



## **FNF Privacy Policy**

### **General**

This website is operated by Families Need Fathers Ltd ("FNF"). FNF is a registered charity number 276899 and a company limited by guarantee registered in England and Wales under number 1396139.

FNF does its best to ensure that the contents of its website are accurate. However, FNF will not accept liability for any loss or damage or inconvenience arising as a consequence of any use of or the inability to use any information on FNF website.

Visitors who use this website and rely on any information do so at their own risk. FNF does not represent or warrant that the information accessible via the website is accurate, complete or up to date.

FNF will not be liable (to the fullest extent permitted at law) for any loss, damage or inconvenience arising as a consequence of any use of or the inability to use any information on this site.

FNF takes no responsibility for the contents of linked websites and links should not be taken as endorsement of any kind. FNF has no control over the availability of the linked pages.

### **Privacy Policy**

#### **1 Background**

- 1.1 This Privacy Policy including our Terms of Use above sets out the basis on which we may process your personal data and information. FNF is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then FNF will only use it in accordance with this privacy policy.
- 1.2 FNF may change this policy from time to time by updating this page. You should check this page from time to time and ensure that you are happy with any changes.
- 1.3 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our sites,

you are accepting and consenting to the practices described in this Privacy Policy.

- 1.4 FNF fully respects your right to privacy and will not collect personal information about you on this website without your permission. Any personal information which you volunteer will be treated with the highest standards of security and confidentiality.
- 1.5 For general web browsing no personal information is revealed to us although as with most sites, Google and others may be collecting anonymised statistical information which may be passed to us so we can improve our communications with users of our services.
- 1.6 We do track general information about people visiting our website for statistical purposes. This does not include any personal information. This information is only used to determine the composition of our visitors and to record common behaviour.
- 1.7 Please see Appendix 1 in this document for information on Legitimate Interests which is the basis upon which we collect and store information.

## **2 The information you provide to FNF**

- 2.1 We may process information about you that you provide to us (including through this website and other websites that we operate ("our sites") and through correspondence by phone, email or otherwise.
- 2.2 These data may include information provided by you:
  - (a) at the time of registering to use our sites, our Helplines, FNF Branches and Groups, booking onto our courses or programmes, emailing us, subscribing to our newsletters and communications, subscribing to marketing, services or programme updates when updating any of the information provided at the time of registering and contact;
  - (b) at the time of purchasing FNF paid or unpaid Membership or making a donation to FNF;
  - (c) at the time when you register with us as an FNF volunteer. This will include a copy of your CV and may include any character references we may request;
  - (d) at the time of subscribing to any other of our services or posting material to our sites; if you complete any surveys that we may invite you to participate in; and in connection with your other communications with us;

- (e) when you complete attendance registers at any of our events, programmes or courses, including those run by third parties;
  - (f) When you send us details of your cases in response to requests from us or otherwise.
- 2.3 The information you give us may include your name, age (within a range), postcode, email address, phone number, gender, who referred you and why you are contacting us. Some additional details may where appropriate occasionally be requested such as ethnicity, employer, affiliated organisations (for example, professional body), job details. Where a payment is required we will request relevant financial details such as bank/account and debit/credit card details related to a specific financial transaction and personal description. We do not store financial details such as card numbers and accounts as these are passed to our payment processor such as PayPal. Only payment processors who are believed to be compliant with GDPR requirements will be used.
- 2.4 For some purposes, we may request and store additional data such as criminal convictions.

### **3 Why we collect information from you**

3.1 According to our interpretation of GDPR, FNF are acting as a Processor of information. Our lawful reason or basis upon which we use (ie process) your personal information is defined as Legitimate Interest. Broadly speaking Legitimate Interests means we can process your personal information if:

- We have a genuine and legitimate reason *and*
- We are not harming any of your rights and interests.

Please read the 'Legitimate Interests' statement in Appendix 1 for more information.

- 3.2 We may also collect and process technical information about your computer, including (where available) your Internet Protocol (IP) address, login information, operating system and browser type and version, for system administration purposes and to report aggregate information to other organisations (including our funders). Please note that when reporting to other organisations only statistical data is provided which does not of itself identify any individual by name.
- 3.3 We will continue to hold your personal details for seven years after your last payment or usage of our website to login or subscribe/unsubscribe to any of our services including attending Branch/Group meetings. You may at any time change your subscriptions on our site either in response to any emails (eg Newsletters) or by logging into your account on our site. You may also contact us in writing to request that we delete your account

from our records which we will do as quickly as we can. Current data which have been provided willingly by you in the past will otherwise continue to be held in our systems unless you specifically ask us to remove them.

