Euston Food Bank Data Protection Policy

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Data Protection Lead	**The Interim Chief Exectute, Daphine Aikens**
Trustee with Lead Data Protection Responsibilities	**……** **(or if none)** **The Chair of the Trustees, Jonathan Lee**

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1. Statement of Intent

Euston Food Bank is committed to protecting the privacy and security of personal data. We recognise the importance of maintaining the confidentiality of personal information about our beneficiaries, supporters, volunteers, staff, and trustees.

This policy sets out our commitment to comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and all other applicable data protection legislation. We are registered with the Information Commissioner's Office (ICO) as a data controller under registration number ZA250016

Euston Food Bank will ensure that all personal data is:

- Processed lawfully, fairly, and transparently
- Collected for specified, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Kept for no longer than necessary
- Processed securely with appropriate technical and organisational measures
- Processed in accordance with the rights of data subjects

2. Scope and Purpose of this Policy

2.1 Scope

This policy applies to all personal data processed by Euston Food Bank in connection with our food bank activities, including but not limited to:

- Beneficiary data collected through vouchers and referrals
- Supporter and donor information
- Volunteer records and information
- Staff employment records
- Trustee information
- Any other personal data processed in the course of our activities

This policy applies to all employees, volunteers, trustees, and contractors who process personal data on behalf of Euston Food Bank. It covers all personal data regardless of the format in which it is held (paper, electronic, or otherwise) and the location where it is stored.

2.2 Purpose

The purpose of this policy is to:

- Establish a framework for data protection compliance across all food bank activities
- Set out the responsibilities of staff, volunteers, and trustees in relation to data protection
- Ensure that personal data is processed in accordance with UK GDPR and DPA 2018
- Protect the rights and privacy of individuals whose data we process
- Minimise the risk of data breaches and ensure appropriate responses when they occur
- Provide clear guidance on data protection practices and procedures

3. Who This Policy Applies To

All employees, volunteers, trustees, and contractors of Euston Food Bank are required to adhere to this policy. This policy is designed to protect the personal data of data subjects including our beneficiaries, supporters, volunteers, employees, and trustees.

Written data protection guidance is provided to help staff and volunteers comply with this policy and relevant data protection legislation in the document titled "understanding-your-responsibilities-for-data-protection".

4. Roles and Responsibilities

4.1 Trustee Board

The Trustee Board has overall responsibility for ensuring compliance with data protection legislation and is accountable for:

- Approving this Data Protection Policy and any subsequent revisions
- Ensuring adequate resources are allocated to data protection compliance
- Receiving regular reports on data protection compliance and incidents
- Ensuring the organisation maintains its ICO registration

4.2 Data Protection Lead

Euston Food Bank's Data Protection Lead has day-to-day responsibility for data protection and is required to:

1. Provide compliance advice and guidance to staff, volunteers, and trustees
2. Ensure that staff and volunteers receive appropriate data protection training
3. Ensure that Euston Food Bank's data protection policies and documents are appropriate and up to date
4. Act as the focal point for the administration of subject access requests
5. Handle data subject rights requests relating to erasure, objection, restriction, and rectification
6. Log, assess, and manage all personal data breaches
7. Report applicable data breaches to the ICO within the statutory 72-hour time limit
8. Maintain and renew Euston Food Bank's ICO registration annually
9. Keep a central register of all organisations that Euston Food Bank shares personal information with
10. Maintain and update the organisation's Records of Processing Activity, Privacy Notices, and data protection impact assessments
11. Monitor compliance with this policy and report to the Trustee Board
12. Report data protection issues to the Board of Trustees via the Company Secretary
13. Act as the primary contact for the ICO and data subjects on data protection matters

4.3 Trustee with Lead Data Protection Responsibilities)

The Trustee with Lead Data Protection Responsibilities, or (if none) the Chair of the Trustees, has ultimate compliance authority for data protection and is responsible for:

1. Providing strategic oversight of data protection compliance across the organisation

2. Receiving data protection reports from the Data Protection Lead (Food Bank Manager)
3. Presenting data protection issues to the Board of Trustees
4. Ensuring the Board of Trustees fulfils its data protection governance responsibilities
5. Having ultimate accountability for data protection compliance within the organisation

4.4 All Staff and Volunteers

All staff and volunteers are responsible for:

1. Working in compliance with the data protection principles as set out in this policy and Euston Food Bank's data protection guidance document
2. Ensuring that any personal information they provide to Euston Food Bank is accurate and kept up to date
3. Processing personal data only in accordance with their role and this policy
4. Keeping personal data secure and not disclosing it to unauthorised persons
5. Reporting any personal data breach or suspected breach immediately to the Data Protection Lead
6. Completing mandatory data protection training as required
7. Directing data subject rights requests to the Data Protection Lead

4.5 Contractors and Third Parties

Any contractors, consultants, or third parties who process personal data on behalf of Euston Food Bank must comply with this policy and sign a data processing agreement that sets out their specific responsibilities and obligations under data protection law.

5. Key Definitions

Data protection law applies to how we process people's personal information. The key terms are:

Controller – Euston Food Bank is a controller as it collects and decides how personal information will be used.

Data Protection Principles – The rules that we must follow when processing personal information.

Processing - What we do with personal information, including collecting, recording, storing, sharing, and using it.

Personal Data - Information that can be used to identify a person, held in any format including computer systems, mobile devices, or paper files. Examples include: name, address, date of birth, bank account details, email address, telephone number.

Special Category Personal Data – Sensitive information about a person's health, religion, political opinion, trade union membership, race or ethnic origin, sex life, sexual orientation, genetic data, or biometric data.

Data Subject - The person whose personal information is being processed (e.g., a beneficiary, supporter, volunteer, employee, or trustee).

Privacy Notice – A notice provided when collecting personal information to inform people how their data will be used.

Privacy Policy – The detailed document explaining how we use personal information. Euston Food Bank's privacy policy is available via our website: Euston Foodbank | Helping Local People in Crisis

Data Processor – An organisation that processes personal information on our behalf (e.g., an IT service provider or mailing house).

Data Breach – A security incident that leads to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

Information Commissioner's Office (ICO) - The UK's independent regulatory body responsible for enforcing data protection law.

6. Data Protection Principles

All staff and volunteers must comply with the data protection principles when processing personal data. Personal information must be:

1. Processed lawfully, fairly, and in a transparent manner
2. Collected only for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary (data minimisation)
4. Accurate and, where necessary, kept up to date
5. Kept for no longer than necessary for the purposes for which it is processed
6. Processed securely with appropriate technical and organisational measures to protect against unauthorised or unlawful processing and accidental loss, destruction, or damage
7. Processed in accordance with the rights of data subjects

Euston Food Bank, as the data controller, is responsible for demonstrating compliance with these principles (accountability principle).

7. Data Subjects

Euston Food Bank's data subjects include: beneficiaries, supporters, donors, volunteers, employees, trustees, contractors, and any other individuals whose personal data we process in connection with our activities.

