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FearFree Privacy Notice

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Owner: Data Protection Officer

Policy Applicable: All Staff, Volunteers, Contractors and the Public

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Reviewed: Annually

FEAR FREE BREAKING THE CYCLE OF ABUSE

1. Introduction

FearFree Charity Limited (hereafter referred to as "the Company", "we", or "us") is committed to protecting your privacy and ensuring that your personal data is handled in a safe and responsible manner.

This privacy notice sets out the data processing practices of FearFree Charity Limited. We are a charity (1064764) and company limited by guarantee, registered in England (3360057). The registered office is at Oak House, Epsom Square, White Horse Business Park, Trowbridge, Wiltshire, BA14 0XG.

All personal data will be processed and held in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations where applicable, and the Data (Use and Access) Act 2025.

FearFree Charity Limited is registered with the Information Commissioner's Office (ICO) as a Data Controller – registration number **Z8493529**.

FearFree Charity Limited may act as a sole data controller or a joint controller with partner organisations depending on the service, contract or partnership arrangement.

Where FearFree acts as a joint controller, we jointly determine the purposes and means of processing personal data with the relevant partner organisation. Joint controller arrangements set out each organisation's responsibilities for transparency, security, retention, data sharing, responding to rights requests and handling complaints. You may contact FearFree using the details in this notice if you have any questions about how your personal data is used under a joint controller arrangement.

2. What we do

FearFree Charity Limited is a charity providing support to families and individuals affected by domestic abuse, sexual violence and stalking. We operate in the southwest of England, with offices in Devon, Gloucestershire and Wiltshire.

3. How to contact us about your personal data

If you have any requests about your personal data or queries with regard to how we handle your data you can write to us at Data Protection Officer, FearFree Charity Limited, Oak House, Epsom Square, White Horse Business Park, Trowbridge BA14 0XG, or email at **dpo@fearfree.org.uk**

4. Why we process personal data

FearFree collects and processes personal data to support our operations and ensure we can deliver our services effectively and responsibly. Specifically, we collect personal data for the following purposes:

- **To Provide Services**: To deliver and manage the services and support we offer to our service users.
- **For Employment and Human Resources**: To recruit, manage, and support our employees and ensure compliance with employment law and best practices.
- **To Manage Volunteers**: To recruit, train, and support volunteers, and to communicate with them about their roles and responsibilities.
- **For Fundraising and Donations**: To process donations, manage contacts, donor and partner relationships, and comply with relevant legal and regulatory obligations related to fundraising.
- **For Marketing and Communications**: To promote our work, share updates, and inform individuals about events, campaigns, and opportunities to support us - always in accordance with applicable laws and consent preferences.

We ensure that personal data is collected and used only where necessary.

We will also process personal data where necessary to meet safeguarding duties, protect people from serious harm, prevent or detect crime, manage risk, meet contractual and funding requirements, comply with legal and regulatory duties, maintain accurate records, evaluate and improve our services, and respond to complaints, enquiries and data protection rights requests.

We may also use information to produce anonymised reports where individuals are not identified. This may include information used for internal and external performance management, service monitoring, quality assurance, demonstrating the impact of our work, reporting to commissioners or funders, and supporting future tender or grant applications.

5. The legal basis on which we process personal data

FearFree relies upon the different legal basis for processing personal data according to the relationship and purpose for which it is collected, as explained below. Where we are collecting personal data about you for the provision of one of the purposes outlined in this privacy notice, we rely upon:

- **Consent** - The data subject (you) has given consent to the processing activity taking place.
- **Contract** - The processing is necessary for the performance of a contract.
- **Legal Obligation** - The processing is necessary for compliance with a legal obligation.
- **Vital Interests** – The processing is necessary to protect someone's life.
- **Public Task** – The processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.

- **Legitimate Interests** – The processing is necessary for the purposes of the FearFree's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Where we rely on legitimate interests, including any recognised legitimate interest introduced under the Data (Use and Access) Act 2025 where applicable, we will only do so where the processing is necessary, proportionate and does not unfairly override your rights and freedoms.

Personal data collected for the purposes outlined in this notice may be used for direct marketing where this is lawful. For electronic marketing by email, text or direct message, we may rely on the charitable purposes "soft opt-in" introduced by the Data (Use and Access) Act 2025 where you have expressed an interest in, or offered support for, one or more of our charitable purposes, the marketing is solely to further those charitable purposes, and you were given a clear opportunity to opt out when your details were collected. We will provide a simple way to opt out in every subsequent marketing message. Where the soft opt-in does not apply, we will only send direct marketing where we have another lawful basis to do so, including consent where required. We do not sell personal data to third parties.

