



Sunrise Diversity Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post: Sunrise Diversity, The Castle Centre, 25 Castle Street, BARNSTAPLE, Devon, EX31 1DR, GB

Telephone: 01271 328915

Email: admin@sunrisediversity.org.uk

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Addresses
- Date of birth
- Health information (including dietary requirements, allergies and health conditions)
- Health and safety information
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Records of meetings and decisions
- Identification documents
- Information relating to compliments or complaints
- Information relating to sponsorship

We also collect or use the following special category information to **provide services and goods, including delivery**. This information is subject to additional protection due to its sensitive nature:



- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

We collect or use the following information to **prevent, detect, investigate or prosecute crimes**:

- Names and contact information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Video and CCTV recordings of public areas (including indoor and outdoor spaces)
- Financial transaction information
- Information relating to health and safety

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Location data
- Website and app user journey information
- Information relating to sponsorship
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

We collect or use the following information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)



- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We also collect or use the following special category information for **recruitment purposes**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Information relating to health and safety
- Correspondence

CCTV

Sunrise uses CCTV at the entrance to our premises to help protect the safety and security of people who use our services, staff, volunteers and visitors. The camera is motion activated and is positioned to capture the area immediately around the front door only. We have positioned the camera carefully to ensure that it captures only the information necessary for security and safeguarding purposes and does not unnecessarily monitor surrounding areas.

CCTV is used to:

- help keep people safe when accessing our premises;
- support safeguarding responsibilities;
- prevent and investigate crime, damage or incidents; and
- provide evidence where an incident requires further action.

Our lawful basis for using CCTV footage is our legitimate interests in protecting individuals, maintaining a safe environment, protecting our premises and



investigating incidents. We may also use CCTV footage where necessary to comply with legal obligations, including safeguarding responsibilities.

Live CCTV footage is available to authorised staff through wall-mounted viewing tablets located within the premises. This allows staff to identify visitors and support the safety of people entering the building.

Access to recorded CCTV footage is restricted. Only authorised staff who require access for a legitimate purpose, such as investigating an incident, safeguarding concern or security issue, will be able to view recorded footage through the CCTV application. Access is not routinely provided to all staff.

CCTV footage is stored locally on a secure memory card within the camera system and is not stored in the cloud or on other external systems. The system records on a continuous loop, with older footage automatically overwritten when the available storage capacity is reached. The retention period will depend on the storage capacity and usage of the system, but footage will normally only be retained for as long as necessary for security and safeguarding purposes.

Where footage relates to a specific incident, such as a suspected criminal offence, safeguarding matter or legal claim, the relevant footage may be downloaded and retained separately by an authorised member of staff for as long as necessary to deal with the matter. Where appropriate, footage may be provided to the police or other relevant authorities. Once the matter, including any legal proceedings, has concluded and the footage is no longer required, it will be securely deleted.

CCTV footage may be shared where necessary and lawful with:

- the police or other emergency services following an incident;
- safeguarding authorities where there is a concern about the safety or welfare of an individual;
- insurers, legal advisers or other professional advisers where necessary; and
- other organisations where we are legally required or permitted to share information.

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.



Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Sunrise collects and uses personal information where it is necessary for our legitimate interests in delivering our charitable purposes and running the organisation effectively. This includes managing referrals, communicating with people who access our services, coordinating volunteers, administering donations, maintaining accurate records, evaluating and improving our services, ensuring safeguarding, preventing fraud, and meeting our governance responsibilities. We only collect information that is relevant and necessary for these purposes. Before relying on legitimate interests, we consider the potential impact on individuals and ensure that our use of personal information is proportionate, expected and does not override their rights and freedoms. We have appropriate safeguards in place to protect personal information and individuals can object to this processing where the law allows.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **prevent, detect, investigate or prosecute crimes** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk



of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- We process personal information where necessary to help prevent, detect and investigate fraud, theft, safeguarding concerns, misuse of our services, and other unlawful activity that could affect our beneficiaries, staff, volunteers or the charity. This processing helps us protect individuals, safeguard charitable funds and assets, maintain the integrity of our services, and comply with our legal and governance responsibilities. We only use personal information that is relevant and necessary for these purposes. We consider the impact on individuals' privacy and ensure that our use of personal information is proportionate, limited to what is required, and supported by appropriate security measures. We do not use this information in ways that override the rights and freedoms of the individuals concerned.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We use personal information to keep beneficiaries, volunteers, donors, supporters and other individuals informed about our services, activities, events and other updates relevant to their relationship with Sunrise. This helps us deliver our charitable objectives, ensure people receive important information about the services they use or support, and maintain effective communication with those involved in our work. We rely on legitimate interests only where individuals would reasonably expect to receive these communications and where doing so does not override their rights and freedoms. We only use the minimum personal information necessary, provide clear opportunities for individuals to opt out of non-essential communications where appropriate, and have measures in place to protect personal information. Where consent is



