

HostNation Privacy Policy

At HostNation we will only collect, process and store information about you that you have willingly provided. We aim to be open about collecting this information and clear about what we will use it for. You do not need to give us any information to use our website, although as a result of your use of the website we may collect cookies and other related information (see below).

We will not share your information with third parties or outside of the European Economic Area (EEA) without your permission unless we are legally permitted or required to do so. There are times when we may be forced to share your information with police, regulatory bodies or legal advisors without your permission (sometimes referred to as ‘breaching confidentiality’). This could be for one of the following reasons:

- where we are disclosing information about an act of terrorism;
- where a court orders HostNation to disclose information;
- where there is reasonable cause to suspect that an adult’s life may be in immediate danger; or
- where there is reasonable cause to suspect that a child or young person may be experiencing or at risk of experiencing significant harm.

What is “Personal Data”?

Personal Data is any information concerned with living individuals who can be identified either from that information alone or in combination with other information that is, or is reasonably likely to become, held by HostNation. Personal data collected and processed by HostNation includes: names, sex, dates of birth, email addresses, phone numbers, occupation, religion, passport information and information relating to the use by individuals of the HostNation website (including IP addresses and cookies).

What is “Sensitive Personal Data”?

Sensitive personal data means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation. Sensitive personal data collected and processed by HostNation includes: racial or ethnic origin, religious or philosophical beliefs and sex.

What Data do we collect and for what purposes?

We collect personal data relating to:

- (a) Befrienders, including: name, date of birth, sex, nationality, address, email address, phone numbers, work status, languages spoken, relevant interests and attitudes (**Befriender Personal Data**);
- (b) Refugees/asylum seekers, including: name, date of birth, sex, nationality, address, mobile number, immigration status, religion, languages spoken, relevant interests and attitudes (**Refugee Personal Data**); and

- (c) Referrers', including: name, organisation name and contact details, (**Referrer Personal Data**).

We collect personal data for the purpose of:

- (a) Befriender Personal Data – ensuring that the befriender is a suitable match to provide stable companionship to the refugee/asylum seeker;
- (b) Refugee Personal Data – ensuring that the refugee qualifies for the HostNation programme and matching the refugee to a suitable befriender; and
- (c) Referrer Personal Data – providing a point of contact for the refugee/asylum seeker.

We may also ask you to 'opt in' to receive further information from HostNation. By opting in, you agree to us contacting you occasionally for feedback about your experiences or with information about our work, by post and email, and to ask for other help in the future. We will never sell or swap your details.

If you change your mind after 'opting in', you can write to info@hostnation.org.uk and let us know.

We will process your personal data on the basis of your consent and/or our legitimate interests (which include the administration and improvement of our website, the provision of information about our services and fundraising activities, management of relationships with our befrienders, refugees and referrers and for compliance with applicable laws, rules and regulations).

How do we process Personal Data?

HostNation processes all personal data in accordance with the data protection principles below:

- (a) **Processing must be fair, lawful and transparent.** The data subject must be told who the data controller is, who the data controller's representative is, the purpose for which the personal data is to be processed, and the identities of anyone to whom the personal data may be disclosed or transferred. Where HostNation is collecting personal data directly, we will do this on or before collection. We will also provide this information to data subjects where we receive personal data from an intermediary. Where sensitive personal data is being processed, more stringent conditions must be met. In most cases, the data subjects' explicit consent to the processing of such data will be required.
- (b) **Processing must be for limited purposes and must be done in an appropriate way.** Personal data must generally only be processed for the purposes notified to the data subject when the data was first collected or for any other purposes permitted by data protection laws. This means that personal data will not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject must generally be informed of the new purpose before any processing occurs, and their consent may be required.
- (c) **Processing must be adequate, relevant and limited to what is necessary for the purposes.** Personal data must only be collected to the extent that it is required for the specific purpose notified to the data subject. Any data that is not necessary for that purpose should not be collected in the first place.

(d) **Personal data must be accurate and kept up to date.** Information that is incorrect or misleading is not accurate and steps should be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data must be corrected, destroyed or erased from our systems, as appropriate.

(e) **Personal data must not be kept longer than necessary for the purpose.** This means that personal data must be destroyed or erased from our systems when it is no longer required for the specified purpose that it was collected for, provided that HostNation may retain personal data in order to comply with applicable laws, regulations and rules.

(f) **Personal data must be processed in line with the rights of data subjects.** Data subjects have a number of rights under data privacy laws. For more information on these rights, see below.

(g) **Personal data must be kept secure.** Appropriate security measures must be taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. HostNation is required to put in place procedures, technologies and other measures to maintain the security of all personal data from the point of collection to the point of destruction.

(h) **Personal data must not be transferred to people or organisations situated outside the European Economic Area unless it will be adequately protected.** Data privacy laws impose restrictions on when personal data can be transferred outside the EEA to a country that does not (according to EU data privacy laws) provide adequate protections for personal data. This includes the USA.

Cookies

When you visit our website we collect non-identifying information to help us to understand how supporters use our site, and to make improvements. This information consists of your IP address, your browser (e.g. Internet Explorer), when you visited and which pages you visited or downloaded during your visit. We cannot use this information to find out any further personal information about you, and we will not share any individual's information unless required to do so by law.

Keeping your data safe

We constantly work to make sure that your data is properly protected through encryption, firewalls and monitoring.

We make sure that your data is only seen by people who need to view it for their work and that our staff are trained in protecting your information.

Keeping your information up to date

Where possible we keep our records up to date and use public records to do this in some cases. We are more easily able to do this if you let us know when your details change.

Right to access your information

You have the right to access the information we hold about you under data protection laws. You also have a right to request the rectification, erasure, restriction or portability of your personal data, and to object to or withdraw consent for the processing of your personal data. We may charge £10 to administer this process. If you want to see your information or exercise

any of these rights, send a description of the information you want to see, your request (including the information you want to access, if applicable) and proof of your identity by email to info@hostnation.org.uk.

Right to complain

If you are not happy about the manner in which we are processing your personal data, please contact us at info@hostnation.org.uk. You also have the right to make a complaint to the UK Information Commissioner's Office.

Data controller

HostNation (registered as a charitable fund under the auspices of Prism the Gift Fund, UK charity number 1099682 of 20 Gloucester Place, London, W1U 8HA, is the data controller of personal data collected through the website.