6. What information we collect and where from

FearFree collects personal information from you directly, for example if you register for our newsletter, make a donation, apply to work or volunteer with us, contact us, or receive support through our services. We may also receive personal data from third parties where this is necessary and lawful, including referral agencies, local authorities, NHS bodies, police, courts, schools, employers, commissioners, funders, professional advisers, Disclosure and Barring Service providers, partner organisations, carers or other people involved in your support. The categories of personal information that we may collect, store and use about you include:

- Name, home address, telephone number, email.
- Your country of birth, nationality.
- Date of birth and gender.
- Passport details, national insurance number.
- Referral details, support needs, risk assessments, case notes, safeguarding information, communication preferences, complaints and records of contact with us.
- Publicly available sources – Companies House, Charity Commission, websites, social media, fundraising platforms, grant and tender platforms.

<u>Special Category Data</u>

- Health data including disabilities.
- Racial or ethnic origin.
- Religious or philosophical beliefs.

- Data concerning sex life or sexual orientation.

Criminal Offence data

- Disclosure and Barring Service (DBS) check outcomes.
- Any other criminal data shared with FearFree.

We will only process special category data where we have an Article 6 lawful basis and an Article 9 UK GDPR condition allowing us to do so. Where required by the Data Protection Act 2018, we will also identify a relevant Schedule 1 condition.

(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

(b) Processing is necessary for employment and social protection law (e.g. monitoring equal opportunities or managing health and safety).

(d) Processing necessary for the provision of health or social care.

We will only process criminal offence data where we have an Article 6 lawful basis and a lawful condition under the Data Protection Act 2018.

(a) Employment, social security, and social protection law (e.g. to carry out background checks for safeguarding purposes).

(b) Substantial public interest (e.g. for the prevention of fraud or safeguarding of children and vulnerable individuals).

(d) Consent (only where appropriate and valid under UK law).

Where providing personal data is required by law, contract, funding requirements or safeguarding procedures, we will explain this where possible. If you choose not to provide information we need, we may be unable to provide some services, process an application, meet legal obligations, investigate a concern, or keep you or others safe.

For fundraising and donations, we may collect and use personal data such as your name, contact details, donation history, payment information, Gift Aid declarations, communication preferences, and records of your relationship with us. We use this information to process and acknowledge donations, manage Gift Aid claims, maintain accurate financial and fundraising records, meet charity, tax, accounting and audit requirements, respond to donor enquiries, manage fundraising preferences and opt-outs, and prevent or detect fraud or misuse of charitable funds. Where necessary and proportionate, we may carry out donor due diligence, including checks against publicly available sources, to comply with legal and regulatory obligations and to protect the reputation and assets of the charity. We may share relevant information with payment processors, fundraising platforms, banks, HMRC, auditors, regulators, professional advisers and other service providers where this is necessary and lawful.

7. Recipients and sharing of personal data

In carrying out our services we use specialist sub-contractors who may process, on our behalf, the personal data we hold. These are:

Infinity8

Purpose: Service User Database Supplier

Website: infinity8 - Home

Clifton IT Limited

Purpose: IT Support and Microsoft 365 account management

Website: Clifton IT - IT Support (Bristol, Bath, Exeter, Plymouth)

Beacon

Purpose: Fundraising Database Supplier

Website: Beacon CRM | Transform how your charity works

BrightHR

Purpose: HR Database Supplier

Website: BrightHR: Award-Winning HR Solutions for SMEs

We will ensure that all the suppliers that we work with respect to your privacy and abide by all UK data protection laws.

We may also share personal data with other organisations where it is necessary, lawful and proportionate. This may include local authorities, NHS bodies, police, courts, safeguarding partnerships, schools, commissioners, funders, auditors, regulators, legal advisers, payroll and pension providers, insurers, emergency services, partner agencies and other organisations involved in your support, safeguarding or the prevention and detection of crime. We may share information without consent where this is necessary to protect someone from serious harm, meet a legal obligation, comply with safeguarding duties, respond to an emergency or support the prevention or detection of crime.

8. Retention periods

We pride ourselves in ensuring that your personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. All personal information collected has a defined retention period, which is in-line with our retention policy.

Retention periods may differ depending on the type of record and the reason it is held. Longer retention periods may apply where records are needed for safeguarding, legal claims, regulatory requirements, contractual obligations, professional guidance, audit, funding

assurance or continuity of support. We regularly review the information we hold and securely delete, anonymise or archive it when it is no longer needed.

Relationship	**Retention period**
Service users	Up to 25 years after closure of support.
Employees	Up to 6 years following the end of employment.
Volunteers	Up to 6 years following the end of volunteering.
Funders	Up to 6 years following the end of the financial year of donation made.
Marketing	Until consent is withdrawn or at the expiration of the marketing campaign.
Recruitment	Unsuccessful applicant data 12 months after appointment of a successful candidate.
FearFree at Work – Partner Organisations.	Up to 6 years following the end of partnership.

9. Children's Information

FearFree provides services directly to children and young people. We will explain how we use children's personal data in clear and age-appropriate language wherever possible. We will consider the child's age, understanding and best interests when deciding how to communicate privacy information, seek consent, involve someone with parental responsibility, or support the child to exercise their rights. Where a child is 16 years of age or younger, we will make reasonable efforts to verify that consent is given or authorised by someone with parental responsibility where consent is the appropriate lawful basis, while also recognising that a child who is Gillick competent may be able to give consent themselves.

