



The Jain Network Privacy Policy

Jain Network

Data Protection Officer

L Shah

Contact Details

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Privacy Policy Review Date

24.3.25

This policy be reviewed yearly, or when there is a change in our organisation, which directly impacts data privacy.

1. What is the purpose of this document?

The Jain Network (JN) is committed to protecting the privacy and security of your personal information.

This privacy policy ('**Privacy Policy**') describes how we collect and use personal information about you during and after your working, volunteering or supportive relationship with us in accordance with laws that regulate processing of your personal information (together, '**Data Protection Laws**'). This Privacy Policy applies to all prospective, current, and former staff, volunteers and supporters.

For the purposes of Data Protection Laws, JN acts as a "data controller" and means that we are responsible for deciding how we use personal information about you.

2. Data protection principles

We comply with Data Protection Law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to the purposes we have told you about.
- Accurate and kept up to date.
- Kept only for as long as necessary for the purposes we have told you about.
- Processed in a manner that ensures appropriate security of the personal information.

3. The type of information we hold about you

Personal information (which may also be called personal data), means any information about you from which you can be identified, whether directly or indirectly. We collect, store, and use the following categories of personal information about you:

Category	Data collected	What we use it for
All salaried staff volunteers and supporters.	Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.	To contact you about your working, volunteering and supporting the JN.
All salaried staff and volunteers.	Recruitment information (references and other information collected as part of the application process).	Making a decision about your recruitment as a member of staff or volunteer.
All salaried staff and volunteers.	Information about any criminal convictions and offences as part of the recruitment process.	Making a decision about your recruitment as a staff member or volunteer for the role you have applied for.

All salaried staff and volunteers.	Date of birth.	To ask for consent if the volunteer is under 18 (in circumstances where we are able to accept applications from under 18s).
All salaried staff and volunteers.	Emergency contact information.	To contact someone in case of emergency.
All salaried staff.	Performance information.	To provide a reference if requested.
All salaried staff and volunteers.	Information about your health, including any medical condition.	To comply with our health and safety obligations and enable any reasonable adjustments to be made.
Trustees	Name, title, address, telephone number, personal email address, date of birth.	Registers of Directors at UK Companies House and UK Charity Commission registration documents.
Some salaried staff, volunteers and supporters.	Photos and case studies.	If you consent, we will use your image and story to promote the work of the JN in different publications e.g. JN newsletters, JN website with local/national press or on JN social media platforms.

4. How is your personal information collected?

We collect personal information about you directly through the application and recruitment process. We may sometimes collect information from third parties, including former employers. We will also ask you directly for your personal information, particularly to contact you about your working, volunteering or supportive relationship with us.

We may collect additional personal information throughout the period of you working, volunteering or supporting the JN. For example, our volunteer information forms, our WhatsApp groups, email contact lists, our CCTV systems, social media platforms and website may also collect additional personal data about you.

Please ensure that any personal information you supply to us which relates to third party individuals, is provided to us with their knowledge. That they understand why you are giving us their personal information and how the JN will use their personal information.

5. The lawful grounds on which we use information about you

We may also use and share your personal information in the following situations, which are likely to be rare:

- **Contract** - Where we need to perform any contract with you, or in order to take any pre-contract steps made at your request;
- **By Law** - Where it is necessary for us to comply with a legal obligation;
- **Consent** - Where you have freely provided consent for particular purposes;
- **Legitimate Interest** - Where it is necessary for our legitimate interests (or those of a third party). In broad terms our legitimate interest is fulfilling the charitable purpose of the JN, which involves sending information to our staff, volunteers and supporters. Contacting our staff and volunteers to plan and administrate activities, taking steps to ensure and monitor compliance with our legal obligations and internal standards and procedures. This may include assessing suitability of staff and volunteers for potential roles and keeping records of volunteer activities and staff performance.
- We may also use your personal information in the following situations, which are likely to be rare:
 - Where we need to protect your interests (or someone else's interests), such as in a medical emergency.
 - Where it is needed in the public interest.

6. How we use particularly sensitive personal information

We may process 'special category' or 'sensitive' personal information, such as mental or physical health data. We will only do this with your explicit consent; in compliance with a legal obligation or, to protect your vital interests (or someone else's interests) when you are not capable of giving your consent; or, where you have already publicised such information; or, where we need to use such sensitive data in connection with a legal claim that we have or may be subject to.

