



**Talking News Federation**

## **TNF Data Handling & Privacy Policy**

**TALKING NEWS FEDERATION**

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**Telephone: 01793 485 554**

**Registered Charity No: 1185913**

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## 1. Introduction

We are the Talking News Federation (TNF) and this policy details how we receive, process and store your data.

This policy is deliberately written in plain English and words are used in their conventional meanings.

Our general data policy is to hold at any time only the absolute minimum we require to effectively perform our charitable aims. We keep as few copies as possible in as few places as possible whilst striving to ensure that no data record is stored only in one location for the purposes of business continuity.

Data is shared internally only to those who have an explicit need for it to perform their specific role and, aside from statutory obligations, and the specific areas covered below we do not share data with outside or third-party organisations.

We hold data for four categories of people and organisations. We process this information as explained below.

## 2. Processing

For each of the four categories below, the types of data we collect, store and process are set out in the matching appendix at the end of this document.

In all cases, access is, as far as technically possible, restricted to those volunteers and staff who need access for their role.

## 3. Categories

### 3.1 Category A: Volunteers

We use the data we store about volunteers for the following purposes:

- Specifically for trustees, to fulfil our reporting obligations to the Charity Commission. We do this under **GDPR Article 6(1)(c) Legal obligation**.
- Updating volunteers with information we are required to provide (such as this policy). We do this under **GDPR Article 6(1)(c) Legal obligation**.
- To contact volunteers with requests for work to be undertaken. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because it is our legitimate interest that volunteers are provided with the necessary communication to do the tasks for which they volunteered.

- Providing details of events, workshops, social events which we may from time to time organise. We do this under **GDPR Article 6(1)(a) Consent**.

### 3.2 Category B: Member organisations

Member organisations are almost always entities in their own right (and thus often outside the influence of most data protection legislation). However, TNF are aware that many of the addresses, email addresses and telephone numbers that member organisations provide are those of officers within those organisations. Because these data belong to individuals, we endeavour wherever possible to treat organisations' data in the same way and to the same standards as we treat that of individuals.

We use the data we store about member organisations for the following purposes:

- Updating members with information we are required to provide (such as this policy). We do this under **GDPR Article 6(1)(c) Legal obligation**.
- Providing details of events, workshops, social events which we may from time to time organise. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because we believe this information is sufficiently important to warrant its communication.
- Providing information from selected third parties which we believe may impact or benefit member organisations or their operations. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because we believe the information being sent is sufficiently important to warrant its communication.
- Whilst we use legitimate interest as our legal basis for this processing, members are free to opt-out of all such communications should they choose to do so, but they acknowledge that they do so at their own risk of missing important information.

### 3.3 Category C: Officers, employees & volunteers of member organisations

We use the data we store about officers, employees and volunteers of member organisations for the following purposes:

- Updating members with information we are required to provide (such as this policy). We do this under **GDPR Article 6(1)(c) Legal obligation**.
- To provide access to the members' area of the TNF website. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because we believe the information contained in that part of the site is the primary reason for most people registering their data with us.

- Providing details of events, workshops, social events which we may from time to time organise. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because we believe the information being sent is sufficiently important to warrant its communication.
- Providing information from selected third parties which believe may impact or benefit member organisations or their operations. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because we believe the information being sent is sufficiently important to warrant its communication.

Whilst we use the legitimate interest as our legal basis for this processing, members are free to opt-out of all such communications should they choose to do so, but they acknowledge that they do so at their own risk of missing important information.

### 3.4 Category D: Suppliers & affiliate bodies

Suppliers and affiliate bodies are almost always entities in their own right (and thus often outside the influence of most data protection legislation). However, TNF are aware that some of the addresses, email addresses and telephone numbers that those bodies provide are those of people within those organisations. Because these data belong to individuals, we endeavour, wherever possible, to treat organisations' data in the same way and to the same standards as we treat that of individuals.

We use the data we store about suppliers and affiliate bodies for the following purposes:

- Updates and information we are required to provide (such as this policy). We do this under **GDPR Article 6(1)(c) Legal obligation**.
- To contact suppliers with requests for work to be undertaken or products to be supplied. We do this under **GDPR Article 6(1)(f) Legitimate Interests** because it is our legitimate interest that suppliers are provided with the necessary communication to fulfil the service they have offered.
- Providing details of events, workshops, social events which we may from time to time organise. We do this under **GDPR Article 6(1)(a) Consent**.

## 4. Data collection

We collect a variety of data (set out in the appropriate appendices below) from a variety of sources:

## 4.1 Data given to us by you or your organisation

Almost all the data we hold is given to us either by you directly, or by the member organisation for whom you work or volunteer. Information supplied by you could have come from any of the following sources:

- A form filled in at an event requesting to join a mailing list.
- Completing a membership form.
- Booking a place on an event.
- Making a donation.
- Contacting us by post, email or telephone.