8. Data Processing Purposes

Euston Food Bank processes personal information for the following purposes:

- Providing emergency food assistance to people in crisis
- Processing and managing voucher referrals
- Collecting and analysing statistics to understand food bank usage and need
- Managing donations, gift aid claims, and supporter relationships
- Recruiting, training, and managing volunteers
- Recruiting and employing staff
- Communicating with supporters about our work and fundraising activities
- Developing case studies and stories (with appropriate consent) to promote our work
- Complying with legal obligations and governance requirements
- Safeguarding vulnerable adults and children

9. Legal Basis for Processing

Euston Food Bank's legal basis for processing personal information is documented in our Record of Processing Activity (ROPA). We process personal data on the following legal bases:

- **Legitimate interests** - where processing is necessary for our organisational objectives and does not override the rights and freedoms of data subjects
- **Consent** - where data subjects have given clear consent for specific purposes
- **Legal obligation** - where processing is necessary to comply with the law
- **Vital interests** - where processing is necessary to protect someone's life

10. Data Subject Rights

Euston Food Bank respects the rights of data subjects under UK GDPR, including:

- **Right to be informed** - through privacy notices when we collect personal data
- **Right of access** - to obtain a copy of their personal data we hold
- **Right to rectification** - to have inaccurate or incomplete data corrected
- **Right to erasure** - to have personal data deleted where there is no compelling reason for continued processing
- **Right to restrict processing** - to request limitation of processing in certain circumstances
- **Right to data portability** - to receive personal data in a structured, commonly used format
- **Right to object** - to object to processing based on legitimate interests or for direct marketing

Data subjects can exercise these rights by contacting the Data Protection Lead. See the guidance document "understanding-your-responsibilities-for-data-protection" for detailed procedures on responding to data subject requests.

11. Data Security

All staff, contractors, and volunteers must ensure that personal data is kept secure, whether held electronically or in paper form. Security measures include:

- Paper records stored in locked cabinets with restricted access
- Electronic data protected by passwords and encryption where appropriate
- Personal data not left unattended on desks or in vehicles
- Secure disposal of paper records (shredding) and electronic data
- Regular backups of electronic data
- Access to personal data limited to those who need it for their role

Unauthorised disclosure of personal data will be treated as a serious matter and may lead to disciplinary action, including dismissal for gross misconduct.

12. Data Breaches

A data breach must be reported immediately to the Data Protection Lead. Examples of data breaches include:

- Loss or theft of devices containing personal data
- Unauthorised access to or disclosure of personal data

- Loss of paper records
- Sending personal data to the wrong recipient

The Data Protection Lead will assess each breach and, where required by law, report it to the ICO within 72 hours. Affected individuals will be notified if the breach is likely to result in a high risk to their rights and freedoms.

13. Training and Awareness

Data protection training will be provided during induction for all new staff and volunteers. Refresher training will be provided as needed when policies change or incidents occur.

All staff and volunteers must familiarise themselves with this policy and the supporting guidance document. They are expected to comply with the policy at all times and ask for clarification if unsure about any aspect of data protection.

14. Policy Monitoring and Review

The Data Protection Lead is responsible for monitoring compliance with this policy and will report annually to the Trustee Board on:

- Compliance with data protection legislation
- Data breaches and incidents
- Subject access requests and other data subject rights requests
- Training completion rates

This policy will be reviewed annually or sooner if there are significant changes to legislation, guidance, or our operations. The document control information at the beginning of this policy records the version history and approval details.

15. Complaints and Concerns

Anyone who believes this policy has not been followed should raise the matter with the Data Protection Lead in the first instance. If the concern is not resolved, they may contact the ICO directly at ico.org.uk or by calling 0303 123 1113.

16. Status of This Policy

This policy does not form part of any formal contract of employment, but compliance is a condition of employment or volunteering with Euston Food Bank.

Any breach of this policy may lead to disciplinary action, up to and including dismissal or termination of volunteering arrangements. In serious cases, breaches may also result in criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy should be directed to the Data Protection Lead.

17. Related Documents and Guidance

This policy should be read in conjunction with:

- Understanding Your Responsibilities for Data Protection (guidance document)
- Privacy Policy (available on our website)
- Privacy Notices (for beneficiaries, volunteers, staff, etc.)
- Record of Processing Activity (ROPA)

- Data Retention Schedule
- Information Security Policy (if applicable)

End of Policy

Appendices

Euston Foodbank
28 Phoenix Road
London
NW1 1TA

Contact: Euston Foodbank's Data Protection Lead: Daphine Aikens
Tel: 020 4615 9770
Email: daphine@euston.foodbank.org.uk

Information Commissioner's Office (ICO) registration number ZA250016

Privacy Notice

Euston Foodbank is a data controller registered with the UK Information Commissioner's Office registration number ZA250016.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.

We have policies, procedures and training in place to help our people understand their data protection responsibilities and follow the principles of data protection.

We have a nominated member of staff who is responsible for oversight of our Data Protection responsibilities. If you have any questions regarding our privacy notice, please email info@euston.foodbank.org.uk

This privacy notice relates to personal information that Euston Foodbank collects and uses. We are an independent organisation which is part of the Trussell Foodbank Network. We share personal information about food bank use with Trussell which is a separate data controller. Trussell directly supports over 1400 food bank centres throughout the UK which together represent the Foodbank Network. For more information about who we share your personal data with please visit the "Sharing personal information" section below.

How we collect personal information
We may collect your personal information from you directly when:

- communicate with us for any reason, by post, telephone, text, email or via our website
- make a donation
- visit a food bank or are referred to a food bank for support
- participate in a survey or research
- work or make an application to work or volunteer for us
- agree to help us promote our work
- interact with us as a supplier, contractor, consultant or in any other capacity.

We may also collect personal information about you from other organisations. For example, from a referral agency like a doctor's surgery, when you are referred to the food bank.

The personal information that we collect
We only collect personal information that we genuinely need.
This may include:

- For people referred to the food bank:
    - We will keep the data that you provided when referred for a foodbank voucher(s) including your name; address; and year of birth;
    - information about your household, including the number of other adults and children living with you;
    - the reason you were referred and your explicit consent where appropriate.
    - We will also keep a record of who gave you the foodbank voucher;
    - With your consent, your phone number so the food bank can contact you about any support available.
    - where you give your explicit consent any dietary requirements;
    - With your explicit consent, Ethnicity information for equalities monitoring purposes
- Financial information that you provide to us, for example, payment information when making a donation, including any gift aid declaration you make
- Contact information you provide when donating food, support one of our campaigns, or signup to receive communications from us.
- For job and volunteer applicants:
    - your bank account details, tax and residency status
    - references from previous employers or educational institutions
    - contact details for your family members and next of kin
    - qualifications
    - information concerning your health and medical conditions
    - information about your race, ethnicity and sexual orientation
    - details of unspent criminal convictions.

Our legal basis for processing personal information
Our legal basis for processing personal information is usually for our legitimate interests, or your consent, for the performance of a contract or to meet our legal obligations.

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.
We will ask you to opt in to receiving marketing emails and text messages from us. You can unsubscribe from this at any time.
Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe someone's life is at risk.
We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract), or because we are legally obliged to do so, for example to meet employment or charity laws.

