

Fundraising Privacy Policy

Privacy & Security

Overview:

Northern Ireland Chest Heart and Stroke ("NICHS") is committed to protecting information about you (which we call your "personal data") and clearly stating what personal data we hold about you and how we use it. It also explains your rights in relation to your personal data.

This policy will clarify how NICHS collects personal data and the ways in which we use it to process donations, provide services, or fulfil merchandise you have purchased, or information you requested. Personal data may be collected online, by phone, email, text, postal mail or through face to face meetings.

All the personal data we hold is processed in accordance with the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 (both referred to throughout this document as the "Data Protection Laws") and the Personal Electronic Communications and the Privacy & Electronic Communications Regulations 2003.

NICHS is the Data Controller of your personal data and if you have any questions you would like to ask, or need clarity about the storage, or use of your personal data please contact our Data Protection Co-ordinator – Gareth McGleenon on 028 90320184.

This Privacy policy sets out:

- 1.0 Who NICHS is and how to contact us
- 2.0 Personal data we collect about you
- 3.0 What we do with the personal data we collect
- 4.0 Your personal rights regarding data processing
- 5.0 Children and data collection
- 6.0 Your data and NICHS's social media sites and website

1.0 Who is NICHS?

NICHS is a leading Northern Ireland health charity. We are both a registered Northern Ireland charity and a company limited by guarantee.

Full legal information for each:

Northern Ireland Chest Heart & Stroke (NICHS) is a charity registered in Northern Ireland. Registered Charity number NIC103593.

Northern Ireland Chest Heart & Stroke is a company registered in Northern Ireland at 21 Dublin Road, Belfast BT2 7HB. Reg. Company Number NI 18889.

Phone Number: 028 9032 0184

Web address: <https://www.nichs.org.uk> Email address: mail@nichs.org.uk

This policy may change or be updated from time to time. Changes will be posted on this web page and will apply from the time they are posted. The posting date of this policy is 25th May 2018.

2.0 Personal data we collect about you:

2.1 Personal data provided by you.

When you donate, seek access our services, sign up for an event, purchase merchandise, request information, or a telephone response, we will collect any of the following personal data - name, address, email address, phone contact number and bank or credit card information details - if they are needed to process a service you are requesting, or a donation being made. We collect this personal data to provide the service to you, and cannot provide the service without this personal data.

We may request additional personal data such as tax payer status, interests, relationship connections, or age group to help us provide an enhanced supporter relationship. We collect this personal data on the basis of our legitimate interests in promoting and managing our organisation and we balance that against your rights and freedoms.

We will collect your IP address, web pages accessed, online ads interacted with, videos viewed etc via Google Analytics. This information is collected via Cookies placed on your device when you visit our website. Please see section 5.0 below for more information on how and why we use Cookies. We collect this information on the basis of our legitimate interests in promoting and managing our organisation and we balance that against your rights and freedoms.

2.2 What do we do with the information?

We would like to send you information about the work you make possible and to offer the opportunity to offer further support should you want to. Please see section 2.3. on the ways in which we will use your information.

We want you to be happy about how and when we contact you. We use personal data collected to make sure you only receive relevant information which also means we save our charity money by avoiding wastage.

Where we are marketing to you by email or telephone, we will comply with the rules of PECR and only do so where we have your consent. This consent can be withdrawn at any time as set out in the paragraph below.

We may market to you by other means (for example by post) on the basis of our legitimate interests as set out above. You can object to this at any time by contacting us.

How you want to hear from us will always be respected. If you want to change how you receive our marketing communications by post, phone, email or text you can email supportercare@nichs.org.uk or call our Supporter Care Team on weekdays between 9am-5pm on 028 90 26 6709. Your data record will be updated as quickly as we can, but please allow at least 30 days to cover any postal mailings that may have been generated prior to your request.

2.2 Using Legitimate Interest to process your Personal Data

We may process your personal information for our legitimate business interests.

Legitimate interest means the interests of NICHS in conducting and managing our business to enable us to give you the best service and secure experience in your dealings with us.

For example, we have an interest in making sure our marketing is relevant to you. To help us do this we may process your information internally to send you tailored, marketing information.

This also applies to processing that is in your interests also. For example, to protect you against fraud when making transactions on our website and to ensure our IT systems are secure.

When we process your personal information we make sure to consider and balance any potential impact this may have on you and your rights under data protection legislation. Our legitimate interests do not over-ride your personal interests and we will not use your personal information for activities where our interests are overridden by the impact it may have on you.

2.3 How we use the personal data you provide:

- Progress our charitable aims including fundraising.
- Fulfil your requests including processing of donations, setting up a regular gift, entry into raffles or competition entries.
- Process online sales transactions, event registration including your ticket(s), merchandise or product purchases, or other payments and verification of financial transactions.
- Gift Aid processing on your behalf with HMRC.
- Dispatch any communications including information leaflets, campaign information, supporter thank you letters, updates, newsletters, annual review and e-zines.
- Record any contact we have with you including queries, feedback and complaints.
- To comply with our legal obligations, policies and procedures.
- Prevent or detect fraud or abuse of our website.
- To enable partner organisations to carry out technical, logistical or other functions on our behalf.
- To carry out research and analysis - we collect your personal data to create a profile of your preferences and interests. We will use the information generated, to tailor products and services which may be of interest to you.

2.4 Sharing your personal data:

It is not our policy to sell or share our supporters data with 3rd parties for their own marketing purposes and we will never do this. However there are occasions we may need to share your personal data to help us fulfil our charitable aims, for example:

- We may need to share your data with carefully chosen partner organisations to undertake work on our behalf. Our partners include fundraising and marketing agencies and consultants, mail houses, event management and IT specialists. They may be commissioned to undertake work which includes data processing, packaging, mailing and delivering merchandise or products, answering questions about products or services, sending postal mail, emails and text messages, carrying out research or analysis and processing payments. We will only supply the data needed to fulfil a particular process or service.

