

# **YFR LTD – PRIVACY AND DATA PROTECTION POLICY**

## **Version 3.0 – Last Updated: June 2025**

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### **1. Introduction**

YFR Ltd (“YFR”, “we”, “our”, or “us”) is committed to protecting your personal data and respecting your privacy. This Privacy and Data Protection Policy explains how we collect, use, share, and protect your personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

#### **Company Information**

YFR Ltd is registered in England and Wales (Company Number: 06874048).

**Registered Office:** 1 Station Road, Amersham, HP7 0BQ

**Email:** info@yfr.co.uk

**Phone:** 01753 628 400

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### **2. What Personal Data We Collect**

Depending on your relationship with us (e.g. supporter, donor, employee, contractor, applicant, or partner), we may collect the following:

#### **A. Identity and Contact Data**

- Name, title, address, email, telephone, date of birth

#### **B. Financial Data**

- Bank account details (for payments or payroll)
- Donation or transaction history

#### **C. Technical and Usage Data**

- IP address, login information, browser type/version
- Time zone settings, device IDs, website usage data

#### **D. Marketing and Communications Data**

- Preferences for receiving communications
- Feedback, survey responses

#### **E. Employment/Contractual Data (only if applicable)**

- CVs, references, right-to-work documents, tax data

We do not collect special category (sensitive) data unless required by law (e.g. diversity monitoring) and with your explicit consent.

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### 3. How We Collect Your Data

Your personal data is collected in a number of ways:

- Directly from you (e.g. via forms, applications, communications)
- Automatically through your use of our website or systems
- From third parties (e.g. recruitment platforms, partner charities)

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### 4. Legal Basis for Processing

We rely on the following lawful bases:

- **Consent** – when you explicitly opt in
- **Contractual necessity** – to fulfil a contract
- **Legal obligation** – to comply with UK law
- **Legitimate interests** – where our interests are not overridden by your rights (e.g. fundraising, donor analytics)

You can withdraw your consent at any time by contacting us.

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### 5. How We Use Your Data

We use personal data to:

- Register and manage supporters, donors, employees, and contractors
- Process payments and donations
- Respond to enquiries or complaints
- Send marketing or service updates (if opted-in)
- Improve and develop our services
- Monitor website performance and detect fraud

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### 6. Sharing Your Personal Data

We may share your data with:

- Service providers acting on our behalf (e.g. IT, CRM, payroll)
- Professional advisers (e.g. accountants, solicitors)
- Regulatory bodies or law enforcement (where legally required)
- Partner charities, only with your consent

All third-party processors are contractually obligated to ensure confidentiality and data security.

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## 7. International Transfers

If personal data is transferred outside the UK:

- We ensure the destination country has adequate protection (e.g. UK “adequacy” status)
- OR we implement safeguards (e.g. Standard Contractual Clauses)

We do not permit international transfers without protection measures.

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## 8. Data Retention

We retain your personal data only as long as necessary:

- Supporter/donor/contact data: up to 6 years after last interaction
- Employment-related data: up to 6 years post-employment
- Financial records: minimum 6 years (legal requirement)
- CVs or job applications (unsuccessful): up to 12 months unless requested otherwise

We may anonymise your data for research or statistical purposes.

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## 9. Data Security

We implement a range of security measures:

- Encrypted storage and transmission
- Access controls and multi-factor authentication
- Regular audits and staff training
- Strict internal policies for handling data

In the event of a data breach, we will notify you and the ICO as required by law.

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## 10. Your Rights

You have rights under data protection law, including:

- **Access** – request a copy of your personal data
- **Rectification** – correct inaccurate or incomplete data

- **Erasure** – request deletion of your data (“right to be forgotten”)
- **Restriction** – limit processing in certain circumstances
- **Objection** – stop processing based on legitimate interests or direct marketing
- **Data Portability** – request transfer of your data to another provider
- **Withdraw Consent** – at any time if processing was based on consent

To exercise these rights, contact us at [dpo@yfr.co.uk](mailto:dpo@yfr.co.uk). We will respond within 30 days unless an extension is justified.

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## 11. Cookies and Analytics

We use cookies to:

- Enhance website functionality
- Track usage patterns and improve user experience
- Serve relevant content and ads

You can manage cookies through your browser settings. For more details, see our separate [Cookie Policy].

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## 12. Changes to This Policy

We may update this policy from time to time. The latest version will always be available on our website. Where changes are significant, we will notify you.

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## 13. Contact & Complaints

Questions, concerns, or requests should be directed to:

**YFR Ltd – Data Protection Officer**

1 Station Road, Amersham, HP7 0BQ

Tel: 01753 628 400

Email: [info@yfr.co.uk](mailto:info@yfr.co.uk)

You also have the right to lodge a complaint with:

**Information Commissioner’s Office (ICO)**

[www.ico.org.uk](http://www.ico.org.uk)