Information supplied by an organisation with whom you work, or volunteer, could have come from any of the following sources:

- Membership request or renewal form, where you have been nominated as a contact.
- Event booking where you have been nominated as an attendee.
- Request to create a user account on one of our websites.
- Request to add an extra contact to our mailing lists.

### 4.1.1 Data received from third parties

From time to time, we may seek data from third parties, such as the Charity Commission, or the websites of member organisations. We may use this data to update our records, or to contact you where we are unable to do so by other means. We may store details of suppliers which we have sourced from third party sources, such as Google, your website, trade directories, etc.

### 4.1.2 Data collected automatically

Some data may be collected automatically. For example, if you visit one of our websites, there may be a log of that visit. More details can be found in the Websites section below.

## 4.2 Data sharing

### i. Administrative Processing

TNF contract out certain administration and office tasks to Sheffield Royal Society for the Blind (<https://srsb.org.uk/>) and so members of staff there can see your data as if they were administrative volunteers at TNF. We have a reciprocal data handling contract with SRSB which

prevents them using your data or our systems for any purpose other than those for which they are contracted by us.

## **ii. Audio transcoding**

If you supply us with audio recordings then these may be sent to our audio transcoding partner, Transloadit (<https://transloadit.com/>) along with your username so that the resultant output can be identified. Transloadit see no other information but may have access to any meta-data encoded within the file.

## **iii. Donations and payments**

If you donate through our website(s), that donation is processed by Charities Aid Foundation (<https://cafonline.org/>)

If you donate by SMS, that donation is processed by Donr (<https://donr.com/>)

If you make a payment to us by cheque or electronic transfer, that payment is processed by the bank to which you make the payment. Most likely NatWest (<https://natwest.com/>)

If you make a payment with a card through our website(s), that payment is processed by Stripe (<https://stripe.com/>)

## **iv. Cloud Storage**

We use Microsoft 365 (<https://microsoft.com/>) for our office functions and as such emails, documents, completed forms may be stored in Microsoft data centres.

Our main database, websites, and enquiry management tool are all hosted by Kualo Ltd (<https://kualo.com/>).

Video recordings of events and workshops are stored on YouTube (<https://youtube.com/>) and whilst these are hidden from normal searches they are playable by anyone who has the link.

Our audio archive and audio files used for the telephone listening servicer are hosted by Vultr (<https://vultr.com/>)

Staff at all these companies may, from time to time as necessary, access the servers on which that data is held for the purposes of maintenance and updates etc.

## **4.3 Data retention**

Unless a specific data retention period is required or permitted by law, we will only hold your data for as long as is necessary to fulfil the purposes outlined in the Processing section above.

The TNF Archive Policy sets out details of what data we retain and why. Even if we delete your data from our live systems, it may persist in backups, or on archival media for legal, tax or regulatory purposes.

Sometimes your data is part of a larger document which may be retained or archived due to other information it contains. In this case your data may be part of that archive.

#### 4.4 Your rights

Data protection legislation grants you certain rights to access, correct or erase your data along with certain rights to object to, or restrict what we can do with it.

To make enquiries about, to exercise any of your rights in law, or to withdraw your consent to the processing of your data (where consent is our legal basis), please contact us at [enquiries@tnf.org.uk](mailto:enquiries@tnf.org.uk)

If you are not satisfied with the way a complaint you make in relation to your data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>

It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during the period which we hold it.

#### 4.5 Changes of ownership and control

TNF may, from time to time, expand or reduce our organisation and this may involve the sale and/or transfer of control of all or part of the organisation. Where data is relevant to any part of our organisation so transferred, it will be transferred along with that part. The new owner or controlling party will, under the terms of this privacy policy, be permitted to use that data for the purposes for which it was originally supplied to us.

We may also disclose data to a prospective purchaser or controlling party. In all these instances, we will take all reasonable steps to ensure your privacy is protected.

#### 4.6 Websites

TNF operates a number of websites, and this policy applies to all of those and all sub-domains thereof:

- <https://tnf.org.uk/>
- <https://tnfsoundings.org.uk/>
- <https://talkinfo.org.uk/> & <https://talkinginfo.org.uk/>
- <https://sitc.tnf.org.uk/>
- <https://tntalk.org.uk/>
- <https://tnfkink.uk/>

- <https://talkingnewsfederation.org.uk/>
- <https://talkingnewsfederation.co.uk/>
- <https://talkingnewsfederation.com/>

## 4.7 Logs

Our internet hosting providers, Kualo Ltd (<https://kualo.com/>) and Vultr (<https://vultr.com/>) retain visitor access logs to which we also have access. None of these logs contain sufficient information for us to identify a specific individual. They follow an industry standard format and contain date, time, IP address, browser type, page requested and details of the whether the page was successfully delivered.

