

# GDPR Policy

Last Updated: 11/04/24

### Policy Scope

This general data protection regulation (GDPR) policy describes FEAST With Us' (hereby known as FEAST) responsibility and procedures on the collection, use, and disclosure of information when our service is used and informs individuals about their privacy rights and how the law protects them.

FEAST use personal data to provide and improve our service. By providing personal data to FEAST, you agree to the collection and use of information in accordance with this policy.

### Definitions

For the purposes of this policy:

Account: a unique account created for you to access our service or parts of our service.

**FEAST:** (referred to as either "FEAST", "we", "us" or "our" in this agreement) refers to FEAST With Us, 2A, The Quadrant, Epsom, KT17 4RH.

**Cookies:** small files that are placed on your computer, mobile device, or any other device by a website, containing the details of your browsing history on that website among its many uses.

Country: refers to England and Wales.

Device: any device that can access the service such as a computer, a mobile phone, or a digital tablet.

Personal Data: any information that relates to an identified or identifiable individual.

**Service:** the FEAST website or any system used to store your information e.g. MS OneDrive, Beacon CRM, Airtable.

**Service Provider:** any natural or legal person who processes the data on behalf of FEAST. It refers to third-party companies or individuals employed by FEAST to facilitate the service, to provide the service on behalf of FEAST, to perform services related to the service or to assist FEAST in analysing how the service is used.

**Usage Data:** data collected automatically, either generated using the service or from the service infrastructure itself (for example, the duration of a page visit).

Website: Feast With Us' website, accessible from www.feastwithus.org.uk

**You:** the individual accessing or using the service, or FEAST, or other legal entity on behalf of which such individual is accessing or using the service, as applicable.

# Types of Data Collected

### **Personal Data**

While using FEAST's service, FEAST may ask for certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address.
- First name and last name.
- Phone number.
- Address, Postcode, City, County.
- Passport Information/Driving License Information.
- Required medical information (to ensure safety while working on site).
- Usage Data.

### **Usage Data**

Usage Data is collected automatically when using the website.

Usage Data may include information such as an Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service that are visited, the time and date of the visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When accessing the service through a mobile device, FEAST may collect certain information automatically, including, but not limited to, the type of mobile device used, mobile device unique ID, the IP address of the mobile device, mobile operating system, the type of mobile internet browser used, unique device identifiers and other diagnostic data.

FEAST may also collect information that a browser sends whenever our service is visited, either through computer or mobile device.

### **Tracking Technologies & Cookies**

FEAST use cookies and similar tracking technologies to track the activity on our website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse services. The technologies used may include:

- Cookies or Browser Cookies. A cookie is a small file placed on a device. Cookies can be refused when loading a webpage. The browser used will indicate how to do this. However, if cookies are not accepted, some parts of our service may not work as intended. Unless a browser is adjusted in settings to refuse cookies, our service may use cookies.
- Web Beacons. Certain sections of our service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit FEAST, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "persistent" or "session" cookies. Persistent cookies remain on personal computers or mobile devices when they are offline, while session cookies are deleted as soon the web browser is closed.

We use both session and persistent cookies for the purposes set out below:

#### **Necessary / Essential Cookies**

Type: Session cookies

Administered by: FEAST

Purpose: These cookies are essential to provide with services available through the website and to enable the use of some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services required cannot be provided, and FEAST only use these cookies to provide those services.

### **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent cookies

Administered by: FEAST

Purpose: These cookies identify if users have accepted the use of cookies on the website.

### **Functionality Cookies**

Type: Persistent cookies

### Administered by: FEAST

Purpose: These cookies allow us to remember choices made when using the website, such as remembering login details or language preferences. The purpose of these cookies is to provide a more personal experience and to avoid having to re-enter preferences every time the website is used.

# Use of Personal Data

FEAST may use personal data for the following purposes:

- To provide and maintain our service, including to monitor the usage of our service.
- To manage registration as a user of the service. The personal data provided can give access to different functionalities of the service that are available to as a registered user.
- For the development, compliance, and undertaking of the purchase contract for the products, items or services purchased or of any other contract with FEAST through the service.
- To contact individuals by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including security updates, when necessary or reasonable for their implementation.
- To provide news, special offers, and general information about other goods, services, and events which we offer that are similar to those that you have already accessed or enquired about unless these updates have been opted out of.
- To manage requests made to FEAST.
- FEAST may use information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve services, products, marketing, and user experience.

