



SCHOOL FOOD MATTERS

Data Protection and Privacy Policy

1. Introduction

www.schoolfoodmatters.org (“our site”) is a site operated by School Food Matters (“we” or “us” or “data controller”). This policy explains how we collect, use or process personal information through and in connection with our site. This policy may be updated from time to time, so please check back periodically. School Food Matters is committed to protecting and respecting your privacy. By using our website, you are agreeing to be bound by the terms of this policy.

2. Information about us

School Food Matters is incorporated and registered in England and Wales with company number 06657048 and has its registered office and operating address at The Bridge, 7b Parkshot, London, TW9 2RD, United Kingdom. We are also registered as a charity with the Charity Commission of the United Kingdom with charity number 1134094.

Our website is designed to provide information on our campaigns, projects and services, the opportunity to obtain membership of School Food Matters, and to make donations to School Food Matters. Our campaign mission is to ensure that every child enjoys fresh sustainable food at school and understands where their food comes from.

Our site is freely accessible to all users on the world wide web, and any person accessing our site is referred to in this policy as a “User”. Certain services available or accessible through our site, in particular in relation to the newsletter and membership of School Food Matters, require an account to be set up and personal information to be provided by account holders (“Subscribers”). This Policy explains the following regarding the use of our site:

- What information will be collected
- How the law applies to School Food Matters’ use of personal information
- For what purposes is information collected and kept about Subscribers
- Is data transferred to countries outside the EU?
- Who is collecting Subscribers’ information and with whom is it being shared?
- What security precautions are in place to protect against the loss, misuse or alteration of Subscribers’ personal information
- Use of ‘cookies’
- Changes to the policy
- Your rights under data protection legislation
- Contacting us about privacy questions or concerns

3. What information will be collected

We do not collect personally identifiable information from users. We may collect certain non-personally identifiable information from users for the purposes of improving the functionality and effectiveness of our site.

For administrative and billing purposes, it is necessary to collect certain personal information about Subscribers. We will only collect some personal details from Subscribers (such as name, organisation name, address, IP address, email address, location, job description and payment information) for the purpose of sending the termly newsletter or administering their membership (the “Subscriber Services”).

If you make a donation online, your card information is not held by us, it is collected by our third party payment processors, Paypal, who specialise in the secure online capture and processing of credit/debit card transactions. We will only collect personal details from donors (such as name, address, IP address, email address, payment information and Gift Aid status) for the purpose of sending the termly newsletter or administering their donation.

We obtain parental permission for all children (under 16 years of age) participating in our projects to be photographed and filmed. Any photographs or footage may be used to promote the work of School Food Matters and its project partners on a range of materials. This includes (but is not limited to) advertisements and other publicity materials (such as leaflets, brochures and posters), direct mail, newspapers both print and online, magazine articles, newsletters and publications for the internet, including (but not limited to) YouTube, Facebook and Twitter.

We do not knowingly collect personal data from children under the age of 16. If you are under the age of 16, please do not submit any personal data through our website. We encourage parents and legal guardians to monitor their children’s internet usage and to help enforce our privacy policy by instructing their children never to provide personal data without their permission. If you have reason to believe that a child under the age of 16 has provided personal data to us, please email us at sarah@schoolfoodmatters.org, and we will endeavor to delete that information from our databases.

4. How the law applies to School Food Matters’ use of personal information

We will process your personal information if we have:

- asked you and have a record of your express and recent consent for us to do so;
- a ‘Legitimate Interest’ to do so in order to support our charitable purposes. Our use will be fair and balanced and never unduly have an impact on your rights;
- a contract with you that we can only fulfil by using your personal information; or
- a legal obligation to use or disclose information about you, e.g. we are required by law to keep records of gifts that are given to us with Gift Aid for four years.

5. What is Legitimate Interest?

This legal ground for processing personal information means that organisations can process your personal information if they have a genuine and legitimate reason for doing so and if that use does not harm any of your rights and interests as an individual.