## 5. Cookies

Below is a list of the types of cookies that we use. All the cookies are strictly necessary for the safe and secure use of the websites.

Description	Purpose
Session Cookies	We use session cookies to remember you and maintain your session whilst you are logged in to your website(s).
Accessibility Cookies	We use these to remember your accessibility preferences.

## 6. Embedded content from other websites

Articles on our websites may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content. This may include tracking your interaction with the embedded content if you have an account and are logged in to that website.

## 7. Links to other websites

Our websites provide links to a variety of other websites. We have no control over these websites and are not responsible for the content of these



websites. This policy does not extend to your use of those websites and you are advised to consult their privacy policy prior to using them.

## 8. Telephony

Our telephony provider, Andrews & Arnold Ltd (<https://aa.net.uk/>), keep, and provide to us, logs of who we have called and who has called us.

Similarly, SRSB's telephony provider may do the same.

If you leave us a message on our answering machine, that recording will be made electronically and stored within our enquiry management system.

If you call the telephone listening service we will record your number for the purpose of remembering where you were. This service stores only the calling telephone number, date, time, publication, and track reached. You can prevent this happening by withholding your telephone number, but this will stop the bookmark feature from working.

## 9. Policy Changes

TNF reserves the right to change this privacy policy as we deem necessary from time to time, or as required by law, changes to the way we operate or the deployment of new technologies. Any changes will be immediately posted on our website (<https://tnf.org.uk/>).

TNF Data Handling & Privacy Policy drafted by Gavin Smalley & Alex Aucutt  
For, January 2024  
Reviewed by Heather Bolton, January 2024

## APPENDICES

### Category A: Data held for volunteers and trustees

- **Essential Data**
- Name
- Postal Address
- Primary Contact Email Address
- Primary Contact Telephone Number
- Billing Email
- Preferred Payment Method
- Payment Reference (set by us)
- Any access or dietary requirements (only if you have attended an in-person event)
- **Membership Data**
- For those who are paying individual or honorary members:
- Membership Type
- Start Date
- End Date
- Each returned membership form
- **Financial Data**
- For each transaction we store:
- Date
- Payment Type
- Reason
- Method
- Amount
- Whether the payment was made by someone else, and if so who
- **Event Data**
- For events where the organisation is the registered attendee, we store:
- Date
- Event Details
- Booking Forms
- **Enquiry Data**
- For each enquiry received after 1st November 2022 we store in a separate system:
- Name of enquirer
- Email address of enquirer (where known)
- Telephone number of enquirer (where known)
- Organisation of enquirer (where known)
- Nature of enquiry
- Detail of enquiry

- Each timestamped reply
- A log of the enquiry's progress through our system
- Notes about the enquiry that we have exchanged internally.
- **Other Data**
- In our member database we record each email sent by the database system, whether it be transactional or from our mailing list. Each one contains:
  - Date
  - Address in use at the time the message was sent
  - Subject
  - Message
  - Open Events (sometimes)
  - Click Through Events (sometimes)
- **Historical/Archive Data**
- Online we store from our old database:
  - Notes (including the dates and descriptions of previous emails sent, though not the actual emails)
  - Membership dates and years active
- In printed form we store:
  - Older returned membership forms (only for individual paying members)
  - Any letters that have been sent to us
  - Older booking forms sent by post
  - Any other information that you have sent to us.

### Category B: Data held for member organisations

- **Essential Data**
- Name (this may belong to a private individual)
- Registered Address (this may belong to a private individual)
- Primary Contact Email Address (this may belong to a private individual)
- Primary Contact Telephone Number (this may belong to a private individual)
- Billing Email (this may belong to a private individual)
- Preferred Payment Method
- Payment Reference (set by us)
- **Public Data**
- Public Contact Name (this may belong to a private individual)
- Public Contact Telephone Number (this may belong to a private individual)
- Public Contact Email Address (this may belong to a private individual)
- Website
- [Social Media Sites]
- Postcode of centre of operation

- [Towns Served]
- Organisation Summary
- Publications Read From
- Distribution Methods
- Distribution Frequency
- **Statistical Data**
- Formation Date
- Status
- Number of Volunteers
- Number of Listeners
- **Membership Data**
- Membership Type
- Start Date
- End Date
- Each returned membership form
- **Financial Data**
- For each transaction we store:
- Date
- Payment Type
- Reason
- Method
- Amount
- Whether the payment was made by someone else, and if so who
- **Event Data**
- For events where the organisation is the registered attendee, we store:
- Date
- Event Details
- Any access or dietary requirements
- Booking Forms
- **Enquiry Data**
- For each enquiry received after 1st November 2022 we store in a separate system:
- Name of enquirer (this may belong to a private individual)
- Email address of enquirer (where known) (this may belong to a private individual)
- Telephone number of enquirer (where known) (this may belong to a private individual)
- Organisation of enquirer (where known)
- Nature of enquiry (this may contain data about a private individual)
- Detail of enquiry
- Each timestamped reply