Why we collect personal information
We collect and use personal information about people who use food banks, supporters, job applicants and volunteers for a number of reasons.

Assisting people that use food banks
We collect personal information from you directly from you when you visit the food bank, or via an organisation that refers you to a food bank for support. Our legal basis for using this information is legitimate interest as we wish to respond to your need for help, and ensure that we are providing help when and where it is most needed.
In some situations, we may ask you for sensitive (special category) information, for example about your health or your ethnicity. We use this information to ensure we're providing you with appropriate support and to help us to better understand if we're meeting the needs of different groups in our communities. This is sensitive personal information, and we need your explicit consent to hold it. You can choose not to provide this information and it won't affect the help you receive in any way. If you provide ethnicity information, it cannot be seen by others and once you collect your parcel this information is anonymised (so that it can't be linked to you).
We share information about people who use food banks with Trussell which works with us and other food banks across the UK. Trussell uses anonymised statistical data to campaign at a national level to challenge the structural issues that lock people into poverty.

Developing relationships with supporters
Our work is made possible because of the generosity of our supporters. We need a good understanding of our supporters so that we can communicate with them effectively and appropriately. We will only send you marketing communications via email or text where you have opted in to receiving them. You can unsubscribe from receiving these communications at any time by contacting Euston Foodbank Data Protection Lead.
We may research our existing and prospective supporters to develop a better understanding of their interests and actions in support of our work. We use publicly available data sources (such as the Electoral Register, Companies House, public social media accounts such as LinkedIn, company websites, political and property registers, and news archives to supplement the personal data we already have. We may also use the research to profile our financial supporters in order to make appropriate requests to people who have the means and the desire to give more.

Processing donations

If you kindly make a donation to us (of food or money), we will use your personal information to collect your donation and maintain a record of our supporters. Our legal basis for using your personal information for this purpose is to meet our legal obligations, and to fulfil our legitimate interest and fundraising objective. We are legally required by HMRC to collect some personal information, for example, where you choose to gift aid your financial donation.

Dealing with complaints and appeals
If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal in line with our complaints policy. This may include sharing relevant information with Trussell or person that the complaint has been made about. Our legal basis for using personal information for this purpose is legitimate interest.
If you make a complaint about an individual and this forms part of their personal data and the individual requests access to it, we will seek to remove personal information identifying you first. In some situations, we may be obliged to provide your personal data. Where appropriate we will seek your consent before providing the information but may be required to provide this even if you do not consent.

Promoting our cause
We work alongside people who have lived experience of poverty to raise the profile of our cause. We will use personal information that you share with us if you agree to help us promote our cause. This might include photographs and videos. For example, we may ask to use your information in case studies or stories that we will publish or share with Trussell and the media. We will seek to anonymise your information wherever possible and will only use your information for this purpose if you have given your consent for us to do so.

Carrying out surveys and research
If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We may use a university, work with Trussell or third-party research organisations to undertake analysis of survey responses. Survey results are anonymised before being shared or published. Our legal basis for using your personal information for this purpose is for our legitimate interests, or where appropriate your consent.

Health, safety and security
We will process limited personal data about attendees to our operating premises whether those attendees are employees, contractors, volunteers, or members of the public. We do this to ensure the health and safety of people inside the building as well as the security of the building and its contents. Our legal basis for this processing is our legitimate interest.

Employee and volunteer administration and development
We will process personal information of employees to fulfil our contract with them, and to meet our legal obligations as an employer. This includes payroll processing and the provision of training. We are required by law to share some financial information with the HMRC. We may also need to share some personal information with other organisations, for example solicitors, pension providers.

Where you volunteer with us, we collect personal information to support the administration of your volunteering activity. Our lawful basis for processing volunteers' personal information is our legitimate interest, to meet our legal obligations, or where appropriate, your consent.
We share personal information about our employees and volunteers with Trussell to support the work of the Foodbank Network. Trussell uses this information to communicate with our workforce and provide access to support services available. Trussell uses data about volunteers to produce statistical and aggregate information about volunteering across the Foodbank Network to help develop and improve people's experiences of volunteering, for equalities monitoring purposes, and to evidence the impact of volunteering across the Foodbank Network.

Recruitment
If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your application. We may also collect personal data about you from third parties, such as recruitment services, references supplied by former employers, information from employment background check providers and information from criminal records checks when applicable to the role.
Where applicable, we need to process your data prior to entering into a contract with you, to meet our legal obligations, or because we have a legitimate interest to use the personal information provided for our recruitment purposes. We will not use this information for any other purpose.

Undertaking safeguarding activities including DBS checks
When necessary, we process relevant personal information about employees and volunteers for safeguarding purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of. It may be necessary to share some personal information with relevant authorities such as the police. Our legal basis for this processing is to meet our legal obligations or where appropriate your consent.

Processing expenses
We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.

Governance
We process relevant personal information about existing and potential trustee members for governance purposes. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees. Our legal basis for this processing is to meet our legal obligations.

Cookies, web beacons and other storage technologies used on our website
We use cookies and other tracking technologies to store information about how you use our sites. A cookie is a piece of data stored on a user's computer to remember information about you and create a profile of your viewing preferences. Your profile is used to tailor your visit to our website, make navigation easier, and direct you to information that best corresponds to your interests. We require your consent to place

non-essential cookies on your device. You can change your cookie preferences by selecting the button in the bottom left corner from any page on our website. View our cookies policy **here**.

Sharing personal information
We will only share your personal information where we need to, where someone's life is at risk or we are required to do so by law.
We may share your personal information with Trussell which is a separate data controller. Trussell directly supports over 1400 food bank centres throughout the UK which together represent the Foodbank Network. Where we share your personal information with Trussell we will inform you as outlined in the section "Why we collect personal information" above. We have a data sharing agreement in place with Trussell which sets out what information is shared, and why we share your data. **View Trussell's privacy notice here**.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our IT hosting or support service providers. We have data processing agreements or clauses in place with any data processors that we may use, ensuring they will not use your information for their own purposes and that they protect your personal information to the same standards as set out in our policies.
We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice.
Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.
In some situations, the organisation may transfer some or all its assets as part of a merger or acquisition. If another organisation acquires the food bank, they will hold substantially all the same information and will assume the rights and obligations with respect to the personal information as described in this privacy notice.

International transfers of data
We may need to transfer some personal data to the third parties described above who are located outside of the UK. In such cases, we will take appropriate measures to ensure your personal data remains protected. If the receiving organisation is based outside of the UK and in a country that is not protected by an adequacy decision (providing an adequate level of data protection) we will take appropriate safeguards, such as implementing International Data Transfer Agreements as part of our contracts with our processors.
If you have any questions or need more information regarding international transfers of your personal data, please contact Euston Foodbank Data Protection Lead.

Your rights
If you no longer wish to receive communications about products and services from us, please contact Euston Foodbank Data Protection Lead.

You can also unsubscribe at any time to emails that we may send to you about the products and services that we think will be of interest to you. A link to unsubscribe from all direct marketing will be included in any communications.
You also have the right to:

- Ask us for copies of your personal information.
- Tell us to change or correct your personal information if it is incomplete or inaccurate.
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you.