## **4 How we use information about you**

4.1 We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- (a) internal record keeping;
- (b) to improve our products and services;
- (c) as a part of our products and services (eg our online Members' Forum);
- (d) to customise the website according to your interests;
- (e) if you register with us, to provide you with information (including our newsletter) relating to similar services, programmes or projects that we may offer from time to time, provided that you opt in of this use;
- (f) when planning changes to our organisation or services.

4.2 FNF will not sell or lease your personal information to third parties and we will only share your data with third parties when:

- (a) it is to provide you with a service or information which you explicitly request from us including any benefits and services (including membership, if relevant) provided by third parties as set out in (2), (3) and (4) above. FNF requires all such third parties to treat your personal information as confidential and to comply with all applicable UK Data Protection Legislation (including General Data Protection Regulations) and Consumer Legislation in place at any given time;
- (b) you have given your express consent;
- (c) where it is necessary to comply with an order from a statutory body which is empowered to require us to release your data; or for us to comply with any legal obligation or to enforce or apply any of our terms which you are subject to or to protect the rights, property, or safety of FNF, our staff, volunteers or others
- (d) If FNF is acquired by a third party, in which case personal data held by it will be one of the transferred assets.

4.3 You can unsubscribe from marketing and communications from FNF at any time by using unsubscribe link on any marketing or communications or by contacting us by email at: [admin@fnf.org.uk](mailto:admin@fnf.org.uk)

4.4 We will stop processing your personal data if you tell us to

- 4.5 We will delete your personal data if you tell us to. The law says we must not contact you again if you ask us not to. This means we might need to keep your contact details to make sure this happens.

## 5 **Security**

5.1 All information you provide to us is stored on secure servers. We adopt appropriate technical and organisational measures to protect the security of all personal data held by FNF, including sensitive personal data. Communications with our site and any payment transactions made will be encrypted.

5.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5.3 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## 6 **What are your rights (your right to see your data and to access information)**

6.1 The new data protection law, from May 2018, gives everyone a number of very important rights. These are:

- (a) Transparency over how we use your personal information (right to be informed).
- (b) Request a copy of the information we hold about you, which will be provided to you within one month (right of access).
- (c) Update or amend the information we hold about you if it is wrong (right of rectification).
- (d) Ask us to stop using your information (right to restrict processing).
- (e) Ask us to remove your personal information from our records (right to be 'forgotten').

- (f) Object "opt-out" to the processing of your information for marketing purposes (right to object).
  - (g) Obtain and reuse your personal data for your own purposes (right to data portability).
  - (h) Not be subject to a decision when it is based on automated processing (automated decision making and profiling).
- 6.2 If you would like to know more about your rights under the data protection law see the Information Commissioners Office [website](#).
- 6.3 Remember, you can change the way you hear from us or withdraw your permission for us to processing your personal data at any time (see SECTION 11).
- 6.4 You have a right to access personal data being kept about you. Any person wishing to exercise this right should complete a Subject Access Request Form (please email [admin@fnf.org.uk](mailto:admin@fnf.org.uk) for a form) alongside copies of two forms of identification as outlined in section 4 of the form.
- 6.5 You may complain to the UK regulator, Information Commissioners Office ([www.ico.org.uk](http://www.ico.org.uk)) if you feel we are not acting fairly.

## 7 **Changes to our privacy policy**

- 7.1 Any changes we may make to our privacy policy in the future will be posted on this webpage and, where appropriate, notified to you. Please check this webpage frequently to see any updates or changes to our Privacy Policy.

## 8 **Links to other sites**

- 8.1 Our website contains links to other websites. FNF does not have any control over the content or security of other websites and cannot be held responsible for your privacy and protection if you choose to visit these websites.

## 9 **Cookie Policy**

- 9.1 It is important to FNF that our websites are easy to use, accessible and reliable. Small files, called cookies, place small amounts of information on your computer or other device used to access the internet, such as a mobile phone.
- 9.2 Cookies may be used on this site to help personalise your visit, to improve how you use the site and to record your online activity. This information cannot be used to identify you personally. You can disable cookies by

adjusting your browser settings, but some functions of the site may not work correctly.

