



## Privacy Policy

The Association for Real Change is committed to safeguarding privacy for everyone. We understand that providing personal and sensitive information is an act of trust and we treat your information with respect and integrity.

### Parties and interpretation

“we”, “us” or “our” means Association for Real Change incorporated and registered in England and Wales under company number 01658354.

“you” or “your” means a user of the Service provided by us.

“Service” or “Services” means any of the Services offered by us.

“site(s)” means <https://www.dbsassist.co.uk/arc> and <https://www.arcuk.org.uk>

### Why we have a Privacy Policy

This policy (together with our terms and conditions and any other agreements or policies we may notify you of from time to time, together our “Terms”) applies to your use of any of the Services we may provide to you and sets out the basis on which personal data you provide us, or we collect from you, will be used and/or processed by us.

### Data protection public register details

For the purpose of the Data Protection Act 1998 (the “Act”) and the General Data Protection Regulation 2016, the data controller is Association for Real Change.

### Information we may collect from you

We may collect and process the following data about you:

#### Information you give us

- You may give us information about you by filling in forms on our sites or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our Services, sign up for any regular information services, undertake a check and when you report a problem with our sites or otherwise contact us. The information you give us may include your name, address, email address and phone number and financial and credit card information.
- You may, in addition, provide us with more additional personal information.

#### Information we collect about you

Each time you use our Service, we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect information about your visit, including the full Uniform Resource Locators (URL) Your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locations (URL) clickstream to, through and from our sites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call our customer service number.

### **Information we receive from other sources**

- We may receive information about you if you use a Service we, or an affiliate or group member, operate. We will inform you when we collect that data that it may be shared internally and combined with data collected by us. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- 

### **USES MADE OF THE INFORMATION**

We use the information held about you in the following ways:

#### **Information you give to us**

We will use this information:

- To carry out the checks when using our Services. We will use the information provided as part of the checks in accordance with the e-consent forms;
- To carry out system testing and system checking;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we may contact you by electronic means (e-mail or SMS) or in writing with information about goods and services similar to those of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please notify us at any time by giving written notice to Association for Real Change by emailing the following address: [disclosureservice@arcuk.org.uk](mailto:disclosureservice@arcuk.org.uk)
- To notify you about changes to our Service; and
- To ensure that content from our Service is provided in the most effective manner for you and other users.

#### **Information we collect about you**

We will use this information:

- To administer our Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our Service to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our Service, when you choose to do so;
- To ensure continued efforts to keep our Services safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our Services about goods or services that may interest you or them.

### **Information we receive from other sources**

- We may combine this information which you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive and the Services that we are providing).

## Disclosure of your information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. We may share your information with selected third parties including:

- Where you have applied for a check in accordance with the e-consent form that you have or will be required to complete;
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and other consultants that assist us in the improvement and optimisation of our Service;
- If we sell or buy any business or assets, in which case we will not disclose your personal data to the prospective seller or buyer of such business or assets;
- If the Association for Real Change is sold or substantially all of its assets in which case personal data held by it about its customers will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms; or to protect the rights, property, or safety of Association for Real Change our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We do not sell, trade or rent any personal information to others. We may use third party service providers to help us operate our business and this site or administer activities on our behalf, such as newsletters or surveys. We may share your information with these third parties for those limited purposes.

## Data Transfer and Storage

The data that we collect from you may be transferred to, and stored at a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA, who work for, or on behalf of us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of the Services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes. You can exercise your right to prevent such processing by contacting us at: [disclosureservice@arcuk.org.uk](mailto:disclosureservice@arcuk.org.uk)

## Withdrawal of consent

You may withdraw any consent that you have provided to us at any time by giving written notice to the Association for Real Change<sup>1</sup> by emailing the following address: [disclosureservice@arcuk.org.uk](mailto:disclosureservice@arcuk.org.uk)

## Opting out

At any time, you can opt out of our advertising, suggestions and recommendations in respect of our goods and Services. You can do this by contacting us at: [disclosureservice@arcuk.org.uk](mailto:disclosureservice@arcuk.org.uk)

## Access to your personal information

In line with Section 7 of the Act you may ask us at any time for information about any personal data we hold about you, or ask us to correct or delete that information with the exception of criminal data. The

Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

### **How we protect your data**

We adopt appropriate data collection, storage and processing practices and security measures to protect against un-authorised access, alteration and disclosure or destruction of your personal information, username, password, transactional information and data stored on our UK sites.

### **Back Up Policy**

We use XTS-AES-128 encryption with a 256-bit key for all personal data to ensure that it remains safe and secure. We also run a redundant mirrored database server to ensure complete data protection for us and all of our customers. All information held following the check will be securely destroyed when no longer required.

### **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and notified you by e-mail or during the use of the Services. Please check frequently to see any updates or changes to our privacy policy.

To read our Statement of Fair Processing, please refer to our website.

Signature: *Lisa Lenton / Martin Anderson*

Date: 01/09/2017