For all requests please contact Euston Foodbank Data Protection Lead. We will respond to any request within 30 days.
Please note that we may be entitled to refuse requests where exceptions apply, for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this privacy notice.

How long we keep your personal information
We will hold your personal information only for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes. We have in place a personal data retention schedule which sets out how long we keep your personal information for. A summary of our retention periods is available below.

People who need help from the food bank	Your personal information is stored in a secure database for six years from the date you last received support.
People who donate food	Where you provide personal information alongside your food donation, your personal information is stored in a secure database for three years from the date you last donated.
People signing up to a campaign	Your personal information is stored in a secure database for up to two years from the date you last took an action.
Financial donors	Your personal information is stored in a secure database for seven years from the date you last donated.
Unsuccessful volunteer applications	If your application is unsuccessful, your application will be held for twelve months unless we're obliged to keep it longer.
Successful volunteer applications	If your application is successful, your application will be held for twelve months unless we're obliged to keep it longer.

Volunteers (inc. people engaged in our participation projects)	If you stop volunteering, your information will be held for twelve months as a baseline unless we're obliged to keep it longer. In which case, we only keep necessary information.
Survey and research participants	Twelve months after survey is completed. Then results are anonymised.
Promoting our work through sharing your story, photographic images and videos	Up to five years after consent was obtained, unless you withdraw your consent sooner.
Representatives of referral agency partners	Two years after the date of the last referral made.
Complainants	Six years if the complaint is upheld, three years if the complaint is not upheld.
Employees	Seven years after employment ceases.
Website users	**See our cookie policy**

Changes to this Privacy Notice

This Privacy Notice was last updated on 1 October 2026 and may change from time to time. We recommend that you please visit this webpage periodically to keep up to date with the changes in our Privacy Notice.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Euston Foodbank
28 Phoenix Road
London
NW1 1TA

Contact: Euston Foodbank's Data Protection Lead: Daphine Aikens
Tel: 020 4615 9770
Email: daphine@euston.foodbank.org.uk

Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for people referred to food banks

Personal information

When you come to a food bank for help, the food bank will keep some information about you. This is "personal data", because it is about you as an individual, and it can be linked to you. The food bank is responsible for looking after your personal information, known as the data controller, we're registered with the Information Commissioners Office.

If you have any questions about anything in this statement, you can contact Euston Foodbank's Data Protection Lead

What personal data do we hold?

The food bank will keep the data that is on your foodbank voucher(s) including; your name, address, and year of birth; information about your household including the number of other adults and children living with you; the reason you were referred. We will also keep a record of who gave you the foodbank voucher, where you give permission any dietary requirements, and a phone number; so we can contact you about the support we can offer.

The organisation that referred you may have also asked you about your ethnicity. We use this information to help us to better understand if we're meeting the needs of different groups in our communities. This is sensitive personal information, and we need your permission to hold it. You can choose not to provide this information and it won't affect the help you receive in any way. Once you collect your parcel this information is anonymised (so that it can't be linked to you).

What is your data used for?

We only ask for information about you that we need. The reasons we need your information include:

1. To provide you with the help and support you've requested.
2. To report on the reasons why people need our help, and the support we've provided.
3. If you've needed help from the food bank more than once, we use this information understand if you need other help, such as help maximising your income. In this situation we may be able to offer support directly, or with your permission, refer you to another organisation who can help.

Does the food bank have a right to your data?

Under UK Data Protection law, we need a "lawful basis" for using your personal information.

The food bank has a "legitimate interest" to use information you provide to offer you the help you've requested, and to evidence why people needed our help, and the support we've given.

In some situations we need your "consent" to use your information. For example, where you agree to providing a phone number so we can contact you about the support we're providing or where you provide information about your ethnicity.

Who can see your data?

Your personal information is only seen by people who need to do so for food bank reasons. It is not used for any other purpose. Your information is accessible to authorised people from this food bank. If you go to a different food bank in the Trussell Foodbank Network, then authorised people from both food banks will be able to see your information – including your visits to the other food bank(s).

Agencies who refer you to a food bank using an on-line system called "e-referral" can see information about you and your visits to the food bank. If an agency with access to e-referral performs a successful search for someone with your name and postcode, they can see the date you last accessed help, but they can't see any more detail, like your address or why you needed food bank help unless they refer you.

Your personal information is stored in a secure database run by Trussell, who are a separate data controller. Trussell is a data controller registered with the UK Information Commissioner's Office registration number Z279027X. Trussell uses your information for statistical, research and monitoring purposes to campaign for a future where no one needs to use a food bank.

Trussell uses trusted suppliers to help run and manage the system. Where Trussell works third parties, they have contracts or agreements in place to ensure your information is kept

safe. For more information about how Trussell protected your information please visit https://trussell.org.uk/privacy

How long will your data be kept?

Your personal information kept for six years after the date you last received a food parcel.

After six years, identifiable information about you, like your name and address, are removed from the database. This is known as anonymisation as the data can no longer be linked to you. We keep this information so we can effectively report on how the need for food banks has changed over time. We also need to show we have acted properly as a charity and used people's donations in the right way.

What rights do you have?

Under UK Data Protection legislation you have several rights, including to:

- Ask us for a copy of your personal information. There are some exemptions, which mean you may not always receive all the information we process.
- Tell us to change or correct your personal information if it is incomplete or inaccurate.
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a negative and disproportionate impact on you.

To exercise your rights please contact Euston Foodbank's Data Protection Lead

Euston Foodbank
28 Phoenix Road
London
NW1 1TA

Contact: Euston Foodbank's Data Protection Lead: Daphine Aikens
Tel: 020 4615 9770
Email: daphine@euston.foodbank.org.uk

Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for food donors / donor groups

Personal data

When your organisation becomes a regular food donor for the foodbank, the foodbank will keep some data about you. This includes some "personal data", which relates to particular named people.

What personal data do we hold?

The foodbank will keep data about you on an on-line data system. This will record the name of your group, and your main contact's name, phone numbers, email address and postal address. This is the only data the foodbank will usually hold about you. We do not get data about you in any other way. There may also be information about you in emails.

How is your personal data kept safe?

The data is kept in a secure on-line database. This can only be accessed with a login and password. We require all users of the system to sign a "data protection statement". This means they know they must keep your data safe, and only use it for the right purposes. All our other volunteers also have to sign a confidentiality agreement. We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a volunteer leaves the foodbank, we stop their access to the data system.

What is your data used for?

Your data will only be used to contact you about food donations. For example, this could be to advise you of shortage items, to thank you for donations, or to prompt you about delivery arrangements for harvest or Christmas donations. We may also use your data to

send you newsletters or information about the work of the foodbank. There is a separate Data Privacy Statement for "Supporters". Please ask if you would like to see a copy of that Data Privacy Statement.

Does the food bank have a right to your data?

Under Data Protection legislation, the foodbank needs to have a "lawful basis" for keeping your data, and for using it. There are several types of "lawful basis". One of them is called "performance of a contract". When you become a food donor group, we enter into a "contract" or relationship together. You undertake to make food donations to the foodbank; we undertake to give you information that will help you. To do this, we need to hold data about you. That is why the lawful basis for holding your data is "performance of a contract".

