

# Privacy Notice for Fundraising Activities

Document Number	Document Author	Assured by	Review Cycle
PRQ15	Kerry Bardsley	SMT	3 yearly

This document is version controlled. The master copy is on the shared drive. Once printed, this document could become out of date. Check the shared drive for the latest version.

## Contents

1. Introduction .....	2
2. Our details .....	2
3. General Data protection principles .....	2
4. What information does Strode Park collect? .....	2
5. Why does Strode Park process personal data? .....	3
6. Who has access to data? .....	4
7. How does Strode Park protect data? .....	5
8. For how long does Strode Park keep data? .....	5
9. Your rights .....	5
10. Your duty to inform us of changes.....	6

## 1. Introduction

We are committed to protecting your personal information and being transparent about what we do with it, no matter how you interact with us. That's whether you want to work, volunteer or advocate for us, donate, buy goods or use our services, want information, training or want to learn more about what we do.

This privacy notice describes how we collect and use personal information about you, in accordance with the General Data Protection Regulations (GDPR). We encourage you to read this notice carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. As a data controller, we are responsible for deciding how we hold and use personal information about you. This notice explains to you what decisions we have taken in relation to that information.

## 2. Our details

**Data controller:** Strode Park Foundation, Strode Park House, Lower Herne Road, Herne, Herne Bay, Kent, CT6 7NE.

**Data protection officer:** Kerry Bardsley, HR Director

## 3. General Data protection principles

In collecting and processing your personal information, we will comply with the data protection law in force at the time. This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## 4. What information does Strode Park collect?

When you engage with us by phone, mail, in person or online, we may collect information about you (referred to in this Privacy Notice as 'personal information'). This may include your name, address, email address, telephone number, date of birth, job title and details of your education

Privacy notice for Fundraising Activities	Expiry Date: 19th June 2022	Version No. 2	Page 2 of 6
---	-----------------------------	---------------	-------------

and career, why you are interested in Strode Park, and other information relating to you personally which you may choose to provide to us.

Data protection law recognises that certain types of personal information are more sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

Sensitive information will only be collected where necessary, for example, we may need to collect health information from you when you register for a challenge event. Clear notices will be provided at the time we collect this information, stating what information is needed, and why.

### Direct Collection of Data

We collect this information in a variety of ways when you interact with us. For example, this could be when you: support our work through a donation; fundraise on our behalf; register for an event; buy goods from us; submit an enquiry; give us feedback; or, make a complaint.

### Indirect Collection of Data

When you interact with us on social media platforms such as Facebook, WhatsApp, Twitter or LinkedIn we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices.

We may obtain information about your visit to our site, for example the pages you visit and how you navigate the site, by using cookies. Please visit our cookies policy for information on this.

Data will be stored in a range of different places, including on your application record, in our electronic HR management systems, in your paper employee file and on other IT systems (including email).

## 5. Why does Strode Park process personal data?

We will use your personal information for the following purposes:

- Donation processing: We will process personal information you provide in order to administer any one-off or on-going donations you make and claim Gift Aid.
- Responding to a request: If you contact us with a query, we may use your personal information to provide you with a response.
- Fundraising or direct marketing: We will only send you marketing information by email, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in to receive marketing information again, then your most recent

Privacy notice for Fundraising Activities	Expiry Date: 19th June 2022	Version No. 2	Page 3 of 6
---	-----------------------------	---------------	-------------

preference may supersede. If you respond to a fundraising appeal by post, you may also receive fundraising mail, which you can opt out of at any time.

- Monitoring and Evaluating: We may use your information in order to improve current and future delivery of our services.
- Transactional purposes: We will need to use your personal information in order to carry out our obligations arising from any contracts entered into between you and us for goods or services, for example, processing your order and payment for a product from our online shop.
- Providing and developing our website: We may use your personal information to help provide you with access to our website, personalise your experience, and improve and develop it further.
- Administration: We may use your personal information to record and deal with a complaint, record a request not to receive further marketing information, record what our volunteers have done for us, and for other essential internal record keeping purposes.
- Prevention of crime: We may record your image on CCTV which we use to prevent crime and keep our people and the public safe.
- Market research and surveys: We may invite you to participate in surveys or market research to help us improve our website, fundraising, services and strategic development. Participation is always voluntary and no individuals will be identified as a result of this research, unless you consent to us publishing your feedback.
- Legal, regulatory and tax compliance: Where required we are subject to a legal obligation, we may process your personal information to fulfil that obligation.
- Profiling and analysis: We may occasionally for the purposes of our legitimate interests use your personal information to conduct profiling of our supporters or potential supporters. This will help us target communications in a more focused, efficient and cost effective way, helping us reduce the chances of supporters and potential supporters receiving inappropriate or irrelevant communications. You can object to such use of your personal information for profiling at any time by contacting us at the details set out at the beginning of this Privacy Notice.

## 6. Who has access to data?

We will only use your information for the purposes for which it was obtained. We will not, under any circumstances, sell or share your personal information with any third party for their own purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

We will only share your data for the following purposes:

1. Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, projects, or fundraising activities and appeals. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses.
2. Where legally required: We will comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of

Privacy notice for Fundraising Activities	Expiry Date: 19th June 2022	Version No. 2	Page 4 of 6
---	-----------------------------	---------------	-------------

crime. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

We always aim to ensure that personal information is only used by those third parties for lawful purposes in accordance with this Privacy Notice. We may transfer the personal data we collect about you to countries outside the EEA so long as there is a lawful basis for doing so or we have your consent. In certain circumstances we may seek your explicit consent to send your personal data outside of the EEA. When doing so we will inform you in clear terms of the data protection framework in place in the relevant countries in order to enable you to make an informed decision.

Before sending your personal data to countries outside of the EEA data we will ensure that adequate data protection provisions are in place, the processor has provided appropriate safeguards to ensure enforceable rights and legal remedies or other specified conditions are met under data protection law.

## 7. How does Strode Park protect data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Where Strode Park engages third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 8. For how long does Strode Park keep data?

We will keep your personal information in respect of financial transactions for as long as the law requires us to for tax or accounting purposes (which may be up to six years after a particular transaction).

If you request that we stop processing your personal information for the purpose of marketing we may in some instances need to add your details to a suppression file to enable us to comply with your request not to be contacted.

In respect of other personal information, we will retain it for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the Information Commissioner's Office.

## 9. Your rights

As a data subject, you have a number of rights. You can:

Privacy notice for Fundraising Activities	Expiry Date: 19th June 2022	Version No. 2	Page 5 of 6
---	-----------------------------	---------------	-------------

- access and obtain a copy of your data on request;
- require Strode Park to change incorrect or incomplete data;
- require Strode Park to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Strode Park is relying on its legitimate interests as the legal ground for processing; and

If you would like to exercise any of these rights, please contact Strode Park’s Data Protection Officer (details above) stating you wish to make a **subject access request**. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

## 10. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Version History				
Version	Date	Revision Description	Editor	Status
1.0	19 <sup>th</sup> June 2019	Approved by SMT	KB	Approved

Privacy notice for Fundraising Activities	Expiry Date: 19th June 2022	Version No. 2	Page 6 of 6
---	-----------------------------	---------------	-------------