

## Twins Trust's Volunteer Privacy Notice: protecting and respecting your information

### 1. Important information and who we are

This privacy notice informs you as to how Twins Trust looks after the personal information of our volunteers, what your privacy rights are and how the law protects you. As a valued volunteer you need to be clear and comfortable with how we collect your personal information and what we do with it.

Your personal data is any data that identifies you, or which can be identified as relating to you personally and we refer to it as "personal information" in this privacy notice. Your personal information will be collected and used by **Twins Trust**, with charity number (Eng & Wales ) 1076478, (Scotland) SC041055, and data controller number Z6573649, based at Manor House, Church Hill, Aldershot, Hampshire, GU12 4JU.

For the purposes of data protection law, Twins Trust is the 'Data Controller'. This means that we are responsible for deciding how we hold and use personal information about you, technically referred to as 'processing' personal information. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that the personal information we hold about you is accurate and current, if it is not then we will be breaching data protection law. Please keep us informed if your personal information changes during your relationship with us.

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial changes. We will also inform you in other ways from time-to-time about the processing of your personal information.

### 2. Data protection principles

We comply with data protection law which dictates that the personal information we hold about you must be:

- ✓ Used lawfully, fairly and in a transparent way.
- ✓ Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- ✓ Relevant to the purposes we have told you about and limited only to those purposes.
- ✓ Accurate and kept up to date.
- ✓ Kept only as long as necessary for the purposes we have told you about.

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✓ Kept securely.

### 3. The personal information we hold about you and its purpose

If you volunteer with Twins Trust, you may be referred to in a variety of documents and electronic records, including your profile on our supporter database. Some of these records are produced by you, such as your volunteer application form. Others are produced by us recording information you have provided to us, or the activity you undertake with us.

We may sometimes collect additional information from third parties, including from people in the form of a reference. We have set out below, in a table format, the ways we collect and use your personal information. Twins Trust will not share your personal information with any other third party without first obtaining your explicit consent.

Information Obtained	Purpose	Shared with third parties
Personal contact name and telephone number	To contact volunteers about their application and if successful their volunteering role. Practical Preparing for Parenthood Facilitators will have their name and telephone number shared with parents that will be attending the course.	Practical Preparing for Parenthood Facilitators will have their name and telephone number shared with parents that will be attending the course.
Personal address and email	To contact volunteers about their application and if successful their volunteering role	No
Communication preferences and marketing opt-ins	To be able to contact volunteers with information about the difference we are making together and how else they can get involved	No
Personal interest in volunteering for Twins Trust	For Twins Trust staff to ensure that the right volunteering opportunities are presented to the volunteer	No
If volunteer is a parent of multiples	Some of the volunteering roles have a pre-requisite of having to be a parent of multiples to apply	No
Two references	To be contacted to confirm volunteer's identity and suitability for the volunteer role	No
DBS and paediatric first aid expiry dates	Collected by Norland practitioners for internal Twins Trust information	No

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## 4. Profiling

We are always striving to better understand our volunteers and supporters, to provide you with a better experience with us. To achieve this, we analyse and research information we have on our volunteers and supporters on our database, to group people together in terms of common characteristics. This enables us to better tailor the information we provide to ensure it is relevant and interesting. We do this as we have a legitimate interest in improving your experience as a supporter.

You can opt out of supporter profiling at any time if you wish. Just contact our Enquiries Team at [enquiries@twinstrust.org.uk](mailto:enquiries@twinstrust.org.uk) or call 01252 332 344.

## 5. Failure to provide information

If you do not provide certain information when requested, we may be unable to deliver on some elements of the volunteering arrangement or, in some circumstances, to comply with our legal obligations (such as to ensure the health and safety of our volunteers, workers or beneficiaries). In such instances we will inform you about the implications of the decision and whether we are able to continue with the volunteering arrangement.

## 6. Legal basis for using your personal information

Twins Trust relies on the following legal conditions that are described in the Data Protection Act 2018 (also known as DPA18) to use your personal information in the ways described in this privacy notice:

- a) *Legitimate interest*: where we have a legitimate interest to do so in support of Twins Trust's mission. We also have a legitimate interest in being able to use and process personal information for internal administrative purposes, and when it is necessary to protect our IT network, data security and ourselves (and our beneficiaries and supporters) from risks such as fraud, criminal conduct or reputational damage.

When processing your personal information based on a legitimate interest, we will make sure that it is exercised proportionately and is always balanced against the privacy rights and other legal rights you have as an individual.