We may share personal information in the following situations:

- With service providers to monitor and analyse the use of the service, and to contact individuals.
- FEAST may share information with affiliates, in which case we will require those affiliates to honour this GDPR Policy. Affiliates include service provider partners or other companies/organisations we employ to provide services.
- With consent, FEAST may disclose personal information for any other purpose with explicit consent.

• For safeguarding reasons, FEAST may share personal information as part of our safeguarding responsibilities to all stakeholders. This is detailed further in FEAST's safeguarding policy.

### Retention of Personal Data

FEAST will retain personal data only for as long as is necessary for the purposes set out in this GDPR policy. We will retain and use Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

FEAST will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of services, or where FEAST is legally obligated to retain this data for longer time periods.

# Transfer of Personal Data

FEAST will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this GDPR Policy and no transfer of personal data will take place to an organisation or a country unless there are adequate controls in place including the security of such data and other personal information.

### **Business Transactions**

If FEAST is involved in a merger, acquisition or asset sale, personal data may be transferred. We will provide notice before personal data is transferred and becomes subject to a different GDPR policy.

### Law Enforcement

Under certain circumstances, FEAST may be required to disclose personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Other Legal Requirements**

FEAST may disclose personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of FEAST.
- Prevent or investigate possible wrongdoing in connection with services.
- Protect the personal safety of service users or the public.
- Protect against legal liability.

# Security of Personal Data

The security of personal data is important to FEAST but remember that no method of transmission over the internet, or method of electronic storage is 100% secure. While FEAST strive to use commercially acceptable means to protect personal data, FEAST cannot guarantee its absolute security.

### Access of Personal Data

Information may be updated, corrected, or deleted at any time by emailing: info@feastwithus.org.uk

In particular, the following may be requested of FEAST:

- Request access to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold. This enables a correction for any incomplete or incorrect information that we hold.
- Request erasure of personal information. This enables us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of personal information where FEAST is relying on a legitimate interest (or those of a third-party) and there is something about the circumstances which makes you object to processing on this ground. You also have the right to object where we are processing personal information for direct marketing purposes that are unwanted.
- Request the restriction of processing of personal information. This enables us to suspend the processing of personal information for example if the accuracy of reasoning for processing needs to be established.
- Request the transfer of your personal information to another party.

Upon request, FEAST will provide information about whether we hold, or process (including on behalf of a third-party), any personal information that FEAST is aware of. To request this information, contact us at <u>info@feastwithus.org.uk</u>. FEAST will endeavour to respond to your access request within 30 days.

You will not have to pay a fee to access personal information (or to exercise any of the other rights). However, FEAST may charge a reasonable fee if your request for access is clearly excessive, repetitive, you have requested for multiple copies, or your request is unfounded. Alternatively, FEAST may refuse to comply with the request if the circumstances appear unusual or strange; in any situation where FEAST refuse to comply with a request, FEAST will write to you and inform you of the reasons.

### What we may need from you

FEAST may need to request specific information to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please send us email at <u>info@feastwithus.org.uk</u>. Once FEAST have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Promotional & Newsletter Communications**

You may opt out of receiving promotional and newsletter emails from FEAST by following the optout instructions provided in those emails. You may also opt-out of receiving promotional emails and other promotional communications from us at any time by emailing <u>info@feastwithus.org.uk</u> with your specific request. If you opt out, FEAST may still send you non-promotional communications, such as security alerts and notices related to your access to or use of the FEAST services or on our ongoing business relations.

# Child Data & Privacy

FEAST's service does not address anyone under the age of 13. FEAST does not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and are aware that your child has provided FEAST with personal data, please contact us. If FEAST become aware that we have collected personal data from anyone under the age of 13 without verification of parental consent, FEAST will take steps to remove that information from our servers.

If FEAST need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, FEAST may require your parent's consent before we collect and use that information.

### Links To Other Websites

FEAST's service may contain links to other websites that are not operated by FEAST. If you click on a third-party link, you will be directed to that third party's site. FEAST strongly advise you to review the GDPR and privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

#### **Contacting Us**

If you have any questions about this policy or our use of cookies, please contact us at info@feastwithus.org.uk.

Reviewed and approved on 8 March 2024 by Caroline Monkhouse Flower, CEO, and Helen Burgess, Chair of the Board of Trustees, on behalf of the board.

Signed by:

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Helen Burgess Chair of the Board of Trustees

FEAST With Us, Registered Charity in England and Wales Charity Number: 1172884 Address: 2A, The Quadrant, Epsom, KT17 4RH