



# Boromi Privacy Policy

## Summary

At Boromi, we are committed to protecting and respecting your privacy. This policy explains what information we collect about people who use our programmes, how we use it and how we keep it secure. We ask that you please read this privacy notice carefully.

This privacy notice contains important information on how and why we collect, store, use and share certain personal information, your rights in relation to your personal information we collect and who to contact should you have a complaint. In collecting certain personal information about you, we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom), and we are responsible as 'controller' of that personal information for the purposes of those laws.

We will review and update this privacy statement as required, so you are always aware of how we are using your personal information. Please check this document periodically to ensure that you are happy with any changes.

We hope that this policy statement will answer the questions that you may have about how we manage and protect your details, but if you have any questions which are not answered by this statement, please contact us at [dataprotection@boromi.co.uk](mailto:dataprotection@boromi.co.uk), our team are always happy to help!

## Additional information:

'Boromi Ltd' is incorporated in England and Wales with company number 10871836. Our registered office is Eyebrook House, Stockerston, Leicestershire, LE159JD.

'Boromi Ltd' are a registered data controller; registered with the Information Commissioner's Office (ICO). The public register of data controllers is available online at [ico.org.uk/register](https://ico.org.uk/register).



# 1. What information do we collect about you?

We collect and store the minimal amount of information needed for us to be able to offer our programmes and to ensure they are as impactful as possible. Examples of when Boromi will collect your information include:

- You take an interest in signing up for Boromi, Keepmi, #dailyplay or any of our programmes
- You register for the above programme(s)
- You get in touch via our website enquiry form
- You contact us directly or sign up to our mailing list
- You apply for a role within the Boromi HQ team

Boromi collects, stores and uses the following types of personal information when it is made available to us over the course of our communications and programme:

## **Organisational information:**

- Organisation name
- Lead contact details (including names, numbers and contact address)
- Publicly available demographic information

## **Personal information:**

- Your name
- Your contact details (including postal address, telephone number, email and/or social media identity)
- Date of birth
- Gender
- Ethnicity, disability, faith, sexual orientation, gender, gender identity and whether you were eligible for free school meals for monitoring purposes
- Engagement in programme(s)
- Marketing preferences
- Information about your activities on our website and about the device you use to access it (which may include your IP address, geographical location, browser type and version, referral source, entry page, exit page, length of visit, number of page views, route taken through website and similar information) in anonymised form; and
- Any other information you may choose to share with us



### **Pupil information:**

*So that we're able to run our programmes, we will also collect some information – if applicable to programme – about the young children who use our services:*

- Full name
- Date of birth
- Home address
- Gender
- Ethnicity, disability, faith, sexual orientation, gender, free school meals eligibility and home language for monitoring purposes
- Engagement in programme(s)

Certain types of personal information are in a special category under data protection laws, as they are considered to be more sensitive. Examples of this type of sensitive data would be information about health, racial or ethnic origin, religious beliefs or sexual orientation. We only collect this type of information to the extent that there is a clear reason for us to do so, for example where we ask for information for the purpose of providing appropriate services or support. You are under no obligation to provide information for equal opportunities monitoring purposes.

## **2. How do we collect your data?**

### **Direct from individual**

We collect information direct from you when:

- You take an interest in signing up for Boromi, Keepmi, #dailyplay or any of our programmes
- You register for the above programme(s)
- You get in touch via our website enquiry form
- You contact us directly or sign up to our mailing list
- You apply for a role within the Boromi HQ team

When information is collected, Boromi will provide a privacy statement to clearly explain what it is for, how data will be used and provide clear guidance about the rights of the individual.

### **Publicly available information, third parties and external sources**

We may gather publicly available information about you, to help us administer and deliver our programme. We may also receive data from a third party or external source (i.e. not directly from the individual). Where this is the case, the individual will either have previously opted in to this data collection, or will be notified that we have obtained their data, how we intend to use it and their rights to withdraw at any time.



### 3. How do we use your information?

We only collect information that is fundamental to the running, monitoring and evaluation of our programme. In order to provide the best support possible to our families and schools, we will use your personal information to:

- Further our social purpose
- Administer and deliver our programme
- Evaluate, improve, personalise, and expand our programmes
- Undertake research analysis
- Better understand and analyse how you use our programme
- Help us develop new products, services, features, and functionality
- Promote the work of Boromi through our website, social media, promotional materials, publications, press releases and other illustrations of our work
- Engage current and potential funders with opportunities to support our work and make what we do possible
- Generate reports on our programmes
- Recruit, employ and manage staff and volunteers
- Allow us to communicate with you, as well as being able to respond to enquiries, requests and complaints
- Meet our legal obligations
- Undertake due diligence and manage risks

We use your Personal Data on legitimate grounds and/or with your Consent.

#### Data Protection Principles

We promise to follow the following data protection principles:

- Processing is lawful, fair, transparent. Our Processing activities have lawful grounds. We always consider your rights before Processing Personal Data. We will provide you information regarding Processing upon request.
- Processing is limited to the purpose. Our Processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and Process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.



## 4. How is your data stored?

### Making sure your data is secure

We take our responsibility to protect your personal data very seriously. We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org).

## 5. Who do we share your information with?

We may disclose information about you to any of our employees, directors and advisory board members as is reasonably necessary for the purposes set out in this privacy statement. All roles mentioned above receive training in matters relating to Data Protection and confidentiality, and are required to agree to Boromi's privacy statement.

