



North Devon Voluntary Services Ltd

GENERAL PRIVACY POLICY (INCLUDING WEBSITE)

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PRIVACY POLICY

1. Important information and who we are

Privacy policy

This privacy policy gives you information about how North Devon Voluntary Services Ltd collects and uses your personal data through your use of this website, including any data you may provide when you sign up for a registration to partner with us, use our services, donate to us, sign up/attend an event/training, nominate or are nominated for an award, contact us using our website contact form, sign up to our newsletter, or take part in a competition or survey.

This website is not intended for children, and we do not knowingly collect data relating to children.

Controller

North Devon Voluntary Services Limited, registered company number 06934612, registered charity number 1133707, is the controller and responsible for your personal data (collectively referred to as "NDVS", "we", "us" or "our" in this privacy policy).

[We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy.] If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact our DPO, using the information set out in the contact details section (paragraph 10).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth, gender and details of your volunteering activities, achievements and efforts recognised.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Image Data** includes any photographs or videos of you.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - contact us through our website;
 - register to partner with us;
 - donate to us;
 - sign up for Devon Connect;
 - sign up for/attend one of our events/awards, training, celebrations, including our forums, networking events or one to one/ group advice;
 - are nominated for an award/nominate someone else for an award;
 - subscribe to our service (including DBS checks) or publications;
 - request marketing correspondence to be sent to you;
 - enter a competition, promotion or survey;
 - give us feedback or contact us; or
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services based inside the UK.
- Identity and Contact Data is collected from publicly available sources such as Companies House, The Charity Commission and the Electoral Register based inside the UK.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where

our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis [and retention period]
Register to partner with us and use our resources, support and other opportunities.	(a) Identity (b) Contact (c) Profile (d) Marketing and communication	Consent: We will ask for your consent to process your personal data We will retain this data for as long as you remain a partner. Once you have ceased becoming a partner your information will be deleted during our next annual data cleanse.
To process and deliver any products/services you purchase from us: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you: To process and deliver the services you purchase from us. (b) Necessary for our legitimate interests: To recover debts due to us. We will retain this data for 6 years.
To process your donation which includes managing payments, fees and charges.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you: To process the donation you have requested. (b) Legitimate interest: Sending you emails about donations you make, internal and external audit for financial or regulatory compliance purposes and analysis to improve our services. (c) Legal obligation: Processing for the purposes of Gift Aid, sending you receipts for your donation and checking fraud on an individual donation. We will retain this data for 6 years.

<p>To process your details for you to sign up/attend any of our events/awards celebrations, including our forum events, networking events or one-to-one/group advice.</p> <p>To cater for you based on faith, dietary or access requirements.</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Image (g) Special category</p>	<p>(a) Performance of a contract with you: So, we can facilitate the event and provide you with an acceptable service.</p> <p>(b) Consent: We will ask you for your explicit consent to process personal data in relation to any faith, dietary or access requirements as this is special category data.</p> <p>(c) Legitimate interests: We may rely on this ground to process and use images of you to promote our charitable services and events in certain circumstances. This will usually be for crowd scenes.</p> <p>We will retain this data until our next annual cleanse and delete if no longer in use/needed.</p>
<p>To process your details in relation to an award nomination.</p>	<p>(a) Identity (b) Contact (c) Special category</p>	<p>(a) Legitimate interest: We collect and use your personal data as we have a legitimate interest to collect awards nominations to promote positive stories and to celebrate the efforts and achievements of people and groups in our community.</p> <p>(b) Consent: Following the judging process, we will seek the consent of the nominees at the awards stage and seek their approval to share their personal data with the judging panel/announcers of the award who may be external third parties. We will seek your consent to process special category data about you.</p> <p>We will retain this data until our next annual cleanse and delete if no longer in use/needed.</p>
<p>To sign you up to Devon Connect, a free online community platform bringing people, services and communities together across Devon. We manage the platform and allow you to share your events, promote your services, recruit volunteers and connect with others working to make a local impact.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>Consent: We will ask for your consent to process your personal data.</p> <p>We will retain this data for as long as you remain a member of Devon Connect.</p>