If we send you newsletters or information about the work of the foodbank, the lawful basis for this is "legitimate interest". As a supporter group, we believe that it is reasonable ("legitimate") for us to keep you informed. Newsletters or similar communications will always have an opt-out or "unsubscribe" option.

Who can see your data?

Your data on the on-line system can only be seen by authorised people who have been given a login and password for the data system. We are as careful as possible to make sure no one else has access to your data.

How long will your data be kept?

Your data will be kept for three years from the date you last donated while you are a donor group. If you tell us you have stopped being a donor, we will delete your organisation's data from the on-line system's record of active donor groups. The data system will still record donation amounts and dates, but your contact details will not be kept.

Who can you speak to if you have questions?

If you have questions about your data, and what we do with it, you should contact Euston Foodbank's, Data Protection Lead

What rights do you have?

You have a number of rights under Data Protection legislation:

1. **Right to be know what data we hold**
   You have a right to know what personal data we hold about you.
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

2. **Right to have a copy of the data we hold**
   You can ask for a copy of the data we hold about you. This is called a "subject access request". If you make a "subject access request", we will give you a copy of all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.

3. **Right to object**
   You can object if you think we are using your data in the wrong way. You can also object if you think we don't have "lawful grounds" for using your data. If this cannot be settled with the food bank you can complain to the Information Commissioner's Office.

4. **Right to have your data corrected**
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected. We may need to check what is the correct data but will put right any mistakes as soon as possible.

5. **Right to be forgotten**
   We promise to remove your data after one year of you leaving the food bank, or earlier if requested by you.

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

Euston Foodbank
28 Phoenix Road
London
NW1 1TA

Contact: Euston Foodbank's Data Protection Lead: Daphine Aikens
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Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for financial donors

Personal data

If you give money to the foodbank for help via a Standing Order or a Gift Aid agreement, the foodbank will keep some data about you. This is "personal data", because it is about you as a particular person, and it can be linked to you.

What personal data do we hold?

If you send us a Standing Order form, it will hold your name, address, email address, and bank account details. If you send us a Gift Aid form, it will record your name, address, email address, and bank account details. Both of these forms may also record that you are happy to receive communications from us. If you just send us money donations, our account records will just show your name, date and amount paid.

How is your personal data kept safe?

The originals of your forms, or a photo-copy, are kept in a secure, locked cabinet in the foodbank office The key is only available to members of staff with responsibility for fund raising. The information is also held in a spreadsheet. This file is kept on a password-protected computer.
From time to time we claim Gift Aid money back from the government. When this happens, another spreadsheet is created which lists all the people whose Gift Aid we are reclaiming. This spreadsheet is also kept on a password-protected computer.

What is your data used for?

Your Standing Order form is used to tell your bank to make payments to the foodbank, and for our treasurer to keep track of those payments. Your Gift Aid form is kept so that we can prove what Gift Aid money we can reclaim from the government.
Does the food bank have a right to your data?

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”. When you sign a Standing Order or Gift Aid form, you enter into a “contract” (or agreement) with the foodbank. You undertake to pay funds to the foodbank; we undertake to report those funds accurately in our accounts, and to reclaim any Gift Aid money from the government.
Your Standing Order or Gift Aid form may have shown that you are happy to receive information from us. The lawful basis for sending you newsletters or similar communications would then be “legitimate interest”. If you have indicated that you are happy to receive information, then it is reasonable (“legitimate”) for us to regard you as a supporter and send you information. There is a separate Data Privacy Statement for supporters. Newsletters or similar communications will always have an opt-out or “unsubscribe” option.

Who can see your data?
The only people who have access to your data are the treasurer / the foodbank chief executive and staff with responsibility for fund raising / HMRC when reclaiming Gift Aid / our auditor.
We are as careful as possible to make sure no one else has access to your data.

How long will your data be kept?
Your Standing Order or Gift Aid form will be kept for as long as it is in operation. You can cancel your Standing Order or Gift Aid agreement at any time. Your forms will then be kept for six years. This is so we could prove that our accounts are correct. Charity law means we may need to be able to prove this.

Who can you speak to if you have questions?
If you have questions about your data, and what we do with it, you should contact Euston Foodbank’s Data protection Lead.

What rights do you have?
You have a number of rights under Data Protection legislation:
Right to be know what data we hold
You have a right to know what personal data we hold about you.
This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
Right to have a copy of the data we hold
You can ask for a copy of the data we hold about you. This is called a “subject access request”. If you make a “subject access request”, we will give you a copy of all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.
Right to object
You can object if you think we are using your data in the wrong way. You can also object if you think we don’t have “lawful grounds” for using your data. If this cannot be settled with the food bank you can complain to the Information Commissioner’s Office.

Right to have your data corrected
If you think there is a mistake in your data, please tell us. You have a right to have it corrected. We may need to check what is the correct data but will put right any mistakes as soon as possible.
Right to be forgotten
We promise to remove your data after one year of you leaving the food bank, or earlier if requested by you.

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

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Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for foodbank staff

Personal data

When you become an employee at the foodbank, the foodbank will keep some data about you. This is "personal data", because it is about you as a particular person, and it can be linked to you.

What personal data do we hold?

The foodbank will keep personal data about you in several ways.

1. **your application form to work for the foodbank**
   this records your name, address, email address, phone number, if a DBS check was needed, and any unspent criminal convictions

2. **your terms and conditions of employment**
   this holds things like your name, address, email address, phone numbers, emergency contact details, remuneration rate and pension arrangement

3. **your HMRC PAYE records**
   these record your name, address, NI number, date of birth, and payments of salary, NI and tax

4. **your Pension payment records**
   if we have workplace pension arrangements in place for you, then we record your name, address, NI number, date of birth, and pension contributions

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way. There may also be information about you in emails.

In the event of a grievance, accusation or disciplinary matter, this will be recorded separately.

How is your personal data kept safe?

Where data is held about you on printed documents (such as your application form), this is kept in a secure, locked filing cabinet. The key is only available to Euston Foodbank's Data Protection Lead, the Trustee with Lead Data Protection Responsibilities and the Chair of the Trustees.

Where data is held about you in computer files (such as your terms and conditions of employment), these are kept on a password protected computer.

HMRC PAYE and workplace pension data is accessed through a password-protected dedicated on-line service.

What is your data used for?

Your data is only used for purposes directly relating to your employment, particularly:

1. To contact you about your employment, if we need to
2. To contact the right person, if you have an accident or are taken ill when at work
3. To maintain PAYE records required by HMRC, and records required by any workplace pension provider

Does the food bank have a right to your data?

Under Data Protection legislation, the foodbank needs to have a "lawful basis" for keeping your data, and for using it. There are several types of "lawful basis". One of them is called "performance of a contract".

When you become an employee of the foodbank, we enter into a "contract" together. You undertake to fulfil your role; we undertake to properly look after you, other people, and our accounts. To do this, we need to hold data about you. That is why the lawful basis for holding your data is "performance of a contract".