- 9.3 Specifically, the FNF uses cookies to measure how people are using the website so that we can improve the capacity and overall user experience.
- 9.4 Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store and use this information. Google's privacy policy is available at:  
<http://www.google.com/privacypolicy.html>
- 9.5 The [BBC website](#) provides a user friendly outline of cookies and how they work.
- 9.6 Please be reminded that FNF is not responsible for the content on other websites.

## 10 **Data Controller and Processor**

- 10.1 The Data Controller is Families Need Fathers Ltd, 134 Curtain Rd, London EC2A 3AR ([admin@fnf.org.uk](mailto:admin@fnf.org.uk) or 0300 0300 110)

## 11 **How to contact us and whom to complain to**

- 11.1 If you have any questions or concerns regarding our use of your personal data or our Privacy Policy, please contact us using the contact details of our Data Officer, Families Need Fathers Ltd, 134 Curtain Rd, London EC2A 3AR ([admin@fnf.org.uk](mailto:admin@fnf.org.uk) or 0300 0300 110)

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## **Appendix 1: Legitimate Interests Basis**

### **1 Summary**

- 1.1 This appendix forms an integral part of our privacy policy.
- 1.2 Under the new data protection law starting in May 2018 we have a number of lawful reasons that we can use (or 'process') your personal information. One of the lawful reasons is called 'legitimate interests'.
- 1.3 Broadly speaking Legitimate Interests means that we can process your personal information if:
- We have a genuine and legitimate reason, *and*,
  - We are not harming any of your rights and interests
- 1.4 This means when you provide your details to us (members of the public and/or business details of employees/professionals working within the field of shared parenting) or they have been provided to us (business details of employees/professionals working within the field of shared parenting) we use your information for our legitimate interests to carry out our work in the field of shared parenting. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.
- 1.5 Some typical examples of when we might use the approach are for direct marketing, maintaining the security of our system, data analytics, enhancing, modifying or improving our services, identifying usage trends and determining the effectiveness of our work, campaigns and fundraising.

### **2 Our Vision and Objectives**

- 2.1** Our vision is to ensure:
- That we provide broad and comprehensive support to separated parents who believe their children are best served by shared parenting and shared parenting values and that their children deserve to have a meaningful relationship with both their parents and their parents' families.
  - We live in a gender-inclusive society in which shared parenting is the norm and in which most separations and divorces result in the parents collaborating positively and responsibly to give their children the chance of a stable and supportive childhood.



## 2.2 Our objectives are to

- Provide and improve the services and information available to parents who are being denied meaningful relationships with their children by their ex-partners.
- Support and promote responsibly shared parenting in the UK and internationally in order to improve the prospects and happiness of future generations of children – especially those who are growing up in so-called “single” parent families.
- Raise public awareness and act as an advocate for shared parenting by all reasonable means including carrying out and supporting research into shared parenting as well as into the many areas in which children’s lives are afflicted by the inappropriate absence of one or other parent.

## 3 **Our interests**

3.1 The following are some examples of when and why we would use this approach in ensuring the sector has world-class teachers, trainers, assessors and leaders.

- (a) **Marketing and Communications:** We will send postal, text, email, e-newsletters and e-marketing communications and marketing asks which further the aims and objectives of FNF and its beneficiaries. We will also endeavour to enable you to receive only marketing communications from us which are relevant for you and centred on your interests.
- (b) **Online financial transactions:** In order for us to process memberships, donations and orders, payment has to be taken and contact information has to be collected, including name, delivery address, email address and telephone number.
- (c) **Your best interest:** Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.
- (d) **Public research and statistics:** Many of our services such as Newsletter and Membership registration, our helpline and branches/groups will collect information for use in research and statistical analysis in order to determine and improve the progress of shared parenting in society.
- (e) **Analytics:** To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.

- (f) Research: To determine the effectiveness of marketing and communications and to develop our products, services, systems and relationships with you.
- (g) Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our Members, service users and supporters

3.2 We will also hold information about you so that we can respect your preferences for being contacted by us.

#### 4 **Your interests**

4.1 When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will 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).

4.3 As stated above, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time.