



F4H
c/o RHQ RTR
Stanley Barracks,
Bovington, BH20 6JB

www.f4h.org.uk

1 Oct 2018

F4H General Data Protection Regulation (GDPR) – Privacy Notice

References:

- A. European General Data Protection Regulation (GDPR), 25 May 2018.
- B. Information Commissioner’s Office (ICO) GDPR: <https://ico.org.uk/for-organisations/charity/>
- C. ICO Guide to GDPR: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>
- D. Reporting a Breach: <https://ico.org.uk/for-organisations/report-a-breach/>

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Privacy Notice – GDPR: How your personal information is used by Remount t/a Future for Heroes Ltd (known as F4H).

This Privacy Notice is published to our website. More information on the charity can be found at www.f4h.org.uk.

How we use your personal information.

This privacy notice is to let you know how we look after your personal information. This includes what you tell us about yourself. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private.
- Never to sell your data.

Who we are.

We are a small charity with no full-time workers. A small cadre of individuals staff the following posts: CEO, Accountant/Governance, Outreach and Administration. We also have a Principle Trainer, Lead Mentor and a number of Ambassadors. We have a larger pool of volunteers that between them provide the course delivery through training and mentor roles.

We pay The Brathay Trust to undertake our course utilising their facilities (classrooms, food, accommodation and specialist equipment) as well as specialist training deliverers. We have worked alongside the Trust since our conception in 2008 and our relationship stretches to far, far more than just ‘...utilising their facilities...’. (<https://www.brathay.com/development-programmes/personal-change>).

The Trust also advises our support to leavers and veterans through their own work that since 1946 has been supporting disadvantaged youngsters and vulnerable adults. Without the Trust we would find it difficult to operate. Overseeing all is our Board of Trustees (<https://www.f4h.org.uk/about-us/trustees>), the Brathay Trust’s CE being one of them. Details of the CEO are also found at the link.

Our Objects as lodged with the Charity Commission are to:

Develop the ability of serving and retired members of the Armed Forces and their spouses/partners of all ranks and status to manage the dramatic change in cultures when resuming civilian life in such a way that they are better able to identify, and help meet, their needs and to participate fully in society.

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for¹	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> ▶ To manage our relationship with you. ▶ To develop new ways to meet delegates' needs and to grow our charity. ▶ To study how our delegates use services from us. ▶ To provide advice or guidance to our delegates. 	<ul style="list-style-type: none"> ▶ Your consent². ▶ Our legitimate interests. ▶ Our legal duty (if ever required). 	<ul style="list-style-type: none"> ▶ Keeping our records up to date. ▶ Developing services, and what we charge for them (our course remains free to delegates). ▶ Seeking your consent when we need it to contact you. ▶ Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none"> ▶ To develop and manage our charity and services. ▶ To manage how we work with The Brathay Trust that provide services to us. ▶ To manage how we work with The Brathay Trust's Research Hub, to better understand the outcomes and outputs of what we deliver. 	<ul style="list-style-type: none"> ▶ Fulfilling contracts. ▶ Our legitimate interests. ▶ Our legal duty (if ever required by the law). 	<ul style="list-style-type: none"> ▶ Developing services, and what we charge for them (our course remains free to our delegates). ▶ Defining types of delegates for new services. ▶ Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> ▶ To deliver our services. ▶ To make and manage payments. ▶ To manage fees. ▶ To collect and recover money that is owed to us. 	<ul style="list-style-type: none"> ▶ Fulfilling contracts. ▶ Our legitimate interests. ▶ Our legal duty (if ever required). 	<ul style="list-style-type: none"> ▶ Being efficient about how we fulfil our legal and contractual duties. ▶ Complying with regulations that apply to us.
<ul style="list-style-type: none"> ▶ To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> ▶ Fulfilling contracts. ▶ Our legitimate interests. ▶ Our legal duty. 	<ul style="list-style-type: none"> ▶ Complying with regulations that apply to us. ▶ Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> ▶ To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. 	<ul style="list-style-type: none"> ▶ Our legitimate interests. ▶ Our legal duty. 	<ul style="list-style-type: none"> ▶ Complying with regulations that apply to us. ▶ Being efficient about how we fulfil our legal and contractual duties.

Where we collect personal information from.

Data you give to us:

- When you apply for our course.
- When you talk to us on the phone (only if progressing with your application).
- When you use our websites (course application form only).

¹ No personal data is shared with any organisation without your prior knowledge and consent and then only to recognised, like-minded charities such as The Soldiers' Charity, the RAF Benevolent Fund, the Royal Navy Benevolent Trust or The Brathay Trust. Any data shared is the absolute minimum for the purpose.

² Your consent must be given to our volunteers before data is shared and you will be asked during initial discussions with charity individuals. Consent need not be written, but a record of your consent will be noted and details recorded.

- In emails and letters from us to you, rarely utilised, PoC only.
- In delegate surveys.

Data from third parties:

- Other like-minded charities that introduce delegates to us – minimal data, PoC. Other charities should pass delegate information to us only with their prior consent – we will check with the delegate this has happened before progressing.
- Government and law enforcement agencies if ever approached and only under our legal obligations.

Who we share your personal information with.

We may share your personal information with these organisations:

- Form A data with mainstream military benevolent charities for proof of service for funding and/or requirements (each has their own stringent data protection policies). (See footnote above).
- The Brathay Trust, has its own stringent data protection policies due to its own work with disadvantaged children and vulnerable adults. Included is The Brathay Research Trust's Research Hub (<https://www.brathay.org.uk/research/our-research>).

If you inform us your data information subsequently changes or you wish to be 'forgotten', F4H will inform third parties with whom data may have been shared previously, letting them know of the change in circumstances.

Automated Decisions

We do not use your information to make automated decisions.

Data Outside the EEA.

We do not send data outside of the EEA.

If you choose not to give personal information

If a potential delegate chooses not to give us personal information it *may* stop attendance on our course.

'Marketing' – Information sharing³

We will not undertake Direct Marketing, as in '*...the action or business of promoting and selling products or services, including market research and advertising...*'

We may use generic information from Facebook posts, Twitter, (all non-attributable, unless prior consent agreed for each post) to share information about relevant news and opportunities. Both our Closed and Open FB accounts are 'opt in' by delegates.

How long we keep your personal information

We will keep your personal information for up to 5 years to enable F4H to:

- Respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records.

We may keep your data for longer if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

³ NOT personal data.

How to get a copy of your personal information

You can access your personal information we hold by emailing us at admin@f4h.org.uk or by writing to the following address, both addressed to The CEO.

C/O The Accountant
RHQ RTR
Stanley Barracks
Bovington
Dorset
BH20 6JB

Letting us know if your personal information is incorrect

You have the right to question any information F4H has about you that you think is wrong or incomplete. Please contact us using the above PoCs if you want to do this.

If you do, we will take all reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you do not want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data or ask us to delete it or restrict how we use it or, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us on admin@f4h.org.uk if you want to do so.

How to complain

Please let us know if you are unhappy. You can contact us using the email address above. Any complaint will be dealt with promptly.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to [report a concern](https://ico.org.uk/concerns/) (<https://ico.org.uk/concerns/>)

Sharing data – Your request to F4H

Under GDPR you will have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.