- b) *Your Consent*: We will obtain your consent to communicate with you about wider communications about the charity, outside of the communications related to your volunteering.

## 7. How we will communicate with you

### 7.1 Administrative communications

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We will communicate with you as required to initially process your volunteer application and then, as an active volunteer, to provide you with the support and information you need to undertake your volunteer role. If your role is a public facing role that involves talking about Twins Trust this will include information about our work, case studies and other ways that people can support us. We will do this as we have a legitimate interest in supporting your volunteering role.

You will also receive administrative communications from our Support Team that are related to your volunteering such as a welcome email, volunteer survey and thank you communications.

## **7.2 Marketing and promotional communications**

On your volunteer application form you will have been given an opportunity to 'opt in' and consent to receive wider communications from us about our work, the difference we are making and how you can get further involved. If you have opted in you will receive additional emails from us including our regular email newsletter, and inspiring stories about people whose lives we have changed.

You will also receive information about how you can further support our work through raising awareness, campaigning or financial support. We will try to tailor the information you receive to reflect what we think you will be interested in on the basis of the information we hold about you.

## **7.3 Choices around marketing and advertising**

We strive to provide you with choices about certain personal information uses, particularly around marketing and advertising. You can update your marketing preferences to change what information you receive from us at any time. You can opt-in to start to receive wider communications about our work or opt-out if you no longer want to receive this information.

You can change your marketing preferences at any time if you wish. Just contact our Enquiries Team at [enquiries@twinstrust.org.uk](mailto:enquiries@twinstrust.org.uk) or call 01252 332 344.

## **8. Change of Purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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## 9. What information of yours we share with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the volunteering relationship with you; where we have another legitimate interest in doing so; or you have specifically agreed that we may share your personal information with them.

The following volunteer-related activities are carried out for us by third-parties:

- Your referees provide a reference for your volunteering with us
- Online platform for safeguarding/child protection training module

We may disclose aggregate statistics about our volunteers to describe our services and operations to prospective partners, advertisers, other reputable third parties and for other lawful purposes. These statistics do not include any information that identifies people.

Similarly, Twins Trust may, on an anonymised basis, use your personal information to demonstrate the impact of our services. Any case study information shared will always be on anonymised basis unless Twins Trust have further explicit consent from you.

## 10. How we protect your personal information

Twins Trust considers keeping your information safe to be vitally important. We employ a variety of physical, organisational and technical measures to ensure we do this, and prevent unauthorised access to, use or disclosure of, your personal information.

Electronic data and databases that contain personal information about volunteers are stored on secure computer systems and we manage who has access to that data (using both physical and electronic means).

Our staff receive data protection training and we have a set of detailed data protection procedures and policies which staff must follow when handling personal information.

All hard-copy records and data are managed securely in lockable and access-restricted storage.

## 11. How long we store personal information

We will only use and store personal information for as long as it is required for the purposes it was collected for. We have a data retention policy that sets out the different periods we retain personal information in accordance with our duties under applicable data protection law and various legislative requirements.

Some personal information may be retained by us in archives for historical research purposes and we do this in a manner that complies with applicable data protection law. We continually review what personal information and records we hold, and delete what is no longer required.

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## 12. Your rights

We want to make sure that you are able to make informed choices about how we use your personal information and do so you must understand your data protection rights:

- The right of access in relation to your personal information. You can request your personal information and we will confirm whether or not we have your data and, if we do, provide a copy of the information we hold within relevant timescales (Right of Access – Data Subject Access Request).
- The right to have your personal information that we no longer need erased from our records (Right to be Forgotten).
- The right to have inaccurate personal information amended (Right to Rectification).
- The right to ask us to stop using your information in certain situations (Right to Restrict Processing).
- The right to object to your personal information being used for marketing or profiling (Right to Object).
- A right (in certain circumstances) to have a copy of your personal information provided for reuse in another service (Right to Data Portability).

If you would like further details about your rights or would like to exercise them, please write to our Data Protection Officer at: [data@twinstrust.org.uk](mailto:data@twinstrust.org.uk) or addressed to The Data Protection Officer, Twins Trust, Manor House, Church Hill, Aldershot, Hampshire, GU21 4JU.

We reserve the right to ask for further information to verify your identity (or clarify the information that you are seeking) when we receive such a request.

If you are dissatisfied with the response from Twins Trust, you can contact the UK Information Commissioner's Office (ICO) as follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113 (local rate) or 01625 545 745.