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Dealing with your requests, complaints and queries.</p> <p>(c) Storing your contact details so we can contact you.</p> <p>(d) Recording your consents.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Image</p> <p>(e) Marketing and Communication</p>	<p>(a) Performance of a contract with you: To deliver our service to you.</p> <p>(b) Necessary to comply with a legal obligation.</p> <p>(c) Necessary for our legitimate interests: To keep our records updated and manage our relationship with you, responding to an enquiry from you, delivering requested information, thank you communication and receipts, maintaining 'do not contact lists' (suppressions).</p> <p>We will review at each annual cleanse and delete if necessary.</p>
<p>To enable you to partake in a prize draw or competition.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Consent: We will ask for your consent to process your personal data.</p> <p>We will retain this data for the duration of the draw/competition and then will be deleted once winner is announced and within one week.</p>
<p>To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests: For running our business, provision of administration and IT services, network security and to prevent fraud).</p> <p>(b) Necessary to comply with a legal obligation.</p> <p>We will retain this data only as long as necessary to fulfil the purposes we collected it for, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data.</p> <ul style="list-style-type: none"> • Form submissions (e.g. contact forms) are retained only as long as needed to respond to your enquiry. • Technical logs and analytics are retained for a limited period and then deleted or anonymised. • Website backups may temporarily store data for security purposes and are automatically deleted or overwritten within 4 weeks.

To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing.	(a) Technical (b) Usage	<p>Necessary for our legitimate interests: To define types of customers for our products and services, to keep our website updated and relevant, to develop our charity and extend our community outreach work and to inform our charity strategy.</p> <p>Analytics data is retained for a limited period to help us improve our services and measure the effectiveness of our communications.</p> <ul style="list-style-type: none"> Based on our current configuration, Google Analytics 4 (GA4) is set to retain user-level data for 14 months. After this period, data is automatically deleted or anonymised.
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	<p>Consent: Having obtained your prior consent to receiving direct marketing communications</p> <p>We will review at each annual cleanse and delete if necessary, unless you contact us and opt out of this beforehand.</p>
To carry out market research through your voluntary participation in surveys.	(a) Identify (b) Contact (c) Marketing and communications	<p>Necessary for our legitimate interests: to study how customers/partners use our products/services and to help us improve and develop our products and services.</p> <p>We will retain this data until our next annual cleanse and delete if no longer in use/needed.</p>
To process photographs and videos of you (posting online, storing, saving, uploading and/or copying) and using them for printed and online materials (including publications, reports, promotional material, websites and social media.	(a) Image (b) Identity (c) Contact	<p>(a) Consent.</p> <p>(b) Necessary for our legitimate interests: To maintain a record of contact details in case we need to contact you regarding the photographs or videos and to keep our records updated.</p> <p>(c) Necessary to comply with a legal obligation.</p> <p>We will retain this data until our next annual cleanse and delete if no longer in use/needed.</p>

Direct marketing

During the partner registration when your personal data is collected, via a consent form, you will be asked to indicate your preferences for receiving direct marketing communications from us via email.

We may also analyse your Identity, Contact, and Profile Data to form a view which products, services, communications and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us via email admin@ndvs.org.uk or phone 01271 866300.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

Cookies

[For more information about the cookies we use and how to change your cookie preferences, please see [Cookie Policy \(UK\) - NDVS](#)]

5. Disclosures of your personal data

We may share your personal data with third parties where necessary, and only for the purposes outlined in Section 3.3 above. These third parties include:

- **Devon Voluntary Action (DeVA) Partners:**
We share a Contact Relationship Management System (CRM) with our DeVA partners, who are listed at www.deva.org.uk. DeVA is a registered charity [1158671], and its partners act as **Joint Data Controllers** for this shared system. This arrangement is governed by a formal **Data Sharing Agreement**, which outlines our mutual responsibilities for data protection and compliance. If you would like a copy of this agreement, please contact us at admin@ndvs.org.uk.
- **Awards Judging Panel and Presenters:**
Where relevant, we may share limited personal data (e.g. nominee names, stories, or achievements) with members of our judging panel or event presenters for the purposes of administering and celebrating our community awards.

We require all third parties to respect the confidentiality and security of your personal data and to handle it in accordance with applicable data protection laws. We do not permit third-party service providers to use our data for their own purposes. They are only authorised to process your data for specified purposes and under our instructions.

6. International transfers

We do not transfer your personal data outside the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We will also delete information if you opt out of any consent previously given. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

We will undertake an annual data cleanse.

9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object at any time to the processing of your personal data for direct marketing purposes (see “opting out of marketing” in paragraph 4 above, for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in paragraph 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful, but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, see Contact details (paragraph 10).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or want to exercise your privacy rights, please contact our DPO; Chief Officer:

- Chief.officer@ndvs.org.uk
- Postal address: Suite 206, Queens House, Queen Street, Barnstaple, EX32 8HJ.

11. Complaints

You have the right to make a complaint at any time to the Information Commissioner (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. [This version was last updated on 16th September 2025]. [Historic versions can be obtained by contacting us].

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.