In particular, with your consent, where it is needed to assess your working or volunteering capacity on health grounds, subject to appropriate confidentiality safeguards, we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work or volunteer and to provide appropriate adjustments, where possible.

7. Information about criminal convictions

We may need to check you against the national criminal conviction database by doing a Disclosure and Barring Service check where it is appropriate given the nature of a working or volunteering role and we are legally permitted to do so. If it is appropriate and legal, we may also collect this kind of information in the course of you working, volunteering or supporting us, but may also be provided to us directly by you or others.

We will use information about criminal convictions and offences in the following ways:

- To determine, without discrimination, your suitability for a working or volunteering role;
- To continue to ensure you are still suitable for a working or volunteering role, including by means of continual screenings, where appropriate.

We collect and process information about criminal convictions for the above purposes relying on one or more of the following lawful grounds: with your consent; to comply with a legal obligation; or, less commonly, to protect your vital interests (or someone else's interests) when you are not capable of giving your consent; or, where you have already publicised such information; or, where

we need to use such information in connection with a legal claim that we have or may be subject to.

Processing of information about criminal convictions will be in line with an appropriate policy and safeguards which we are required by law to maintain when processing such information.

8. If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure the health and safety of other JN staff, volunteers, visitors and supporters). This may mean that you will not be able to continue to volunteer with us, and we may have to undertake disciplinary action if you are a JN salaried member of staff.

9. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is related to the original purpose.

10. Data sharing

We may disclose your information in the following circumstances:

- To, suppliers or service providers where it's necessary to do so to facilitate your working, volunteering or supporting role. By way of example, we may disclose your email address to Google forms an online tool we use to gather information from our volunteers and supporters.
- Where we are legally obliged to, we will share the information of salaried staff, volunteers and supporters. We provide the Charity Commission and Companies House with basic contact details for our Trustees.
- For the purpose of providing a reference.
- If we share your data, we require third parties to respect the security of your data, use it only for lawful purposes and handle it in accordance with Data Protection legislation, adopted under English law.
- We will never sell or rent your information to third parties for marketing purposes.

11. Data security

We have put in place appropriate technical and organisational measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to salaried JN staff, volunteers, agents, contractors

and other third parties who have a business need to know.

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

12. Transferring information outside the EU

We may decide to use the data hosting or data processing services of a supplier or service provider who is based outside the UK and European Economic Area (EEA), which means that your personal information may be transferred to countries that are not considered to have the same standards for legal protection of personal information as the UK. We will always take steps to choose entities who respect data security and have, or will put, in place suitable legal safeguards to protect your personal information.

13. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal 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. Personal information that we no longer need will be securely destroyed.

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.

14. Your rights

You have the following legal rights in relation to our collection and processing of your personal information:

- **Right to be informed** – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on JN communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- **Right of access** – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information (and other related information). Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exceptions that apply. 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.
- **Right of erasure** – at your request we will delete your personal information from our records as far as we don't have a valid reason for holding on to it (e.g. to comply with a legal obligation).

- **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. Please keep us informed if your personal information changes during your working, volunteering or supportive relationship with us.
- **Right to restrict processing** – you have the right to ask us to restrict the processing of your personal information if there is disagreement about its accuracy or whether our use is legitimate or not.
- **Right to object** – you have the right to object to processing where we are: (i) processing your personal information on the basis of the legitimate interests ground and we have no compelling reason we can demonstrate to continue with that processing; (ii) using your personal information for direct marketing, or; (iii) using your personal information for statistical purposes.

If you wish to exercise any of these above rights, please contact the Jain Network Office info@jainnetwork.com. For more information about your rights or if you are not happy with our response to a request, you can contact the Information Commissioner’s Office (ICO) – for more details, see <https://ico.org.uk/>

15. Website cookies

The Jain Network website www.jainnetwork.com uses “cookies” for the functionality of the website.

16. Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee data protection standards at the JN. If you have any questions about this privacy notice or how we handle your personal information, please contact our DPO at info@jainnetwork.com

17. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with access to a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Privacy Policy, please contact info@jainnetwork.com