We will never sell or rent your information to third parties for marketing purposes. However, we may disclose your information to third parties in the UK and overseas, in connection with the other legitimate purposes as set out in this policy. These third parties may comprise of (including information about what data they collect, where they store the data and why they need it):

Supplier/Service	Details	Location	Supplier Security and Privacy Information
Google Suite	Email, document management, collaboration tools	Worldwide	<u>Security and Trust</u>
Microsoft Office 365	Email, document management, collaboration tools	Europe	<u>Trust and Privacy information</u>
MailChimp	Email marketing	USA	<u>Privacy</u>
Google Analytics	Web tracking activity	Worldwide	<u>Data Privacy and Security</u>
Xero	Accounting Software	USA	<u>Security / Privacy</u>



We only work with processing partners who are able to ensure adequate level of protection to your Personal Data. We disclose your Personal Data to third parties or public officials when we are legally obliged to do so. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

### How we share personal data

Boromi has never and will never share any personal data that we hold with any unrelated third parties without the explicit and informed consent of the individual. We only share personal data with the following parties:

- Potential and current funders (anonymised statistics only to demonstrate impact)
- Where we have a legal or regulatory obligation to share data or information with the police, social services or emergency services
- Third party suppliers where we need to share information with providers who help us to deliver our services, projects or activities (please see: *Transferring data overseas* above)

## 6. How long do we keep your personal data?

Boromi will only store your data for as long as is necessary and in line with the original purpose that it was collected. After this time, all information will be securely destroyed from all of our systems. The following criteria will be used to make a decision about what data to keep and what to delete:

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with data protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless there is reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data?	Continue to use	Get consent
Can the data be anonymised?	Anonymise data	Continue to use



## How data will be deleted

*Physical data will be destroyed safely and securely, including shredding. All reasonable and practical efforts will be made to remove data stored digitally.*

- Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
- Where deleting the data would mean deleting other data that the society has a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

## 7. How do we use cookies?

### What is a cookie?

Cookies are small text files that are placed on to your device (computer, smart phone etc) when you first visit a website which monitors interactions with the site. When you visit our websites, we may collect information from you automatically through cookies or similar technology. For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

### How does Boromi use cookies?

We use cookies in a range of ways to monitor your interactions with our website and we use this information to continually improve our website and to keep our content relevant.

There are a number of different types of cookies. Our website uses the following:

- **Functional:** We use these cookies so that we can recognise you on our website, remember your previous visits, and the preferences you made. We use a mix of first-party and third-party cookies to do this.
- **Advertising:** We use these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share anonymous data with third parties for advertising purposes, for example, to enrich our anonymous analytics data with interest and demographic categories.

We also use Google Analytics to measure traffic on our website. Google has their own Privacy Policy which you can review [here](#). If you'd like to opt out of tracking by Google Analytics, visit the [Google Analytics opt-out page](#).

### How to reject cookies

You can block cookies altogether by selecting the appropriate settings in your browser. However, in a few cases, some of our website features may not function as a result. For further information on blocking cookies visit the above website.



## 8. Your data protection rights

When Boromi collects, holds and uses an individual's personal data, that individual has the following rights over that data. Boromi will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights:

- *Right to be informed:* whenever Boromi collects data, it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* individuals can request to see the data Boromi holds on them and confirmation of how it is being used. Individuals can contact the Data Manager at [dataprotection@boromi.co.uk](mailto:dataprotection@boromi.co.uk) and requests will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. Any requests for data to be updated will be processed within one month.
- *Right to object:* individuals can object to their data being used for a particular purpose. Boromi will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to erasure:* individuals can request that all data held on them be deleted. Personal data will only be held for the duration during which it is reasonably necessary in relation to the purpose for which it was originally collected. If a request for deletion is made we will comply with the request unless:
  - i) There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
  - ii) There is a legal requirement to keep the data.
- *Right to restrict processing:* individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, Boromi will restrict the data while it is verified).
- *Right to be forgotten:* Boromi will remove or anonymise your personal data within one month of any request for you to ask to be removed.

You can exercise your rights by sending us an email at [dataprotection@boromi.co.uk](mailto:dataprotection@boromi.co.uk).





## How you can withdraw your consent

Consent can be withdrawn at any time by:

- Unsubscribing from an email or newsletter
- Contacting the Data Manager at [dataprotection@boromi.co.uk](mailto:dataprotection@boromi.co.uk)

Parents can also withdraw consent on behalf of themselves or their child at any point, but this may impact their ability to fully participate in the programme.

## Changes to this policy

We will inform you prominently on our website when this privacy notice changes and provide a jargon-free summary of the changes.

## Incident response

Any data breach will be reported to appropriate authorities within 72 hours of the breach being found, and Boromi will liaise fully with appropriate authorities to respond to the breach.

## How to contact us

If you have any concerns or questions about your data, the information contained within this notice or you wish to exercise one of your data protection rights, please do not hesitate to contact us at [dataprotection@boromi.co.uk](mailto:dataprotection@boromi.co.uk). If you are dissatisfied, or if you believe your data has been processed in a way that is not compliant with the GDPR, you also have the right to complain to the Information Commissioners Office (ICO) by visiting their [website](#) or by calling 0303 123 1113.

## Review of this Policy

We regularly review this policy. This policy was last updated on 3rd June 2020.

A handwritten signature in black ink, appearing to read "E Keough".

Evie Keough  
Founder of Boromi and Data Manager