6. School Food Matters' Legitimate Interest

We do not unduly prioritise our legitimate business interests as a charity over your interests as an individual. We always respect your rights, which is why we carry out a balancing exercise of the rights of the charity with the rights of our supporters.

We believe that School Food Matters' supporters are engaged with our mission and want to know how they can continue to help us to achieve our charitable aims. Unless you tell us not to, we will process (keep and use) your personal information for as long as you remain a supporter of School Food Matters.

It is always your choice. We will only process your data if it does not harm your rights and interests as an individual, or if you tell us that you'd like us to stop. You can do this at any time by phoning 020 8878 8333, emailing sarah@schoolfoodmatters.org or by clicking unsubscribe on one of our newsletters.

7. For what purposes is information collected and kept about Subscribers?

Personal Information:

When information is held in a form that is capable of being linked to a particular individual or organisation, it is referred to in this policy as "personal information" and treated accordingly. We collect some basic personal information from all Subscribers for the purpose of managing, administering and affecting the Subscriber Services. We will only use that personal information for those administrative purposes and will not share it with any other persons without your explicit consent.

Updates/Marketing:

We may use your personal information to send you updates or marketing information in relation to School Food Matters and/or our campaigns, projects and/or services. We will not send you such information by email unless it is related to School Food Matters and/or our campaigns, projects and/or services, or to similar goods or services that we would like to offer you or if you give us your consent. You may inform us, through the email address provided in this policy, or through any other communication method indicated in the update or marketing material itself, that you would like us to stop sending all such communications. An unsubscribe link appears on all mailings from our database.

Non-personally identifiable data:

We may store or monitor information relating to Users and Subscribers in a form that is not personally identifiable. This will allow us to assess and improve the functionality and effectiveness of our site.

Job Applications:

We may use your information to process a job that you apply for with School Food Matters. If you are the successful candidate we will hold your information for five years from when you cease to be an employee. If you were unsuccessful following the application we will keep your records for one year unless we discuss keeping your details on file in case another opportunity arises.

8. Is data transferred to countries outside the EU?

We ensure that any third parties with access to your data are held to strict standards for data use. We use Mailchimp to send out newsletters. Mailchimp adheres to the EU-U.S. Privacy Shield Framework.

9. Who is collecting Subscribers' information and with whom is it being shared?

Other than as explicitly referred to in this policy, we will not sell, rent, share or swap your information with third parties. Personal information about subscribers is collected by us. We reserve the right to use the data stored on our site, provided it is in a non-personally identifiable form, to perform analytical studies on the use of our site, to carry out statistical studies generally and otherwise to study the data for any purpose and we may provide such data to third parties at our own discretion (including for payment).

We may disclose personal information to third parties if we believe that such disclosure is reasonably necessary to enforce or apply the terms of use of our site or to protect the rights, property and safety of us, our site, other Users or others generally, or otherwise as provided by law or required by any court of competent jurisdiction or any regulatory authority acting under statutory powers.

We will fully co-operate with law enforcement agencies to identify anyone who uses our site for illegal activities. We reserve the right to report to law enforcement agencies any activities that we believe to be unlawful.

We may share Subscribers' personal information with third parties who provide services to us such as administration services, technical services relating to the maintenance, servicing, and upgrading of our site, hosting services, data migration services and analytical services. If such third parties receive a Subscriber's personal information we will ensure that the information is only used for the purposes of providing the relevant service to us, that it is not kept or used for any other purposes, and that it is kept in a secure and confidential manner.

10. What security precautions are in place to protect against the loss, misuse, or alteration of Subscribers' personal information

A Subscriber's personal information, created on our site and saved on our system, is only accessible to us, our staff and our service providers.

Subscribers' personal information is kept on password protected, limited access servers. Wherever possible and applicable, our servers reside behind a corporate firewall that maintains controls on access to the system from both our internal network and the world wide web. Access to Subscribers' personal information is allowed only to staff that require such access and we require our staff to keep that information confidential and secure. In addition, we have created additional security protections on our site by ensuring that passwords are encrypted as SHA512 salted hashes.

