

VOLUNTEER PRIVACY POLICY

June 2018

We couldn't do any of our lifesaving work without people like you. Whether you're supporting our patients and donor initiatives, involved in our laboratory research, part of our Marrow Programme or helping raise awareness and vital funds, you are an essential part of what we do.

This is our Volunteer Privacy Policy, relating to how we collect and process personal information relating to you in your role as a volunteer, which enables us to engage and support you in all that you contribute as a volunteer. We are committed to being transparent about how we collect and use your information and in meeting our data protection obligations.

What information do we collect?

We collect and process a range of information about you. The type of information that we collect depends on the volunteer role(s) you are carrying out and may include all or some of the following personal data:

- your name, address, email address, contact number and date of birth;
- details of your skills and experience;
- details of your bank account to reimburse you for volunteer expenses;
- details of your emergency contacts;
- your availability to volunteer;
- your passport number;
- details of any unspent convictions where relevant for the role;
- medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments;
- equal opportunities monitoring information, including information about your race, ethnic origin, gender, age, religion or belief, sexual orientation and whether you consider yourself to have a disability. Providing this information is optional, and any information you choose to provide will be made anonymous;
- details of any concerns or complaints raised in line with the 'Dealing with Problems Policy and Procedure' which covers how we deal with, and address any concerns that yourself or others may raise. You can view this policy and other volunteer policies within the volunteering section of our website <https://tinyurl.com/ANVolunteerPolicies>
- details of referees and the contents of the information that they provide
- your photograph for identification purposes;
- your general health; and
- your anticipated location (this does not involve GPS tracking and is only relevant for the Courier volunteer role).

We collect this information in a variety of ways. For example, information is collected through application forms, CVs or resumes; obtained from your passport or other identity documents; from forms completed by you at the start of or during your time volunteering with us and from correspondence with you.

Information is stored in a range of different places, for example via email, in our recruitment portal, our CRM system and sometimes in paper form where a volunteer has expressed an interest in volunteering via this channel. Where volunteer information (such as application forms or health & safety assessments) are in a paper format, this information will be scanned and stored securely.

Why do we process your information?

We need to process your information to ensure that volunteering with us is a positive experience and to encourage mutual understanding about what your volunteer opportunity entails. We also need to process your information to connect you to your internal contact at Anthony Nolan who will support you during your time volunteering with us, and to pay you any out of pocket expenses that you claim in line with our approach to volunteer expenses.

In other cases, we have a legitimate interest in processing personal information before, during and after your time as a volunteer with us. Processing your information allows us to:

- run recruitment processes;
- be able to recognise our volunteers for their contributions. This can be via a formal recognition such as the Anthony Nolan Supporter Awards or via an informal recognition;
- maintain accurate and up-to-date records and contact details including details of who to contact in the event of an emergency. You will need to inform your contact that you have provided us with their details;
- make sure that any concerns or complaints raised are dealt with in a fair manner and in line with the 'Dealing with Problems Policy and Procedure';
- ensure that we comply with our safeguarding and data protection obligations;
- obtain occupational health advice to ensure that we comply with duties in relation to individuals with disabilities and meet our obligations under health and safety legislation in terms of volunteers who participate in and lead events, and in assessing the suitability of someone to undertake the Courier role;
- ensure effective general volunteer and business administration;
- ensure your security and that of other volunteers, and those working with us; and
- maintain and promote equality.

In all cases, we balance our legitimate interests with your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Volunteer Privacy Policy.

Sensitive Information – applies to Courier volunteers only

- There are limited circumstances where we process "special categories" of particularly sensitive personal information about our volunteers, which may include health information (including medication, treatment, medical investigations and any history of deep vein thrombosis). We only process health information in relation to the Courier volunteer role.

Who has access to your information?

Your information will be shared with your volunteer manager and/or lead, and other Anthony Nolan employees who work directly with volunteers. Your information is stored in our customer relationship management system, quality management systems, data management systems, and our IT management systems, including email and Excel. Specific information relating to your role as a volunteer is only accessible by staff within Anthony Nolan who manage volunteers, work within this area, or maintain our systems on the IT side.

We may use external companies to collect or process personal data on our behalf. However, we always carry out comprehensive checks on these companies before we work with them and put a contract in place to set out our requirements, especially in relation to how they manage the personal data they collect or have access to.

For example, Key Travel and Amadeus Mobile Messaging enable us to keep our volunteer Couriers safe via vetting and booking travel on their behalf, and understanding their anticipated location within their Courier trip. "Engage In Learning" is our learning portal that we use to host on-line volunteer training, which enables us to comply with our safeguarding and data protection obligations and volunteer details will also be accessed and stored here.

Some of our suppliers (for example Key Travel and Amadeus Mobile Messaging) run their operations outside the European Economic Area where different privacy laws apply. We only share data with such service providers where we are completely satisfied that adequate levels of protection are in place to protect any information held in that country and the service provider acts at all times in compliance with applicable privacy laws.

How do we protect your information?

We take the security of your information seriously. We have internal policies and controls in place to try to ensure that your information is not lost, accidentally destroyed, misused or disclosed, and is not accessed except as required in the context of volunteer management.

For how long do we keep your information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting, or reporting requirements. 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 requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

When you apply to volunteer, we keep your information in our secure recruitment portal for a two year period, after which we obtain your consent to continue to keep this data. If you stop volunteering with us, we will keep your information for a one year period. If you volunteer for more than one role, then the one year period will only start to run once you no longer volunteer in any capacity.

What if you do not provide personal information?

You are under no obligation to provide us with personal information but if you do not provide us with certain information, such as your details and contact information, we may not be able to comply with our legal obligations. For example, those relating to safeguarding, health and safety, and our obligation to pay any out of pocket expenses that you claim as part of volunteering with us

Marketing & Other Preferences

If you have consented to receive marketing information, then we may contact you via email, text or phone. We may also contact you via post unless you have opted out of receiving marketing information via this method. We will always check against the Mail Preference Service. Prior to carrying out postal mailings addresses are checked against the National Change of Address Update database to verify that we have your latest address, where you have given consent to Royal Mail to pass on your new address to existing contacts.

Where you have given us your consent to contact you by email, text or telephone, or asked not to be contacted by post, then we may use the information you provide us with to match against other sources of data, including publicly available information, to predict the level at which you might be able to support the charity in future. If you let us know that you don't want us to do this we will update our records to stop further mailings as quickly as we can, but you may still receive further mailings which were already in progress prior to your asking us to stop.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer at dataprotection@anthohnolan.org in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer at dataprotection@anthohnolan.org. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this Volunteer Privacy Policy. If you have any questions about this Volunteer Privacy Policy or how we handle your personal information, please contact the DPO at dataprotection@anthohnolan.org. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Updating this Volunteer Privacy Policy

This Volunteer Privacy Policy was updated in May 2018. We will keep it under review and may make updates from time to time. If we make any significant changes to this policy we will provide you with a new Volunteer Privacy Policy. We may also notify you in other ways from time to time about the processing of your personal information.

****Us' or 'we' refers to the registered charity Anthony Nolan (no. 803716 in England and Wales/ no. SC038827 in Scotland) and a company limited by guarantee (company no. 02379280) and Anthony Nolan Trading Limited, a limited company (company no. 02511952).**

Registered address:

The Royal Free Hospital, Pond Street, Hampstead, London, NW3 2QG

Head Office:

2-3 Heathgate Place, 75-87 Agincourt Road, NW3 2NU

****We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number Z3022117 (Anthony Nolan) and Z4877402 (Anthony Nolan Trading Limited).**

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