

## **APPENDIX 3 - Supporters - Fundraising & Communications**

### **How do we collect information about you?**

We obtain information about you in the following ways:

#### *Information you give us directly*

For example, we may obtain information about you when you take part in one of our events, make a donation, apply to volunteer for us, purchase products and services, or when you register to receive one of our newsletters.

#### *Information you give us indirectly*

Your information may be shared with us by third parties, which might include:

- independent event organisers, for example the London Marathon and fundraising sites like Just Giving
- professional fundraisers
- subcontractors acting on our behalf who provide us with technical, payment or delivery services, our business partners, advertising networks analytics providers and search information providers.

### **What type of information is collected from you?**

The personal information we collect, store and use might include:

- your name and contact details (including postal address, email address and telephone number);
- your date of birth;
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location;
- your bank or credit card details. If you make a donation online or make a purchase, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions;
- information as to whether you are a UK taxpayer so we can claim gift aid; and
- any other personal information shared with us.

Data protection laws recognise certain categories of personal information as ‘special category’ and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We do not usually collect special category data about you unless there is a clear and valid reason for doing so and data protection laws allow us to. For example, we may ask for your health information if you are taking part in one of our fundraising running events.

Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for.

### **Public Information**

We supplement information on our supporters with information from publicly available sources such as annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a fuller understanding of someone’s interests and support. For more information, please see the section on ‘Building Profiles’ below.

### **How and why is your information used?**

You have a choice about whether or not you wish to receive information from us. If you want to receive direct marketing communications from us about the vital work we do for families, our fundraising appeals and opportunities to support us, as well as the products and services you can buy, then you can sign up to receive our quarterly newsletter by completing the relevant section on our website.

**Email/text/Phone/Post**

We will only send you marketing and fundraising communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails. We may send you marketing and fundraising communications by post unless you have told us that you would prefer not to hear from us.

**How long is your information kept for?**

We are committed to putting you in control of your data so you are free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (eg health/safety and tax/accounting purposes). We review our retention periods on a regular basis.

**Who has access to your information?**

We do not sell or rent your information to third parties.

We do not share your information with third parties for marketing purposes.

However, we may disclose your information to third parties in order to achieve the other purposes set out in this notice. These third parties may include:

**Third parties working on our behalf**

We may pass your information to our third party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. We will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so.

**Third Party Product Providers we work with**

Our trusted third party product providers provide a range of quality and reliable products and services designed to meet the needs of families. When you enquire about or purchase one or more of these products, the relevant third party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a joint controller of your information and therefore we advise you to read their Privacy Notice. These third party product providers will share your information with us which we will use in accordance with this notice.

**Lawful Processing**

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

**Specific Consent**

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

**Performance of a contract**

Where we are entering into a contract with you or performing our obligations under it, like when you buy Home-Start named products and services.

**Legal obligation**

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission or Fundraising Regulator for example, in relation to anti-money laundering purposes.

**Vital interests**

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at one of our events) or a safeguarding issue which requires us to share your information with the emergency services.

**Legitimate interests**

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running a charitable organisation in pursuit of our aims and ideals. For example to:

- provide our services to support you and your family;
- send postal communications which we think will be of interest to you;
- conduct research to better understand our supporters and to improve the relevance of our fundraising;
- understand how people choose/use our services and products;
- determine the effectiveness of our services, promotional campaigns and advertising;
- monitor who we deal with to protect the charity against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

We may also use your personal information to detect and reduce fraud and credit risk.