Despite all our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot fully guarantee the security of any information that you disclose to us online and you must understand that you do so at your own risk. We cannot be responsible for the deliberate theft, destruction or inadvertent disclosure of your personal information whether we hold it online or offline.

11. Use of Cookies

A cookie is a small data text file, which a website stores on the user's computer hard drive (if the user's internet browser permits) that can later be retrieved to identify the user to the website operator. Cookies enable the service provider to identify, authenticate and maintain information about the way visitors use

websites. We recommend you visit <http://www.aboutcookies.org> for detailed guidance on how to control or delete them.

By accessing our site you are consenting to the way information is collected and used, as described within this policy. In return, School Food Matters gives the commitment that we will use the personal data you provide only in ways that are compatible with the policy.

The collection of information:

Every time you log on to our site your IP (Internet Protocol) address registers on our servers. Your IP address reveals no information other than the number assigned to you. We do not use this technology to get any personal data against your knowledge or free will (i.e., automatically recording e-mail addresses of visitors). Nor do we use it for any purpose other than to help us monitor traffic on our website, or (in case of criminal activity or misuse of our information) to cooperate with law enforcement.

Cookies:

The list below describes the cookies we use on our site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use our site, or you should delete the cookies having visited the site, or you should browse our site using your internet browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

First Party Cookies:

These are cookies that are set by our site directly. We use Google Analytics to collect information about visitor behaviour on our site. Google Analytics stores information about what pages you visit, how long you are on our site, how you got here and what you click on. This analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are. Find out more about [Google's position on privacy](#) as regards its analytics service.

Third Party Cookies:

These are cookies set on your machine by external websites whose services are used on our site. Cookies of this type are the sharing buttons across our site that allows visitors to share content onto social networks. Cookies are currently set by LinkedIn, Twitter, Facebook, Google+ and Pinterest. In order to implement these buttons and connect them to the relevant social networks and external sites, there are scripts from domains outside of our site. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on our site.

You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

Emails:

Some emails that we send to you include no tracking at all e.g. service emails with invoices attached. Other emails we send we can track, at an individual level, to find out whether the user has opened and clicked on a link within the email. We do not use this information at a personal level, rather we use it to understand open and click rates in order to try and improve the way we communicate. If you want to be sure that none of your

email activity is tracked then you should opt out of our emails which you can do via the unsubscribe link at the bottom of every newsletter we send.

By accessing our site, and in accordance with our [Terms of Use](#), each User and Subscriber consents to our use of cookies in accordance with this policy.

12. Changes to the policy

This policy was last updated in April 2020. If we make any changes to our privacy policy, the new version will be posted on our site. We may change, modify, add, or remove portions of our privacy policy at any time, and any changes will become effective immediately upon being posted on our site unless we state otherwise.

13. Your rights under data protection legislation

You have various rights under data protection legislation:

- Your right to access information held about you. Your right of access can be exercised in accordance with General Data Protection Regulation (GDPR). Please contact sarah@schoolfoodmatters.org to receive a subject access request form
 - Your right to correct any errors in the information we hold about you, and to change and correct any details you have already given us. Please inform us by contacting sarah@schoolfoodmatters.org about any changes to your details so that we can keep our records accurate and up to date
 - Your right to erasure. You may request that we do not process your personal data for marketing purposes. You can exercise the right at any time by contacting us at sarah@schoolfoodmatters.org or by clicking the unsubscribe link on any of our newsletters
-

14. Contacting us about privacy questions or concerns

If you have any questions, concerns or complaints about this policy, the manner in which we handle your personal information, or your dealings with us or our site, please contact us by email at sarah@schoolfoodmatters.org or write to us at School Food Matters, The Bridge, 7b Parkshot, London TW9 2RD, United Kingdom.

Thank you for visiting our site.

Data Protection and Privacy Policy for School Food Matters: Updated April 2020