Who can see your data?

The only people who have access to your data are Euston Foodbank's Data Protection Lead, the trustees and the treasurer. We are as careful as possible to make sure no one else has access to your data system.

How long will your data be kept?

Your data is kept while you are an employee of the foodbank.

If you stop being an employee, non-financial data will be kept for one year. This is so that we can contact you, if we need to ask you any questions about your time as an employee. It also helps us if you ask us for a reference, because you are applying for a job or another volunteer position. After a year these records will be destroyed, unless there is a reason why we are still in touch with you about your time as an employee

Financial records – including PAYE and workplace pension – will be kept for six years after you leave. This is so we can prove that our accounts are correct, and that we have made the right payments.

We may keep records of any grievance, dispute or accusation for up to six years.

Who can you speak to if you have questions?

If you have questions about your data, and what we do with it, you should contact the Euston Foodbank Data Protection Lead or the trustee with Lead Data Proection Responsibilities or the Chair of Trustees:

What rights do you have?

You have a number of rights under Data Protection legislation:

6. **Right to be know what data we hold**
   You have a right to know what personal data we hold about you.
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

7. **Right to have a copy of the data we hold**
   You can ask for a copy of the data we hold about you. This is called a "subject access request". If you make a "subject access request", we will give you a copy of all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.

8. **Right to object**
   You can object if you think we are using your data in the wrong way. You can also object if you think we don't have "lawful grounds" for using your data. If this cannot be settled with the food bank you can complain to the Information Commissioner's Office.

9. **Right to have your data corrected**
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected. We may need to check what is the correct data but will put right any mistakes as soon as possible.

10. **Right to be forgotten**
    We promise to remove your data after one year of you leaving the food bank, or earlier if requested by you.

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

Euston Foodbank
28 Phoenix Road
London
NW1 1TA

Contact: Euston Foodbank's Data Protection Lead: Daphine Aikens
Tel: 020 4615 9770
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Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for supporters

Personal data

There are many ways in which you can be a supporter of the foodbank. Some supporters receive newsletters or similar updates about the work of the foodbank. This Data Privacy Statement is for this group. In this Data Privacy Statement, the word "supporter" means someone who receives newsletters or similar updates.

There are separate Data Privacy Statements for volunteers, food donor groups and referral agencies. If you are in one of these groups, please also ask for its Data Privacy Statement, if you would like to see it.

What personal data do we hold?

If you are a supporter, we will hold your name and postal address, and/or email address and/or social media identity.

How is your personal data kept safe?

Your details are held in a spreadsheet. This file kept on a password-protected computer. You might have made contact with us through our website, using the "stay in touch" facility, or the "contact us" page. If you have done this, your name and email address will also be stored on our website.

What is your data used for?

Your data is only used to send you newsletters, social media posts or other communication about the work of the foodbank. This may include requests for help with food donations, financial donations or volunteering help.

Does the food bank have a right to your data?
Under Data Protection legislation, the foodbank needs to have a "lawful basis" for keeping your data, and for using it. There are several types of "lawful basis". One of them is called "legitimate interest". If you are a volunteer, or a member of a regular food donor group, or a referral agency, then it is reasonable ("legitimate") for us to keep you informed about the work of the foodbank.

If you are not in one of those groups, we will not send you newsletters or other information unless you have agreed to be added to a mailing list. We will ask you clearly if you are happy to be added to a mailing list. You can say yes or no, or not reply. If you say yes, you will have given "consent" and we will record your details on the mailing list. The lawful basis for us to hold your data is then called "consent".

We will not record your details on the mailing list unless you give consent.

Who can see your data?
The only people who have access to your data are the foodbank manager / newsletter editor / social media volunteer / admin volunteer

We are as careful as possible to make sure no one else has access to your data.

How long will your data be kept?
Your details will be kept as long as you are happy to receive newsletters or information. At any time you can tell us that you are withdrawing consent. If you do that, we will take your details off the mailing list. We may keep enough of your details to make sure we don't send you any information by mistake.

Who can you speak to if you have questions?
If you have questions about your data, and what we do with it, you should contact Euston Foodbank's Data Protection Lead

What rights do you have?
You have a number of rights under Data Protection legislation:

1. **Right to be know what data we hold**
   You have a right to know what personal data we hold about you.
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. **Right to have a copy of the data we hold**
   You can ask for a copy of the data we hold about you. This is called a "subject access request". If you make a "subject access request", we will give you a copy of

all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.

3. **Right to object**
   You can object if you think we are using your data in the wrong way. You can also object if you think we don't have "lawful grounds" for using your data. If this cannot be settled with the food bank you can complain to the Information Commissioner's Office.
4. **Right to have your data corrected**
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected. We may need to check what is the correct data but will put right any mistakes as soon as possible.
5. **Right to be forgotten**
   We promise to remove your data after one year of you leaving the food bank, or earlier if requested by you.

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

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London
NW1 1TA

Contact: Euston Foodbank's Data Protection Lead: Daphine Aikens
Tel: 020 4615 9770
Email: daphine@euston.foodbank.org.uk

Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for foodbank volunteers

Personal data

When you become a volunteer at the food bank, the food bank will keep some data about you.
This is "personal data", because it is about you as a particular person, and it can be linked to you.

What personal data do we hold?

The food bank will have gathered personal information about you on:

- Your application form
- Your interview form
- Your volunteer record
- Any policy you have signed e.g. Confidentiality Agreement or Photo Permission form
- Any records relating to problem solving or accident reporting, if relevant.

The personal information may be held on paper or in an electronic format.

The information held will be:

- Your name and contact details
- Your address

Note on health issues (if relevant)

Notes on unspent charges or convictions (if relevant)

The name and contact details of your emergency contacts

Previous experience and qualifications

Date of birth / age

Driving information (if relevant)

DBS record (if relevant)

This is the only data the food bank will usually hold about you. We do not get data about you in any other way.

How is your personal data kept safe?

Your data is stored on the Assemble Volunteer Management System and Peakon, Engagement software provided by Trussell. Assemble and Peakon are specialist cloud hosted software applications, with IS0 2001 security compliance standards. The systems have been subject to appropriate due diligence and have been deemed to have appropriate technical and organisational measures in place to protect personal data from breach.

As per their Data Sharing Agreement, both Trussell and the food bank are Data Controllers, with Assemble and Peakon acting as Data Processors.

Assemble and Peakon support the effective, consistent management and administration of volunteers.

What is your data used for?

Your data is only used for purposes directly relating to your volunteering, particularly:

- To work out the best volunteer opportunities for you
- To contact you about your volunteering
- To support your day-to-day management and development
- To make sure you get the right medical care, if you are taken ill when volunteering
- To contact the right person, if you have an accident or are taken ill when volunteering

- To ensure policies and guidance are properly managed
- To support proactive volunteer recognition.

Does the food bank have a right to your data?

Under Data Protection legislation, the food bank needs to have a lawful basis for keeping your data, and for using it. The lawful basis used by the food bank is legitimate interest, which is required in order to carry out of duty of care to you as a volunteer.

Who can see your data?