required by law, such as for certain marketing communications, we will obtain and respect that consent.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Sunrise uses personal information during recruitment to identify, assess and appoint suitable employees and volunteers who have the skills, experience and qualities needed to support our charitable activities. Collecting and using this information helps us make fair and informed recruitment decisions, maintain safe and effective services, and ensure that individuals appointed to roles are appropriate for the responsibilities involved. We only collect information that is relevant and necessary for the recruitment process. We handle applicants' information securely, provide clear information about how it is used, and retain it only for as long as necessary. We consider the privacy rights of applicants and ensure that our legitimate interests in recruiting suitable people do not override the rights and interests of the individuals concerned.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Sunrise uses personal information to respond to enquiries, manage complaints, resolve concerns and handle any claims made by individuals. This helps us provide a responsive service, address issues fairly, learn from feedback, improve our activities and ensure that we meet our responsibilities as a charity. Using personal information for these purposes benefits both the individuals contacting us, by enabling us to properly consider and respond to their concerns, and Sunrise, by helping us maintain safe, effective and accountable services. We only collect and use information that is necessary for dealing with the query, complaint or claim, and we take appropriate steps to protect individuals' privacy and ensure their rights and interests are respected.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- CCTV footage or other recordings
- Health care providers
- Schools, colleges, universities or other education organisations
- Councils and other public sector organisations
- Publicly available sources
- Suppliers and service providers
- Third parties:
 - Sunrise may receive personal information from third parties where this is necessary to provide support, manage services, or meet our safeguarding and organisational responsibilities. These third parties may include referral partners, other charities and community organisations, family members or representatives acting on behalf of an individual, advocates, and relevant



agencies involved in supporting the people who use our services. We only receive information from third parties where there is a lawful basis for doing so, where it is relevant to the support or service being provided, and where appropriate safeguards are in place to protect individuals' privacy.

How long we keep information

Our data will only be kept for as long as there is an administrative need to do so in order to enable our charity to carry out its business or support functions, or for as long as it is required to demonstrate compliance for audit purposes or to meet legislative requirements.

In general, records are kept for 6 years after the end of the accounting year to which they relate but we do not keep personal records any longer than necessary and certain records may be required to be retained for longer. Factors affecting retention periods include legal requirements, storage costs, historical value, industry standards, and archival needs.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

Plinth (case management system provider)

This data processor does the following activities for us: Provides a case management system used by Sunrise to securely record and manage information relating to people who use our services, including case notes and related support records.

Microsoft 365 (email, cloud storage and productivity services provider)

This data processor does the following activities for us: Provides email, document storage, file management and collaboration tools used by Sunrise to communicate, store and manage organisational information securely.

QuickBooks (accounting and payroll software provider)

Processes financial information, accounting records and payroll information to support Sunrise's financial management, reporting and compliance responsibilities.

Kualo (website hosting provider)



Hosts and supports Sunrise's website and associated online services, including processing information submitted through website forms or enquiries.

LocalGiving (fundraising platform provider)

Processes donor and fundraising information to enable Sunrise to receive donations, manage fundraising activities and maintain supporter records.

Others we share personal information with

- Organisations we need to share information with for safeguarding reasons
- Professional or legal advisors
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Emergency services
- Other relevant third parties:
 - * Local authorities and safeguarding organisations where information needs to be shared to protect children, vulnerable adults, or others at risk of harm.,
 - * Health and social care professionals where sharing information is necessary to support an individual's needs and is lawful and appropriate.,
 - * Referral partners, charities and community organisations involved in supporting individuals who use our services.,
 - * Emergency services where sharing information is necessary to protect someone's health, safety or wellbeing.,
 - * Professional advisors, such as legal, HR, governance or specialist consultants, where required to support the effective running of Sunrise.,
 - * Regulatory and statutory bodies, such as charity regulators, HMRC, or other authorities where we are legally required to provide information.,
 - * Auditors, inspectors or funders where information sharing is necessary for assurance, compliance or reporting purposes.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: admin@sunrisediversity.org.uk

Telephone: 01271 328915



Post: Sunrise Diversity 25 Castle Street Barnstaple Devon EX31 1DR

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>