

Privacy Notice for Donors & Supporters

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as donors and supporters of our organisation, of the types of data we process about you (supporters includes those who fundraise for us, who attend our events, buy goods from our eBay store, and who support our organisation with goods in kind). We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data when relevant

B) TYPES OF DATA HELD

We keep several categories of personal data on our donors and supporters in order in order to enable us to process your donation and communicate with you about an event you are undertaking or attending. We will need to collect as much data as necessary to do what you have asked us. This will include, as a minimum, contact details, a record of what you have chosen to contact us about, any agreed actions we take and any correspondence with us.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers, email address
- b) Bank account and Paypal details
- c) Gift aid status
- d) Photographs

C) COLLECTING YOUR DATA

You may provide several pieces of data to us directly during the donation process, when you purchase something from our eBay shop or when fundraising for us, undertaking or attending an event . We may also obtain some personal information from you depending on your privacy settings, when you interact with us on our social media platforms.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Acknowledgement and processing of a donation	Our legitimate interests
Acknowledgement and processing of your eBay purchase	Our legitimate interests
Provision of information about events and activities	Consent
Provision of information about our services and activities	Consent
Utilisation of photographs in our publications, website or social media	Consent
Acknowledgement and processing of Gift aid claims	Legal Obligation
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data

We do not carry out processing activities using special category data for donors and supporters.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to process the donation or communicate with you about an event you are attending or undertaking.

G) WHO WE SHARE YOUR DATA WITH

Employees within our organisation who have responsibility for fundraising and finance will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

We may also share your data with third parties for other reasons to comply with a legal obligation upon us.

- Minimised data will be acknowledged in our annual report for individual donations, in the format of first name initial and surname i.e. B. Smith. This report is available on our website
- Minimised data will be acknowledged in our annual report for donations in memory and legacies i.e. in memory of B Smith. This report is available on our website
- Organisation names will be acknowledged in our annual report for donations, support or funding. This report is available on our website

- Photographs will be used in our charity publications and leaflets, on our website and social media pages when explicit consent is granted

We use a third party to provide our customer relationship management (CRM) system and we have a data processing agreement in place with this third party to ensure data is not compromised. They must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

H) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

I) RETENTION PERIODS

We only keep your data for as long as we need it for, which, in relation to financial records is six years (ten years for some specific purposes) after we have finished working with you to ensure we have a record of what we did in the event of a complaint, or legal claim and to meet legal obligations.

Data relating to event attendance or participation will be destroyed within 3 months of the event date. However in the event of a complaint or a legal claim data will be kept as per financial records.

Data Supplied to us, usually from a funeral director, relating to the acknowledgement of donations in memory to a relative will be destroyed once acknowledgement is made.

Gift aid details will be retained as per financial records

Bank account details will be retained as financial details, initial completed forms to supply this data will be destroyed when the first payment has been made successfully

After six, or ten years in some circumstances, we will retain a minimised data set of your contact with the organisation for the reason of potential legacies. With specific regards to the national Age UK charity, we may need to prove a local relationship with the individual. As such, minimised data of only: name, post code, date of birth and dates of support/ donations will be retained indefinitely, unless you have already withdrawn your consent and have asked for 'erasure' of your record.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data, but this could affect the donation you are making and our communication with you about events.

J) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification'
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure'
- e) the right to restrict the processing of the data

- f) the right to transfer the data we hold on you to another party. This is also known as 'portability'
- g) the right to object to the inclusion of any information
- h) the right to regulate any automated decision-making and profiling of personal data

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use, but this could affect the activity we were undertaking with you. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Vicky Shepherd, Chief Executive via the contact details below.

K) MAKING A COMPLAINT

You are able to raise a complaint with the organisation if you think your data rights have been breached by contacting Vicky Shepherd, Chief Executive, Age UK Blackburn with Darwen, 4 King Street, Blackburn, BB2 2DH. By telephone on 01254 266620 or by visiting our website: ageukbwd.org.uk and search for complaint. Our Complaints Policy & Procedure is also available on our website.

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

L) DATA PROTECTION COMPLIANCE

Our Operational Data Protection Lead is:

Sharon Lucas, Head of Prevention & Wellbeing
Age UK Blackburn with Darwen, 4 King Street, Blackburn, BB2 2DH
Tel: 01254 266620
Email: data@ageukbwd.org.uk

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Next due for review May 2019

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