The food bank: The food bank trustees / Project Manager / volunteer supervisor (choose all that apply)

Trussell has a contract in place with the developers of Peakon and Assemble to process personal data relating to volunteers. The Data Sharing Agreement between the food bank and Trussell provide you and the food bank with access to the systems. Trussell is only able to access personal data in order to provide systems support and guidance to volunteer managers and volunteers and to ensure the systems are kept up to date and properly maintained.

You: you can log into Assemble, see what personal data is held and update your personal information directly.

How long will your data be kept?

Your application form will be kept on the Assemble system. If we are unable to find a volunteer position for you, your application form will be kept for one year, unless you ask us to delete it sooner.

If you become a volunteer, then your data is kept for as long as you are a volunteer at the food bank.

If you stop being a volunteer, we will keep your data for a further year. This is so that we can contact you, if we need to ask you any questions about your time as a volunteer or if you require a reference for a new role. After a year your records will be destroyed, unless there is a reason why we still need to be in touch with you about your time as a volunteer.

Who can you speak to if you have questions?

If you have questions about your data, and what we do with it, you should contact [the food bank manager]: [name] [email address] [phone number]

What rights do you have?

You have a number of rights under Data Protection legislation:

1. **Right to be know what data we hold**
   You have a right to know what personal data we hold about you.
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

2. **Right to have a copy of the data we hold**
   You can ask for a copy of the data we hold about you. This is called a "subject access request".
   If you make a "subject access request", we will give you a copy of all the data we hold about you.
   We will do this within one month. If it helps, we will give you the data in a computer file.

3. **Right to object**
   You can object if you think we are using your data in the wrong way.
   You can also object if you think we don't have "lawful grounds" for using your data. If this cannot be settled with the food bank you can complain to the Information Commissioner's Office.

4. **Right to have your data corrected**
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.

5. **Right to be forgotten**
   We promise to remove your data after one year of you leaving the food bank, or earlier if requested by you.

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Information Commissioner's Office (ICO) registration number ZA250016

Data Privacy Statement for referral agencies

Personal data

When your organisation becomes a referral partner for the foodbank, the foodbank will keep some data about you. This includes some "personal data" which relates to particular named people.

We also keep data about clients you refer to the foodbank. There is a separate Data Privacy Statement for Clients. Please ask if you would like to see a copy of that Data Privacy Statement.

What personal data do we hold?

The foodbank will keep data about you in two ways:

1) the registration form you filled in to become a referral agency
   this records the name, address, email address, phone number, and name of principal contact at your organisation; and the name, signature and role of personnel authorised to issue foodbank vouchers
2) our on-line data system this records the name, address, email address, phone number, and name of principal contact at your organisation; and the name, job title and email address of any personnel authorised to make e-referrals to the foodbank

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way. There may also be information about you in emails.

How is your personal data kept safe?

Your registration forms are held in a locked cabinet. The key is only available to members of staff.

The digital data is kept in a secure on-line database. This can only be accessed with a login and password. We require all users of the system to sign a "data protection statement". This means they know they must keep your data safe and only use it for the right purposes. All our other volunteers also must sign a confidentiality agreement. We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a volunteer leaves the foodbank, we stop their access to the data system.

What is your data used for?
Your data is only used to

- Validate signatures on vouchers your organisation has issued
- Contact you if there is an important query about a client you have referred to the foodbank
- Send you replacement vouchers
- Keep in contact with you, for example to seek a meeting or invite your organisation to an event

Does the foodbank have a right to your data?
Under Data Protection legislation, the foodbank needs to have a "lawful basis" for keeping your data, and for using it. There are several types of "lawful basis". One of them is called "performance of a contract".

When you become a referral agency foodbank, we enter into a "contract" together. You undertake to send people in genuine crisis to the foodbank with a completed voucher; we undertake to provide them with emergency food, and contact you if there is a problem. To do this, we need to hold data about you. That is why the lawful basis for holding your data is "performance of a contract".

Who can see your data?
The only people who have access to your application forms are < ....> . Your data on the on-line system can only be seen by authorised people who have been given a login and password for the data system. We are as careful as possible to make sure no one else has access to your data.

How long will your data be kept?
Your application form will be kept while you are a referral agency for the foodbank. If you stop being a referral agency, we will destroy your application form and any other signatories' forms. We will also delete you from the online data system as an active referral agency.

The on-line data system also records data from all foodbank vouchers. These will continue to show the name of the agency and the agency worker that issued a voucher, and their contact phone number. This is also recorded on the printed vouchers. These are kept for six years in case we need to evidence proper use of public donations.

Who can you speak to if you have questions?
If you have questions about your data, and what we do with it, you should contact Euston Foodbank's Data Protection Lead.

What rights do you have?
You have a number of rights under Data Protection legislation:

1. **Right to be know what data we hold**
   You have a right to know what personal data we hold about you. This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. **Right to have a copy of the data we hold**
   You can ask for a copy of the data we hold about you. This is called a "subject access request". If you make a "subject access request", we will give you a copy of all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.
3. **Right to object**
   You can object if you think we are using your data in the wrong way. You can also object if you think we don't have "lawful grounds" for using your data. We will give you a statement explaining why we use your data and explaining the "lawful grounds". If you are still not happy, you can complain to the Information Commissioner's Office. If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. **Right to have your data corrected**
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected. We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. **Right to be forgotten**
   We promise to remove your data after six years. You have a right for this to happen, because we don't need to keep your data any longer than six years.

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

Cookie Policy

Use of cookies
Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

Necessary cookies
This is a list of cookies that are necessary for our website's functionality.

Cookie name	Provider	Description	Type	Expiry
_GRECAPTCHA rd::a rc::b rc::c	google.com	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	HTTP	179 days Persistent Session Session
CONSENT	youtube.com	Used to detect if the visitor has accepted the marketing category inb the cookie banner. This cookie is necessary for GDPR-compliance of the website.	HTTP	5977 days
CookieConsent	trussell.org.uk	Stores the user's cookie consent state for the current domain.	HTTP	1 year
test_cookie	doubleclick.net	Used to check if the user's browser supports cookies.	HTTP	1 day

Analytical cookies
Analytical cookies help us to improve our website by collecting and reporting information on its usage.

