

Privacy Policy: Rosie - The Rose Voucher Scanning App for Traders



Policy Date: 5th February 25

Review Date: 5th February 26

This Privacy Policy describes how Alexandra Rose Charity collects (referred to here as "ARC" or "we") collects and processes your personal data in relation to the Rose Vouchers Recording System for Traders (hereby referred to as 'Rosie'). Rosie is a Progressive Web Application (PWA) – for more information about how PWAs work more generally, please see [here](#).

Rosie is owned by Alexandra Rose Charity, whose registered office is Community Base, 113 Queens Road, Brighton, BN1 3XG. ARC is registered with the Charity Commission for England & Wales – Charity Number 211535 and The Scottish Charitable Incorporated Organisation Charity Number SC052479.

What is Rosie? Both ARC and Traders uses Rosie to log and record a Rose Voucher (defined below) submitted by a Recipient (defined below) and to request appropriate reimbursement from ARC. Rosie has the following four user-categories (all defined below): Trader, Users, Admin and System Administrators.

ARC takes your privacy very seriously. The policies and procedures we have in place are to protect the integrity and confidentiality of personal data and to comply with data protection legislation, including the UK General Data Protection Regulation (UK GDPR). If you have any questions about how we use personal data or about this Privacy Policy, please email info@alexandrarose.org.uk

Definitions

Administrators means personnel from ARC and its technology partners who will support Rosie.

Personal data means any information relating to an identified or identifiable natural person who can be identified directly or indirectly, in particular by reference to an identifier such as name, identification number, location data or an online identifier.

Rose Voucher Project means the ARC led project whereby Recipients receive Rose Vouchers which they can exchange at certain Trader locations in exchange for fresh fruit and vegetables. The project operates across locations within the UK and includes (i) an early years programme to supply fresh fruit and vegetables to families with young children, (ii) a fruit and vegetable prescription programme for adults with diet health-related conditions and (iii) bridging the gap which provides organic fruit and Veg at a subsidised cost.

Rose Vouchers are the vouchers which Recipients receive and exchange for fruit and vegetables from Traders.

Recipients means the parents or nominated care giver who receives the Rose Vouchers for their children and/or individuals participating in the Fruit & Veg on Prescription Project.

System Administrators means personnel from technology services that maintain our data servers.

Trader means the people or organisations which operate a local market stall or retail outlets and who has signed up to accept Rose Vouchers from Recipients in exchange for fresh fruit and vegetables. It includes any personnel of the trader who is authorised to log in and have access to Rosie.

This Privacy Policy sits alongside our Trader Terms of Use which are provided to Traders when they sign up to be part of the Rose Vouchers Project.

What personal data do we collect and why?

ARC needs to collect certain personal data so that Traders can be part of the Rose Vouchers Project and so that Traders can access Rosie to request reimbursement for Rose Vouchers. This information is necessary to form a contract and is listed below:

- Stall licensee name and responsible person
- Market name
- Mobile number
- Email address
- Company/shop/stall name
- Bank account name
- Bank account number
- Bank account sort code
- Bank reference

Providing this personal data means that ARC and its technology partners (including Administrators and System Administrator Personnel) can effectively manage and develop Rosie and keep Traders up-to-date with useful reminders and notifications. Providing an email address also means that Traders have a means of resetting their password. Personal financial information, such as bank account details are not gathered or stored in Rosie.

Retention of personal data

All personal data is obtained for the purposes of administering, delivering and evaluating the Rose Vouchers Project, and will not be kept for longer than necessary for these purposes.

Our legal basis for processing personal data

Performance of a contract

Under the UK GDPR, we generally process Trader's personal data in order to perform a contract (i.e. fulfil the Terms of Use) which we have with you.

Legitimate interests

If we process your personal data, we do so for the purposes of our legitimate interests in operating our programmes. Broadly speaking, this means we can process personal data if we have a genuine and legitimate reason to do so, the processing is necessary to achieve that purpose, and our processing doesn't overly interfere with those individuals' interests, rights and freedoms.

