

Website Privacy Policy

Purpose of this Privacy Policy

This Privacy Policy sets out how and why the ICE Benevolent Fund (registered charity no 1126595 and registered company no 670855) ("Ben Fund") collects and uses your personal information when you visit and use our website and explains your related rights and options.

The Ben Fund website does not automatically capture or store personal information, other than logging the user's IP address and session information such as the duration of the visit and the type of browser used. This is recognised by the Web server and is only used for system administration and to provide important statistics which the Ben Fund draws on to evaluate use of the site.

You may be asked to provide personal information if you want to take advantage of specific services we offer or if you wish to apply for financial assistance. In each case we will only use the personal information you provide to deliver the services you have told us you wish to take part in.

The Ben Fund is the "controller" of your personal information: this means that, as an organisation which collects and uses your personal information, we have a number of legal obligations owed to you with which we must comply. The Ben Fund's Privacy Manager is Mrs Kris Barnett. She can be contacted on 01444 417979, kris.barnett@ice.org.uk.

How do we collect your personal information?

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.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies. [You can see our cookies policy here.](#)
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources.

What personal information do we collect and use?

The personal information we collect, and use can be grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.



- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **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.
- **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.

Why do we use your personal information?

We use your personal information to:

- allow you to use our website
- offer you an improved and more personalised experience of our website
- administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing

Our lawful basis for using your personal information

UK data protection law requires us to have a “lawful basis” to collect and use your personal information. A lawful basis is a justification for collecting and using your personal information which is recognised and permitted by applicable data protection law.

Depending on the purposes for which we use your personal information, we may rely on one of the following lawful bases:

1. **Consent:** where you give us clear consent to collect and use your personal information for a specific purpose. You may withdraw consent at any time by emailing us at kris.barnett@ice.org.uk. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
2. **Performance of a contract:** where we need to use personal information to perform a contractual obligation under a contract with you or to take steps at your request prior to entering into a contract with you for example to process a donation or to provide



our services.

3. **Legal obligation:** when we need to use personal information to comply with applicable law (not including contractual obligations).
4. **Vital interests:** in rare circumstances it may be necessary for us to use your personal information to protect the vital interests of you or another individual (for example to provide your details to a medical professional in the case of a medical emergency).
5. **Performing a task carried out in the public interest:** using your personal information is necessary to perform a task in the public interest. For example, where we provide you with support, assistance or care.
6. **Legitimate interests:** where using personal information is necessary to achieve our, your or society's "legitimate interests". As a general comment, "legitimate interests" means any valid and genuine operational, charitable, legal or medical reason to collect and use personal information. We will only rely on this lawful basis where, on balance, the impact of our doing so does not pose an undue risk of adverse impact for you.

Sharing your personal information with third parties

We will not share your personal information with third parties without your consent unless the law allows us to. We may disclose your personal information to the following third parties, to enable us to provide our services, fulfil our charitable objectives or comply with our legal obligations:

- Analytics and search engine providers that help us improve the functionality and experience of our website and how you use it
- Third parties in connection with or as a result of restructuring or reorganisation of our operations, for example if we merge with another charity. In such event we will undertake due diligence to ensure that the relevant third party can comply with applicable data protection law
- Third parties to whom we are required to disclose personal information under a legal obligation (for example for the purposes of fraud prevention or tax compliance)
- We also need to disclose personal information to third parties that provide services for us, for example our legal advisors, accountants, IT service providers and parties providing mailing and marketing services. We select all our service providers with care and only share with them the minimum amount of personal information required to provide their service. We put appropriate agreements in place that require third parties to comply with data protection law and protect your personal information with the same care as we do



- Public authorities, government departments, statutory agencies and regulators, such as the police, HMRC, HMCTS, the Charity Commission or the ICO
- Where necessary to establish, exercise or defend legal rights

Security

We are committed to ensuring that your personal information is secure when in our care.

We implement technical (i.e. IT / technological) and organisational (i.e. physical / documentary) measures to ensure a level of security appropriate to the potential risks which may arise from our use of your personal information.

Please note, we interact via the internet and email, and no external data transmission over the internet can be guaranteed to be 100% secure. While we strive to safeguard your personal information and mitigate any risks as far as possible, we cannot guarantee the security of the information you provide online, and you do this at your own risk.

Transfers of personal data to other countries

We may transfer your personal information outside the UK.

There are no adequacy regulations in respect of some of these territories outside the EEA. This means that some of the territories to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

To ensure that your personal information does receive an adequate level of protection, we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection.

Keeping your personal information up to date

We take care to ensure that your personal information we hold is up to date and we would appreciate it if you could let us know when your contact details or other relevant information change.

How long will we keep your personal information?

Usually, the personal information collected and used when you visit our website is kept only for the duration of your visit. We do keep analytical statistical information about website use, but this is kept in an anonymised format (i.e. from which you cannot be identified). Please see our [cookie policy](#) for more details.



Your rights and how to exercise them

You have a number of specific rights with regards to your personal information:

1. Right of access – You can contact us to find out what personal information we hold about you and ask for copies of the records which contain that personal information.
2. Right of rectification – If you believe that any of your personal information that we hold is incorrect or incomplete, please contact us as soon as possible. We will correct any information found to be incorrect.
3. Right of erasure – If you want to remove your personal information from our records, you can contact us to ask us to do so. We will remove the information as far as it is practical within our power, and where we are not legally obliged or entitled to retain it.
4. Right to object – contact us if you want to formally object how we are using your personal information. This right only applies in certain circumstances.
5. Right of restricting processing – you might be able to restrict how we use your information if you have made a valid objection. You can ask us to suspend a particular use of your personal information, for example if you want us to establish its accuracy or you're questioning our lawful basis for processing it. This right only applies in certain circumstances.
6. Right of portability – you may have the right to have the personal information we hold transferred to another organisation.
7. Right to withdraw consent – you may withdraw consent at any time by contacting kris.barnet@ice.org.uk. Please note that this will not invalidate use of your personal information which took place prior to your withdrawal of consent being received and actioned.
8. Right to complain – if unhappy with how we are using your personal information, you can lodge a complaint with the ICO (the UK data protection regulator: <https://ico.org.uk>). If you have any concerns about how we have used your personal information, we would appreciate it if you contacted us in the first instance so that we can consider your concerns and see if we can address them.
9. Rights related to automated decision-making – you have the right not to be subject to automated decisions (I.e. by a computer or similar electronic system which uses personal information to analyse or evaluate certain aspects relating to that person or make predictions about them without human involvement) which have a legal or similarly significant impact on you.

The Ben Fund does not subject your personal information to automated decision-making techniques or systems. If that changes, we will update you.



To exercise your rights, please contact kris.barnett@ice.org.uk. Please note that some of these rights only apply in specific circumstances (such as the right to erasure or right to restriction).

Links to other websites

Our website may contain links to other websites, for example social media websites or websites of organisations we work with to provide our services. We are not responsible for those websites or their data protection compliance practices. Please note that we do not have any control or influence over the relevant website or controller of your personal information. You should view the privacy policies of the relevant website to learn more about how those controllers collect and use your personal information (which may be different from how we use it).

Changes to this Privacy Policy

This Privacy Policy will be revised and updated from time to time to reflect any changes to the way we handle your personal information or new legal requirements. We will advertise any changes on our website or, if the changes are material, we will bring them to your attention directly.