



## 1 Introduction

NOAH Enterprise is a charity that helps homeless and disadvantaged people to improve their lives by providing emotional and physical care, training in employable skills and work experience opportunities in our charitable businesses. We are driven by our values of Care, Compassion and Commitment, which have their roots in Saint Vincent de Paul, whose life was the inspiration behind the founding of NOAH.

To enable us to carry out our mission we obtain and use personal data about our clients who receive practical support and guidance from us. Also we will obtain and use personal data from those who support us through donations, visiting our website or volunteering for us.

We are committed to safeguarding the privacy of our clients, supporters, retail customers and website visitors; this policy sets out what data we will collect and how we will treat your personal information in each of those cases. We will also describe your rights as regards this information.

NOAH Enterprise has prepared this policy to comply with General Data Protection Regulation [GDPR]. Should you have any questions or concerns after reading this statement please contact us at [info@noahenterprise.org](mailto:info@noahenterprise.org)

NOAH Enterprise will review this statement at least annually.

## 2 Why do we collect your data?

### Clients

We collect personal data from you so that we can provide you with advice, support or services that you have requested or been referred to. This includes interactions with our welfare services staff and training academy staff.

### Supporters

We collect personal data from you so that we can

- contact you regarding NOAH Enterprise's work, fundraising, events and activities
- record and contact you regarding donations you make to NOAH Enterprise and to process those donations and administer Gift Aid information for any donation you make to NOAH Enterprise
- contact you for feedback on aspects of NOAH Enterprise's operations and to conduct internal surveys
- contact you as and when required by statutory organisations

### Retail customers

We collect personal data from you so that we can

- process a purchase by you from one of our charity shops
- contact you for feedback on aspects of NOAH Enterprise's retail operations and to conduct internal surveys

### **Website visitors**

We collect personal data from you so that we can:

- collect information about your visits to and use of our website
- process information that you provide to us for the purpose of subscribing to our email newsletter
- process information that you supply to us when completing online forms and all other communications with us via our website.

## **3 What information do we collect?**

### **Clients**

When you come to NOAH Enterprise seeking help or advice, our trained staff will work with you to complete our 'In-Form' client registration or Working Solutions Participant Information Pack. 'In-Form' is a secure industry-standard client relationship and service management system for homelessness organisations. Any paper-based records are kept securely locked.

We will collect the following information

- your full name, date of birth and contact details
- any details of your case and circumstances so that we can provide you with advice or services
- any communication with us either verbally or written

We may collect this information from you either verbally [face-to-face or via telephone] or through any paper or digital documents we require you to complete.

Due to the nature of the services we offer, it may be necessary for us to collect sensitive, personal data about you. This may include information about health, gender, substance misuse, nationality, ethnicity and criminal records. We will normally only record such data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law.

### **Supporters**

We will collect the following information

- your full name and contact details
- your record of donations and, if appropriate, your Gift Aid details
- any other information added by you via the NOAH Enterprise website

### **Retail customers**

We will collect only such information so as to enable your purchase to be processed and delivered. We do not collect and store any credit/debit card details.

### **Website visitors**

Cookies are small text files that your browser saves to your computer and which help it to remember who you are, for example when saving your user preferences between visits.

NOAH Enterprise uses a small number of cookies on its websites to facilitate certain features and to help us provide a better service. For example this includes compiling visitor statistics so that we know which pages are popular and which ones need more attention.

Some of our third-party features, such as embedded YouTube videos and the Twitter and Facebook buttons in our news articles set third-party cookies. You can disable cookies through your browser settings, or with a browser add-on.

If you follow links to other sites from NOAH Enterprise's website, your data will be subject to the privacy policies on those sites. You should check out the privacy policy of these sites before providing your data.

## **4 What do we do with your data and who has access to it?**

### **Clients**

Because you are receiving services from us, we need to keep your personal data on file. Such a file is confidential and only accessible to trained NOAH Enterprise welfare services staff. Your data is either kept on our 'In-Form' client management database or held securely in a locked file.

As NOAH Enterprise is committed to continual improvement our data files may be audited by internal and external auditors. NOAH Enterprise will anonymise personal files prior to audit. All internal auditors will be ISO9001 trained and all external auditors will need to read and agree NOAH Enterprise's confidentiality policy before access to any file.

NOAH Enterprise routinely produces reports and evidence to statutory agencies, fundraising bodies and media organisations. In every case data will be anonymised and under no circumstances will any data sent to a third party be traceable back to an individual.

If NOAH Enterprise wishes to use your case study for publicity or fundraising purposes it will only do so with your express written consent.

NOAH Enterprise will not share or sell your personal data to any third-party organisation unless we are required to do so by law.

### **Supporters and customers**

We will store your donation record and Gift Aid details for any such period as we are required to do so by HM Revenue and Customs.

We will store your personal details for the purpose of contacting you for marketing, research and updates about NOAH Enterprise if you have given us consent.

Records of purchases will remain indefinitely on our stock control and point-of-sale databases, but such data will only be used to contact you with regard to your specific purchase. We will not use your data to contact you with regard to any other matter unless you have given us consent.

NOAH Enterprise will not share or sell your personal data to any third-party organisation unless we are required to do so by law.

Your personal data is accessible only by our Finance Office and Marketing Department.

## **5 How do we ensure your personal data is secure?**

Our welfare services system database is hosted by Salesforce.com which meets the highest international standards for data security. You can visit the Salesforce website for more information:

<https://trust.salesforce.com/en/security/>

Within NOAH Enterprise, we make every effort to protect your personal data and to maintain the integrity of your personal data. NOAH Enterprise confirms that:

- all our electronic devices that contain personal data are password-protected
- firewalls are set up



- anti-virus software is installed
- business premises are secure
- paper records are kept in securely locked storage

## 6 How long will we store your data for?

We will store your data for up to seven years after your last interaction with us, unless legislative requirements dictate that we must store your data for a different period. If you request that we delete your personal data under the right to be 'forgotten', we will do so unless we have to keep certain data for legal compliance and reporting.

## 7 What are your rights with regard to your personal data?

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances
- Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

You should make your request via [info@noahenterprise.org](mailto:info@noahenterprise.org) or 01582 728416. This does not apply to communications that we are legally bound to send you e.g. Gift Aid claim documentation.



### **8 How do you complain about NOAH Enterprise's handling of your data?**

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@noahenterprise.org](mailto:info@noahenterprise.org)

In the unlikely event that you remain unsatisfied you may contact the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>