Cookie Name	Provider	Description	Type	Expiry
_ga	trussell.org.uk	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	HTTP	2 years

_gat	trussell.org.uk	Used by Google Analytics to throttle request rate.	HTTP	1 day
_gid cookie	trussell.org.uk	User identifier	HTTP	24 hours
History.store	trussell.org.uk	Contains a visitor ID – this is used to track visitors' navigation and interaction on the website for internal website optimisation.	HTML	Session
vuid	vimeo.com	Collects data on the user's visits to the website, such as which pages have been read.	HTTP	2 years
_wt.user	Webtrends Optimize	Used by WTO to support improvements to user experience and AB testing.	HTTP	90 days
_wt.control	Webtrends Optimize	Used by WTO to support improvements to user experience and AB testing.	HTTP	90 days
_wt.conversion	Webtrends Optimize	Used by WTO to support improvements to user experience and AB testing.	HTTP	Session
_wt.mode	Webtrends Optimize	Used by WTO to support improvements to user experience and AB testing.	HTTP	Session
_wt.activeSplit	Webtrends Optimize	Used by WTO to support improvements to user experience and AB testing.	HTTP	Session
_wt.project	Webtrends Optimize	Used during experiments like A/B testing, this cookie stores which version of a page or feature a user was shown to ensure they see the same version consistently.	HTTP	90 days
_hjSessionUser_{site_id}	Hotjar	Set when a user first lands on a page. Persists the Hotjar User ID which is unique to that site. Hotjar does not track users across different sites. Ensures data from subsequent visits to the same site are attributed to the same user ID.	Cookie JSON	365 days

_hjFirstSeen	Hotjar	Identifies a new user's first session. Used by Recording filters to identify new user sessions.	Cookie Boolean true/false data type	30 minutes duration, extended on user activity
_hjHasCachedUserAttributes	Hotjar	Enables Hotjar to know whether the data set in _hjUserAttributes Local Storage item is up to date or not.	Cookie Boolean true/false data type	Session duration
_hjUserAttributesHash	Hotjar	Enables Hotjar to know when any User Attribute has changed and needs to be updated.	Cookie Content hash data type	2 minutes duration, extended every 30 seconds
_hjUserAttributes	Hotjar	Stores User Attributes sent through the Hotjar Identify API	Local storage item Base64 encoded JSON data type	No explicit expiration
hjViewportId	Hotjar	Stores user viewport details such as size and dimensions	Session storage item UUID data type	Session duration
HjActiveViewportIds	Hotjar	Stores user active viewports IDs. Stores an expirationTimestamp that is used to validate active viewports on script initialization.	Local storage item JSON data type	

_hjSession_{site_id}	Hotjar	Holds current session data. Ensures subsequent requests in the session window are attributed to the same session.	JSON data type	30 minutes duration, extended on user activity
_hjSessionTooLarge	Hotjar	Causes Hotjar to stop collecting data if a session becomes too large. Determined automatically by a signal from the server if the session size exceeds the limit.	Boolean true/false data type	1h duration
_hjSessionResumed	Hotjar	Set when a session/recording is reconnected to Hotjar servers after a break in connection	Boolean true/false data type	Session duration
_hjCookieTest	Hotjar	Checks to see if the Hotjar Tracking Code can use cookies. If it can, a value of 1 is set. Deleted almost immediately after it is created	Boolean true/false data type	Under 100ms duration, cookie expiration time set to session duration
_hjLocalStorageTest	Hotjar	Checks if the Hotjar Tracking Code can use Local Storage. If it can, a value of 1 is set. Data stored in _hjLocalStorageTest has no expiration time, but it is deleted almost immediately after it is created.	Boolean true/false data type	Under 100ms duration
_hjSessionStorageTest	Hotjar	Checks if the Hotjar Tracking Code can use Session Storage. If it can, a value of 1 is set. Data stored in _hjSessionStorageTest has no expiration time, but it is	Boolean true/false data type	Under 100ms duration

		deleted almost immediately after it is created.		
_hjIncludedInPageviewSample	Hotjar	Set to determine if a user is included in the data sampling defined by your site's pageview limit. 2 minutes duration, extended every 30 seconds.	Boolean true/false data type	2 minutes duration, extended every 30 seconds
_hjIncludedInSessionSample_{site_id}	Hotjar	Set to determine if a user is included in the data sampling defined by your site's daily session limit.	Boolean true/false data type	2 minutes duration, extended every 30 seconds
_hjAbsoluteSessionInProgress	Hotjar	Used to detect the first pageview session of a user	Boolean true/false data type	30 minutes duration, extended on user activity
_hjTLDTest	Hotjar	We try to store the _hjTLDTest cookie for different URL substring alternatives until it fails. Enables us to try to determine the most generic cookie path to use, instead of page hostname. It means that cookies can be shared across subdomains (where	Boolean true/false data type	Session duration

		applicable). After this check, the cookie is removed.		
_hjRecordingEnabled	Hotjar	Set when a Recording starts. Read when the Recording module is initialized to see if the user is already in a recording in a particular session.	Session storage item Boolean true/false data type	Session duration
_hjClosedSurveyInvites	Hotjar	Set when a user interacts with a Link Survey invitation modal. Ensures the same invite does not reappear if it has already been shown.	Cookie List of Survey IDs, URL encoded	365 days duration
_hjDonePolls	Hotjar	Set when a user completes an on-site Survey. Ensures the same Survey does not reappear if it has already been filled in.	Cookie List of Survey IDs, URL encoded	365 days duration
_hjMinimizedPolls	Hotjar	Set when a user minimizes an on-site Survey. Ensures that the Survey stays minimized when the user navigates through your site.	Cookie List of Survey IDs, URL encoded	365 days duration
_hjShownFeedbackMessage	Hotjar	Set when a user minimizes or completes a Feedback widget. Ensures the Feedback widget will load as minimized if the user navigates to another page where it is set to show.	Cookie Boolean true/false data type	One day duration
_pk_uid	TVSquared (InnovidXP)	Allows the InnovidXP tracker to identify individual users, establish lag between response activities, and confirm the continuity of campaigns being responded to.	Third Party Persistent	2 years
_pk_id or _tq_id	TVSquared (InnovidXP)	Aids reporting of site visits and actions for analytical reporting to Innovid.	First Party Persistent	2 years
_pk_ses	TVSquared (InnovidXP)	Confirms an individual user in relation to an individual	First Party Session	30 minutes

		session, i.e., how long the user is on the website.		

Marketing cookies

Marketing cookies help us to measure the success of our advertisements and target them at people who may be interested in supporting our work.

Cookie Name	Provider	Description	Type	Expiry
_fbp	trussell.org.uk	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	HTTP	3 months
_gcl_au	trussell.org.uk	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	HTTP	3 months
ads/ga-audiences	google.com	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitors online behaviour across websites.	Pixel	Session
fr tr	facebook.com	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	HTTP Pixel	3 months Session
IDE	doubleclick.net	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	HTTP	1 year
VISITOR_INFO1_LIVE	youtube.com	Tries to estimate the user's bandwidth on pages with integrated YouTube videos.	HTTP	179 days
WIDGET::local::assignments	soundcloud.com	Used by audio-platform SoundCloud to implement, measure and improve their embedded content/service on the website – the collection of	HTML	Persistent

		data also includes visitors' interaction with embedded content/service. This can be used for statistics or marketing purposes.		
YSC yt.innertube::nextId yt.innertube::requests	youtube.com	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	HTTP HTML HTML	Session Persistent Persistent
yt-remote-cast-available yt-remote-cast-installed yt-remote-connected-devices yt-remote-device-id yt-remote-fast-check-period yt-remote-session-app yt-remote-session-name	youtube.com	Stores the user's video player preferences using embedded YouTube video.	HTML	Session Session Persistent Persistent Persistent Session Session Session
_ttp	tiktok.com	Tracks user behaviour and measures ad performance across sites.	HTTP	13 months
tt_pixel_session_index	tiktok.com	Identifies a session for pixel tracking and event grouping.	HTTP	Session