and code embedded in ARC V-Store.

Other Relevant Policies

Data Handling Principles

Privacy Policy - General

Privacy Policy - Rosie App

Data protection