Legal obligations

In addition, we may process certain financial information in order to comply with legal obligations to which ARC is subject, such as tax and accounting requirements.

ARC Mailing Lists

You can also subscribe to ARC's mailing list by providing us with your contact details via our website www.alexandrarose.org.uk. If you choose to receive electronic communications from ARC (such as newsletters and fundraising information by email), then we will need your consent to communicate with you in this way. This is because such communications may be deemed to be 'marketing' for which your explicit consent would be required under the Privacy and Electronic Communications Regulations (PECR), which sits alongside the UK GDPR.

Our website contains all the necessary information regarding consent and opting in to receive electronic communications. ARC only uses email addresses to send relevant information. We do not pass on personal data to third parties unconnected with ARC. Recipients can unsubscribe simply by clicking the link at the foot of ARC's emails or by emailing info@alexandrarose.org.uk

Disclosing your personal data

We will not share any personal data with a third party except where:

- We are transferring data to one of our third-party service providers, such as those we engage to:
 - o Host our Rose Voucher system
 - o Send email communications, such as newsletters, on our behalf
 - o Provide project management software necessary to operate our programmes
 - o Administer and process donations to ARC
 - o Carry out finance and accounting services on our behalf

- We are required to do so by applicable law
- We have obtained your consent

Transferring your personal data overseas

We do not transfer any personal data outside the UK. In the event that we transfer or have cause to transfer personal data outside the UK, we will take appropriate measures to safeguard your personal data, for example, by entering into a contract that includes the international data transfer addendum to the European Commission's standard contractual clauses for international data transfers issued by the Information Commissioner's Office or by transferring the data to a country that has been designated as providing adequate safeguards for personal data.

Your rights

The UK GDPR contains important rights for individuals:

- **The right of access** – ARC will provide, on request by an individual, a copy of the personal data ARC holds about them free of charge. This is called a 'subject access request' and ARC will respond as soon as we possibly can, but at the latest within one month of receipt of a request. In some instances we may be permitted to extend the timeframe in which we respond.
- **The right to rectification** – Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.
- **The right to erasure** – This is also known as 'the right to be forgotten'. The broad principle underpinning this right is to enable an individual to request the entire deletion or removal of all personal data where there is no compelling reason for its continued processing. The right to erasure does not provide an absolute 'right to be forgotten', but individuals have a right to have personal data erased and to prevent processing in specific circumstances:
 - o where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
 - o when the individual withdraws consent; and
 - o when the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- **The right to restrict processing** – Individuals have a right to 'block' or suppress processing of personal data. When processing is restricted, ARC is permitted to store the personal data, but not further process it. ARC can retain just enough information about the individual to ensure that the restriction is respected in future.
- **The right to object** – Individuals have the right to object to direct marketing (including profiling) and processing for purposes of historical research and statistics. The UK GDPR defines "profiling" as any form of automated processing intended to evaluate certain personal aspects of an individual, in particular to analyse or predict their economic situation, health, personal preferences, reliability, behaviour, location or movements.

- **The right to data portability** – Individuals have a right to obtain and reuse their personal data for their own purposes across different services.
- **Rights in relation to automated decision making and profiling** – The UK GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention.

Changes to this Privacy Policy

We may make changes to Rosie to add, for example, new features. As a result of these changes, and if there are any changes in applicable law, we may make changes to how we process your Personal Data. If and when we make such changes, we will update this Privacy Policy, so please check it regularly. If these changes have a material impact on your privacy rights, we will notify you.

Complaints

If you have any complaints about the way in which we use or have used your personal data, please get in touch with us using the details in the 'Contact us' section below. We would be happy to help and discuss your concerns.

You are also entitled to make a complaint to the [Information Commissioner's Office](#)

Contact us

To contact ARC about exercising any of your data subject rights, such as to make a subject access request or to rectify personal data that is inaccurate or incomplete, please email info@alexandrarose.org.uk.

To find out more about your rights you can also visit <https://ico.org.uk/for-the-public/>

Other relevant policies

Privacy Policy - General

Privacy Policy - V-Store

Data Handling Principles

Data Protection
