



Coram Adoption Website and Newsletter Privacy Policy - September 2021

Online Privacy Overview

Your personal data is protected by UK and EU legislation, specifically the EU General Data Protection Regulation 2016/679 (the 'GDPR'), the Privacy and Electronic Communications (EC Directive) 2003 and the Adoption and Children Act 2002 (ACA). We aim to exceed our legal obligations by following best practice and reviewing our procedures regularly.

Coram is registered as a data controller with the Information Commissioner for the United Kingdom for those purposes for which personal information is collected on this website.

Your use of our website is also governed by our website Terms & Conditions and use of other Coram services is governed by any applicable terms as well as the overall Coram Group Privacy Policy.

What information does Coram collect about me and how is it obtained?

You may at times be asked to supply personal information via the Coram Adoption website. Personal information is anything that enables us to identify you in some way, such as your name and email address. For instance, we may collect personal information from you when you complete online forms as part of communicating with us, when you subscribe to our email updates, or otherwise provide us with personal information. Coram will only collect personal information when you specifically and knowingly provide it.

If you supply such information, we are legally bound by the Data Protection Act 1998 to ensure that such information is only used for the purpose for which it was requested and also to ensure that the data is held securely.

Why does Coram collect my personal information?

We collect and use your personal data for the following purposes:

- To facilitate your adoption enquiry;
- To provide you with the information, products or services you have requested;
- Subject to approval, in the family finding process in partnership with Local Authorities;
- To further our charitable aims or to help inform the adoption practices and support we offer;
- To keep you updated with relevant workshops, conferences and/or training sessions and the annual newsletter.

If you have subscribed to our adoption e-newsletter, you can opt out of receiving it at any time – either by clicking the unsubscribe link in the newsletter itself, or by emailing us at marketing@coram.org.uk. This will not affect contact regarding the delivery of services or ongoing adoption enquiries with Coram.

How does Coram process my personal data?

Coram complies with its obligations under the GDPR and Data Protection Law by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive

amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Coram complies with the Adoption Agencies Regulations 2005 part 7, regulation 40. 'an adoption agency must keep the child's case record and the prospective adopter's case record for such period as it considers appropriate'.

How secure is the information which I submit on the Coram Adoption website?

Coram takes the care of your data seriously and undertakes to protect your personal information in a range of ways.

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. These measures include the use of secure servers, firewalls and SSL encryption.

However, please be aware that the transmission of information over the Internet is never 100% secure so, while we strive to protect your personal information, we can't guarantee the security of any information you submit to us via our website.

How does the Coram Adoption website use 'Cookies'?

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to make sure that the site reflects your needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Find out more about how Coram uses Cookies.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you want to prevent our cookies being stored on your computer in future, you may do so by referring to your internet browser's instructions. You can do this by clicking on the "Help" menu. Please note, however, that if you disable our cookies you may not be able to access certain services or facilities on our site and your use of our site may be restricted. Further information on deleting or controlling cookies is available at www.aboutcookies.org.

What about links to other websites?

Coram Adoption's website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information

which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Does Coram share my information with anyone else?

Coram Adoption will not sell, distribute or lease your personal information to third parties unless we have your permission or are required to do so by law.

What is the legal basis for processing my data?

Article 6 of the GDPR:

- Consent of the data subject;
- Processing if necessary for the performance of a contract with the data subject or to take steps to enter into a contract;
- Processing is necessary for compliance with a legal obligation under the Adoption Agencies Regulations 2005;
- Processing is necessary to protect the vital interests of a data subject or another person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by interests, rights or freedoms of the data subject.
- Processing is necessary for the reasons of public interest in the area of the looked after children population.

How long will you keep my data?

We will retain your email address to facilitate your interest in adoption via our free email updates for a period of 3 years from the date you subscribed. After this time, your updates will automatically lapse unless you take action to re-subscribe.

If you cease to have an active relationship with us or request to receive no further contact, we may retain some basic information in order to avoid sending you unwanted materials in the future, and to ensure that we don't accidentally duplicate information.

Will you share my personal data?

Your personal data will be treated as strictly confidential, and generally will only be accessible by staff members within Coram's adoption service. However, sometimes Coram uses third parties to process your information on our behalf, for example, information submitted online may be accessible by our website developer (Fat Beehive). Where we use external companies to collect or process personal data on our behalf we do comprehensive checks before we work with them, and put agreements in place that set out our expectations and requirements, especially regarding how they manage the personal data they process on our behalf. We have a robust partner monitoring framework to ensure these contractual obligations are met.

You are able to register with external websites of third parties associated with adoption, for example Link Maker, Adoption UK, Adoption Voice and Adoption Match. Coram is not responsible for any data held by these organisations.

Apart from as outlined in this notice, we will only share your data with third parties outside of the organisation with your consent or where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies).

Your rights and your personal data

Unless subject to an exemption (under the GDPR), you will have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Coram holds about you;
- The right to request that Coram corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Coram to retain such data;
- The right to request that the data controller (Coram) provide the data subject (you) with your personal data and where possible, to transmit that data directly to another data controller (the right to data portability), where applicable.
- The right to lodge a complaint with the Information Commissioners Office.

Further Processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

How can I access the information that Coram Adoption holds about me?

You have the right to ask for a copy of the information we hold about you (for which we may charge a small fee) and to have any inaccuracies in your information corrected. If you wish to exercise these rights, please write to:

Post: Coram Privacy Officer, 41 Brunswick Square, London, WC1N 1AZ.

Email: dataprotection@coram.org.uk

We aim to issue an initial response to all enquiries within five working days, and will offer a full response to all information access requests within forty working days of receipt. It will help us locate your records more easily if you can tell us something about the nature of your contact with Coram Adoption.

How can I make changes to the information that Coram Adoption holds about me?

If your personal details change, please help us to keep your information up to date by notifying us at the above address. It will help us to update your information quickly if you include your full name and address and/or supporter number (if known), together with details of the correction to be made.

What if I want to limit or stop receiving messages from Coram Adoption?

If you wish to receive no further information from us, at any point in time, this can be done via the above postal or email address.

You may choose to restrict the collection or use of your personal information by following the opt-out instructions on any online form or email you might receive from us or by emailing adoption@coram.org.uk or calling us on 020 7520 0330. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time.

Your consent

By providing us with your personal information you consent to the collection and use of that information for the purposes and in the manner described in this Privacy Policy. Coram reserves the right to modify or amend this privacy statement. Any alterations to our policy on the collection or use of data will be posted on this website. The latest version will be available on this website so please check periodically. By continuing to use this website you will be deemed to have accepted any changes.

Last updated: September 2021