We may share children's personal data where this is necessary for support, safeguarding, legal obligations, prevention of harm or working with relevant partner agencies. Where appropriate, we will explain who this information may be shared with and why.

10. Data Subject's Rights

You have the following rights in respect of your personal data. In order for you to exercise these rights, we may need to confirm your identity through a form of ID such as a passport or driving licence so that we can verify that you are the data subject before releasing data to you.

10.1. The Right to be Informed

You have the right to be told about the collection and use of the personal data you provide. This privacy notice sets out the purpose for which we process your personal data, how long we will keep your data and with whom we will share your data. If you want to know more about this right, the ICO has more guidance on their **website**.

10.2. Right of Access

You have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request without undue delay and within 30 days of receipt of your request. This period may be extended by up to two further months where requests are complex or numerous, and we may pause the response period while we wait for clarification from you where this is needed. If you want to know more about this right, the ICO has more guidance on their **website**.

10.3. Right to Rectification

You have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 30 days of receiving the request. If you want to know more about this right, the ICO has more guidance on their **website**.

10.4. Right to Erasure

This right, often referred to as the right to be forgotten, allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 30 days of receiving the request. If you want to know more about this right, the ICO has more guidance on their **website**.

10.5. Right to Restrict Processing

You have the right to ask us to restrict the processing of your data. We will look at any request and inform you of our decision within 30 days of receiving the request. If you want to know more about this right, the ICO has more guidance on their **website**.

10.6. Right to Data Portability

You have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and where that processing is by automated means. We will respond to your request within 30 days of receipt of your request. If you want to know more about this right, the ICO has more guidance on their **website**.

10.7. Right to Object

You have the right to object to our processing of your personal data based on legitimate interests, recognised legitimate interests where applicable, or for the performance of a task

in the public interest/exercise of official authority, including profiling; direct marketing, including profiling; and purposes of scientific or historical research and statistics.

- Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
- Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.
- Scientific/historical research and statistics – your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

If you want to know more about this right, the ICO has more guidance on their **website**.

10.8. Rights relating to Automated Decision-Making including Profiling

You have rights in respect of automated decision-making, including profiling. FearFree does not currently make decisions based solely on automated processing, including AI tools, that produce legal or similarly significant effects on individuals. If you want to know more about this right, the ICO has more guidance on their **website**.

To exercise any of your rights, please contact dpo@fearfree.org.uk.

11. Processing based on consent

Where you have given consent for processing, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal. To opt-out please contact dpo@fearfree.org.uk.

12. Cookies

Our website uses cookies. Please see our cookies policy for full details of the cookies used.

13. Third-party websites

Our website may contain links to other websites that are outside our control and are not covered by this privacy notice. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

14. Security of your personal data

FearFree protects the personal data that it holds with technical and organisational security measures. Our cyber security arrangements and framework of data protection policies, procedures and training are kept under regular review to ensure that we keep the data we hold secure.

We take steps to ensure that personal data is adequate, relevant and limited to what is necessary, kept accurate and up to date where appropriate, and only accessible to staff who need it for authorised purposes.

15. Transfers outside of the UK or EEA

FearFree aims to store and process personal data in the UK wherever possible. Some suppliers or technical support arrangements may involve personal data being accessed, stored or supported from outside the UK. Where this happens, we will ensure that appropriate safeguards are in place, such as adequacy regulations, approved contractual safeguards, transfer risk assessments or other lawful transfer mechanisms required by data protection law.

16. Complaints

The Right to Lodge a Complaint to a Supervisory Authority

If you have any comments, queries or complaints about this privacy notice or the processing of your personal data, please contact our Data Protection Officer at **dpo@fearfree.org.uk** or by writing to Data Protection Officer, FearFree Charity Limited, Oak House, Epsom Square, White Horse Business Park, Trowbridge BA14 0XG.

We will provide a clear way for you to raise a data protection complaint directly with us following our Data Protection Complaints Procedure. We will acknowledge receipt of your complaint within 30 days, take appropriate steps to investigate and respond without undue delay, keep you informed where appropriate, and tell you the outcome of your complaint. You may also complain on behalf of someone else where you have authority to do so, and we may need to verify your identity or authority before responding.

If you are not satisfied with the way that FearFree responds to your complaint, you are entitled to raise the matter with the Information Commissioner's Office (ICO). The ICO enforces and oversees data protection legislation in the UK.

16.1. Information Commissioner's Office

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

Email: **casework@ico.org.uk**

17. Changes to the privacy notice

This privacy notice was first published on 25 May 2018. This privacy notice was last updated in September 2026. If we use your personal data for any new purposes, updates will be made to the privacy notice and changes communicated, where necessary in accordance with current data protection legislation.

Any queries relating to this privacy notice please contact the Data Protection Officer **dpo@fearfree.org.uk**

Last Updated: September 2026

Next review: September 2027