

# FRESH FUTURES

Improving lives, inspiring change

## Website Privacy Policy

At Fresh Futures we are committed to protecting the privacy and security of our service users and site visitors. Fresh Futures fully understand the importance of keeping your data secure and private.

This privacy notice therefore aims to be completely transparent about how we handle and use your personal data. Our Privacy Policy has been written to help you to understand how and why your personal information is collected at Fresh Futures and what rights you have available to that information.

For further information, please contact our Data Protection Officer using the contact details found in **Section 2** of this Policy.

### 1. Who we are and how you can contact us:

"Fresh Futures" (referred to in this policy as "we", "us" or "our") is a trading name of:

**Fresh Futures (NCC)**

Brian Jackson House  
New North Parade  
Huddersfield  
HD1 5JP

Registered Charity Number:	288125
Company number:	1763241
ICO Registration Number:	Z5459259

### 2. Our Data Protection Officer:

We have appointed a Data Protection Officer, who can be contacted in the following ways should you have any questions, complaints or feedback about your privacy:

**Mail:**

**Data Protection Officer**

FAO Katie Shephard and Bruce & Butler Limited  
Fresh Futures  
Brian Jackson House  
New North Parade  
Huddersfield  
HD1 5JP

**Email:**

dpo@freshfutures.org.uk

**Tel:** 01484 519988

### 3. Where we collect your personal data:

We collect your personal data in the following ways:

- Participation entry form;
- Self-referred form;
- When you subscribe to our Newsletter.
- Service assessment information;
- Completing service user progress forms;
- Completing service user exit forms;
- When you respond to a survey we have provided;
- When your image is captured on our CCTV systems;
- When completing attendance sheets;
- Your image captured when we take photographs;
- Schedules of work;
- Invoices (room bookings);
- Collecting card payments; and
- Completing and updating any accident/incident records.

### Data we are provided

Where applicable, Fresh Futures will collect information relating to yourself from a variety of organisations for current and potential service users. These include but are not limited to:

- The Police;
- NHS;
- Local Authorities; and
- Other relevant agencies (for instance Social Services and the Courts);

### 4. Data we collect about you:

We will collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Categories of personal information	Description
<b>Identity details</b>	Title, first name, middle names, last name, nickname, date of birth, signature, image, gender, national insurance number, reference number, registration number, language(s) spoken.
<b>Contact details</b>	Telephone number(s), email address(es), postal address(es), work address(es).

<b>Emergency Contact data</b>	Title, first name, middle names, last name, nickname, relationship to service user, current address, telephone number.
<b>Employment data</b>	Employment status, education information, hours worked.
<b>Criminal Offence data</b>	Information relating to criminal convictions and offences.
<b>Transaction data</b>	Details of the services you are paying for, including date and time of paying in relation to that transaction. We also process your card number, expiry date and CVV number.
<b>Technical data</b>	Cookies, IP Address
<b>Message details</b>	Information disclosed through communications or notes.
<b>Equal Opportunity data</b>	Ethnicity, Gender Identity, Sexual Orientation, Religious and Philosophical beliefs, health information.

We collect special categories of personal data about you, and these will be processed under our requirement for the management of health or social care systems. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation and information about your health.

We also collect information relating to criminal convictions that are currently being served or are outstanding and we have official authority to do this.

## 5. How we use your personal data:

We are only allowed to use personal data about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal data which we collect from you, how we use it, and the legal ground on which we rely when we use the personal data.

To maximise the protection of your identity, for certain processing activities, Fresh Futures will pseudonymise your personal information. Pseudonymisation is a technique to remove information that directly identifies an individual and replaces it with a reference point i.e., replacing a service user's name with an identification number.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate

interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below. We will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

What we use your personal information for	What personal information we collect	Our legal grounds for processing	Our legitimate interests (if applicable)
Subscribing to our newsletter.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>	N/A
Administering cookies onto the website user's device.	<ul style="list-style-type: none"> <li>• Technical data</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>	N/A
To sign you up to use any of our services.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Professional data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal obligation</li> </ul>	N/A
Service suitability assessments.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Professional data</li> <li>• Emergency contact data</li> <li>• Special category personal data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A
Recording your progression when using our services.	<ul style="list-style-type: none"> <li>• Identity data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A
To meet our targets and commitments to equality and diversity.	<ul style="list-style-type: none"> <li>• Equal Opportunity data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>	To meet the aims and commitments we have made and set out in our Equality Policy.
Termination of your engagement with our services	<ul style="list-style-type: none"> <li>• Identity data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A

Surveys and feedback questionnaire.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To help improve our service and for you to provide feedback to us.
When your image is captured on our CCTV systems.	<ul style="list-style-type: none"> <li>• Identity data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	To ensure the safety and security of assets, employees and service users.
Attendance sheets	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	N/A
Taking photographs for marketing purposes.	<ul style="list-style-type: none"> <li>• Identity data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Consent</li> </ul>	To show the work of our services in our marketing pieces for the website, magazines, and articles.
Publication of case studies through social media, online, leaflets and the press.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Special category data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>	To offer a first-hand insight into the benefits of services that Fresh Futures has to offer.
Mobile application (pseudonymised)	<ul style="list-style-type: none"> <li>• Identity data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>	To improve the current service and help ensure we meet our safeguarding requirements.
Video calling	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Technical data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A
Schedules of work	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> <li>• Professional data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A
Invoices (room bookings)	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal obligation</li> </ul>	N/A
For the procurement of card payments	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Transaction data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	N/A

from service users.			
Completing and updating accident/incident records.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	N/A
Referrals from various organisations for current and potential service users.	<ul style="list-style-type: none"> <li>• Identity data</li> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	N/A

## 6. Who we share your personal data with:

In order to provide you with our services and meet our legal obligations, we only share your data with third parties, in the following circumstances:

- To fulfil a service;
- To provide evidence to our funders of the services provided;
- To manage and monitor your relationship with us through our CRM;
- To administer the Fresh Futures services;
- To authorise debit/credit card payments;
- To improve our services;
- To meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations; and
- If Fresh Futures are acquired by a third party, personal data held by it, about its service users, will be one of the transferred assets.