- A log of the enquiry's progress through our system
- Notes about the enquiry that we have exchanged internally.
- **Other Data**
- In our member database we record each email sent by the database system, whether it be transactional or from our mailing list. Each one contains:
  - Date
  - Address in use at the time the message was sent
  - Subject
  - Message
  - Open Events (sometimes)
  - Click Through Events (sometimes)
- **Historical/Archive Data**
- Online we store from our old database:
  - Last known primary contact name
  - Notes (including the dates and descriptions of previous emails sent, though not the actual emails)
  - Membership dates and years active
- In printed form we store:
  - Older returned membership forms
  - Any letters that have been sent to us
  - Older booking forms sent by post
  - Any other information that you have sent to us (this may include copies of constitutions, histories, leaflets, posters and a variety of other documents).

### **Category C: Data held for officers, employees & volunteers of member organisations**

- **Essential Data**
- Name
- Registered Address (only for individual paying members)
- Primary Contact Email Address
- Primary Contact Telephone Number
- Billing Email
- Preferred Payment Method
- Payment Reference (set by us)
- Any access or dietary requirements (only if you have attended an in-person event)
- **Membership Data**
- For those who are paying individual or honorary members:
  - Membership Type
  - Start Date

- End Date
- Each returned membership form
- **Financial Data**
- For each transaction we store:
  - Date
  - Payment Type
  - Reason
  - Method
  - Amount
  - Whether the payment was made by someone else, and if so who
- **Event Data**
- For events where the organisation is the registered attendee, we store:
  - Date
  - Event Details
  - Booking Forms
- **Enquiry Data**
- For each enquiry received after 1st November 2022 we store in a separate system:
  - Name of enquirer
  - Email address of enquirer (where known)
  - Telephone number of enquirer (where known)
  - Organisation of enquirer (where known)
  - Nature of enquiry
  - Detail of enquiry
  - Each timestamped reply
  - A log of the enquiry's progress through our system
  - Notes about the enquiry that we have exchanged internally.
- **Other Data**
- In our members database we record each email sent by the database system, whether it be transactional or from our mailing list. Each one contains:
  - Date
  - Address in use at the time the message was sent
  - Subject
  - Message
  - Open Events (sometimes)
  - Click Through Events (sometimes)
- **Historical/Archive Data**
- Online we store from our old database:
  - Notes (including the dates and descriptions of previous emails sent, though not the actual emails)

- Membership dates and years active
- In printed form we store:
- Older returned membership forms (only for individual paying members)
- Any letters that have been sent to us
- Older booking forms sent by post
- Any other information that you have sent to us.

### Category D: Data held for suppliers & affiliate bodies

- **Essential Data**
- Name (this may belong to a private individual)
- Registered Address (this may belong to a private individual)
- Primary Contact Email Address (this may belong to a private individual)
- Primary Contact Telephone Number (this may belong to a private individual)
- Billing Email (this may belong to a private individual)
- Preferred Payment Method
- Payment Reference (set by us)
- Any access or dietary requirements (only if you have attended an in-person event)
- **Membership Data**
- If the person or organisation is a member, then we also store:
- Membership Type
- Start Date
- End Date
- Each returned membership form
- **Financial Data**
- For each transaction we store:
- Date
- Payment Type
- Reason
- Method
- Amount
- Whether the payment was made by someone else, and if so who
- **Event Data**
- For events where the organisation is the registered attendee, we store:
- Date
- Event Details
- Any access or dietary requirements
- Booking Forms
- **Enquiry Data**
- For each enquiry received after 1st November 2022 we store in a separate system:

- Name of enquirer (this may belong to a private individual)
- Email address of enquirer (where known) (this may belong to a private individual)
- Telephone number of enquirer (where known) (this may belong to a private individual)
- Organisation of enquirer (where known)
- Nature of enquiry (this may contain data about a private individual)
- Detail of enquiry
- Each timestamped reply
- A log of the enquiry's progress through our system
- Notes about the enquiry that we have exchanged internally.
- **Other Data**
- In our member database we record each email sent by the database system, whether it be transactional or from our mailing list. Each one contains:
  - Date
  - Address in use at the time the message was sent
  - Subject
  - Message
  - Open Events (sometimes)
  - Click Through Events (sometimes)
- **Historical/Archive Data**
- Online we store from our old database:
  - Last known primary contact name
  - Notes (including the dates and descriptions of previous emails sent, though not the actual emails)
  - Membership dates and years active
- In printed form we store:
  - Older returned membership forms
  - Any letters that have been sent to us
  - Older booking forms sent by post
  - Any other information that you have sent to us (this may include copies of constitutions, histories, leaflets, posters and a variety of other documents).

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