If you use our Befriending Service, we may share your information with Age UK and Royal Voluntary Service (RVS). This is to ensure that we can fulfil the demand for the service within the befriending partnership. If your data is shared with Age UK or RVS and you would like to know more about how they process your personal information, please visit their website to access their privacy notice.

We'll never make your personal data available to anyone outside the Fresh Futures group for them to use for their own marketing purposes without your prior consent.

## 7. Transferring your personal information outside the EEA

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside the EEA, we have to tell you.

Limited personal information that we collect from you may be transferred to and processed in a destination outside of the EEA. In these circumstances, your personal information will only be transferred on one of the following bases:

- The country that we send the data is approved by the Information Commissioners Office as providing an adequate level of protection for personal data; or
- The recipient has agreed with us standard contractual clauses approved by the European Commission, obliging the recipient to safeguard the personal data; or
- The recipient has agreed Binding Corporate Rules (BCR's) approved by the European Commission, obliging the recipient to safeguard personal data; or

Purpose of Processing	3rd Party	Location	Safeguard
To process card payments	Stripe	USA	Standard Contractual Clauses - with IDTA addendum

To find out more about how your personal information is protected when it is transferred outside the EEA, please contact our Data Protection Officer using the details above. Before sharing any information with a third party, we will ensure that there is a data processing agreement in place requiring that the third party protects personal data according to the UK General Data Protection Regulation (UK GDPR).

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

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your personal data, we take into consideration:

- Any statutory or legal obligations;
- The requirements of the business;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

After such time, we will securely delete or destroy your personal data. In most instances the personal data processed by us this will be securely destroyed 6 years from when you cease to be a service user.

For email newsletters, we will retain email addresses for 2 years. After that, we will seek to re-obtain consent from individuals that have been inactive. If they do not re-consent, they will be securely deleted from the marketing database.

## **9. Your rights**

Under the UK GDPR, you have certain rights in relation to your personal data.

Everybody has rights relating to the collection and use of their personal information. These are the rights that apply to your personal information held within Fresh Futures.

### **Right to be Informed**

We will always be transparent in the way we use your personal data. You will be fully informed about the processing through relevant privacy notices.

### **Right to Access**

You have a right to request access to the personal data that we hold about you and this should be provided to you, under the UK GDPR and the Data Protection Act 2018, within 1 month. If you would like to request a copy of your personal data, please contact us using the details at the top of this policy.

### **Right to rectification**

We want to make sure that the personal data we hold about you is accurate and up to date. If any of your details are incorrect, please let us know and we will amend them.

### **Right to erasure**

You have the right to have your data 'erased' in the following situations:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed.
- When you withdraw consent.
- When you object to the processing and there is no overriding legitimate interest for continuing the processing.
- When the personal data was unlawfully processed.
- When the personal data has to be erased in order to comply with a legal obligation.

If you would like to request erasure of your personal data, please contact us using the details at the top of this policy. Please note that each request will be reviewed



on a case-by-case basis and where we have a lawful reason to retain the data, it may not be erased.

### **Right to restrict processing**

You have the right to restrict processing in certain situations such as:

- Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data.
- Where you have objected to processing and we are considering whether our legitimate grounds override your legitimate grounds.
- When processing is unlawful, and you oppose erasure and request restriction instead.
- Where we no longer need the personal data, but you require the data to establish, exercise or defend a legal claim.

### **Right to data portability**

You have the right to data portability in certain situations. You have the right to obtain and reuse your personal data for your own purposes via a machine-readable format, such as a .CSV file. If you would like to request portability of your personal data, please contact us. This only applies:

- To personal data that you have provided to us;
- Where the processing is based on your consent or for the performance of a contract; and
- When processing is carried out by automated means.

### **Right to object**

You have the right to object to the Fresh Futures processing your data in these circumstances:

- Where the processing is for direct marketing. Remember you can opt out of email communication at any time via the unsubscribe feature on our emails;
- Where the processing is based on legitimate interests; or
- Where the processing is for purposes of scientific/historical research and statistics.

## **10. Not Happy?**

Please let us know if you are unhappy with how we have used your personal data by contacting the Data Protection Officer (details can be found in **Section 2** of this Policy).

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at [www.ico.org.uk](http://www.ico.org.uk). We would be grateful for the chance to

deal with your concerns before you approach the ICO so please contact us in the first instance.

## 11. Updates to this Privacy Policy

We may update this Privacy Policy at any time, and we will provide you with 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 in relation to this policy, please contact our DPO.

Document version	Date	Revised by	Approved by	Comments
1.0	01/2020	Bruce & Butler - DPO	Rob Edden	New policy adopted
2.0	01/2023	Bruce & Butler - DPO	Rob Edden	Policy update
3.0	01/2024	Bruce & Butler - DPO	Shaista Ahmed	Policy update
4.0	06/2025	Bruce & Butler - DPO	Katie Shephard	Policy update
5.0	09/2025	Bruce & Butler - DPO	Katie Shephard	Policy update