- To enable compliancy checks to be carried out, such as for the Mail Preference Service, Telephone Preference Service or Fundraising Preference Service.
- If we are required to share your personal data due to a legal requirement by an order of the Court or law enforcement agency.
- It is done to protect our rights, property or the personal safety of our employees or visitors to our premises or websites.

To abide by the requirements of the Data Protection Laws and the Privacy & Electronic Communications Regulations 2003.

2.5 Personal data from 3rd Parties:

Occasionally we may need to use a 3rd party company to help us with fundraising activities. This may be through phone calls, face to face, data supply via purchase of mailing lists, or through an events company. These suppliers may collect personal data, such as name, address, contact details, financial information, tax status and communication preferences. This personal data is needed to set up regular donations, cash donations or service event registrations.

We may also receive personal data from 3rd parties who supply us with personal data about you so that we may deliver the best experience for our supporters. For example we check the data we hold on our database against address registers to check for deceased records, or supporters who have moved house so we don't waste money sending mail when someone has moved away.

We also receive personal data from organisations you interact with and with whom we also work, such as Just Giving, BT My Donate, Virgin Money Giving, Google, Facebook, Payroll Giving Agencies and Professional Fundraising Organisations, if you have given them your permission to do so.

3.0 What do we do with the personal data we collect ?

3.1 Storing your personal data

We place the utmost importance on the security of the personal data we hold about our supporters. Your personal data is mainly stored on our Fundraising database, or securely held on our internal IT systems. We store paper records for accounting purposes to comply with financial regulations. All records of this nature are securely stored and destroyed after the statutory seven year accounting period.

3.2 Communicating with you:

We will securely store personal data to reflect how our supporters may wish to be contacted, to comply with the law and to ensure we do not communicate with people who have asked us not to. If you ask not to be contacted we will continue to hold a skeleton record of sufficient personal data, such as name and address details, so we don't accidentally contact you again in the future. Your record will then be flagged as 'no contact' on our database.

3.3 How long we keep your data:

We will keep your personal data for as long as you wish to support us. After your last point of contact with us, personal and financial transaction data will be retained for a period of seven years from the last financial transaction to enable NICHHS to comply with its legal financial retention period. Personal data will then be deleted from our database.

If you use your credit card to donate, buy services or merchandise online from NICHHS, it will be processed by PayPal, or Braintree Ltd their subsidiary, or WePay. An electronic receipt will be sent to confirm the transactions. Once your payment has been cleared, it will be downloaded to our Raisers Edge database and recorded there. Your personal contact details and contact preferences, if given, will also be recorded. Payments or donations made over the phone will be processed securely by our trained fundraising staff and recorded as above.

After a credit card payment has been made card details and security codes are destroyed. It is our policy to send a written confirmation and letter of thanks to the card holder whether this is required by the donor or not. Only administrative fundraising or supporter care staff can process credit card transactions.

We ensure payments are made in accordance with the Payment Card Industry Data Standard (PCI). Further information on what this means can be found here:

https://www.pcisecuritystandards.org/security_standards/index.php

4.0 Your Personal rights regarding data processing

The Data Protection Laws gives you certain rights over your data and how we use it. These rights are generally all provided free of charge (unless they are manifestly unfounded or excessive) and will be actioned within one month (unless the request is complex or you have made a number of requests).

If you wish to exercise any of these rights please contact our Data Protection Co-ordinator in writing at NICHHS, 21 Dublin Road, Belfast BT2 7HB or by emailing gmcleeson@nichs.org.uk

Please note, we may not always be in a position to comply with your request, but we will let you know if that is the case.

You have rights to your data

- Right of Access: You can request a copy of the information we hold about you.
- Right to rectify: You have the right to request a change to your data to ensure accuracy if it is factually incorrect.
- Right of Erasure: In certain circumstances, you have the right to request your data is deleted.
- Right to restrict processing: You have the right to request your data is no longer processed, but not deleted.
- Right of Portability: In certain circumstances, you can request your data is given to you in a common usable format such as a word document or pdf.
- Right to object: You can object to your data being processed in certain circumstances, for example, when we are processing it on the basis of our legitimate interests. .
- Right not to be profiled: You can object to your data being used to generate a profile about you.
- You also have the right to withdraw your consent if you have given it previously, as we have set out above.

You have the right to complain to the Information Commissioners Office (the "ICO") about how we treat your personal data and you can contact them by email casework@ico.org.uk or telephone **0303 123 1113**.

For more information about your rights under the Data Protection Laws, go to the Information Commissioner's website at ico.org.uk.

NICHS is not a 'public authority' as defined under the Freedom of Information Act 2000 and we will not therefore respond to requests for information made under this Act.

5.0 Children and data collection.

Some of the services we offer are aimed specifically at children (for example Well Schools and Chester's Challenge). To deliver these services safely it is necessary for us to collect data and store it on our database.

It is our policy not to request donations from children aged under 18 years, or include them in general marketing mailings without the express written permission of their parent/s or Guardian.

Children under 18 may take part in our Events with the permission of their parents. When a child registers for an event on our website, this is flagged by ticking an age control box. Registration is allowed to continue, but will prompt a phone call from the

Events team to request a parent or guardian to complete a permission form for their child.

6.0 Social media sites and the NICHS Website

6.1 Cookies

We use cookies on our website and fundraising microsite. A cookie is a small text file placed on your electronic device by websites you visit. **Cookies** are messages that web servers pass to your web browser when you visit internet sites. Your browser stores each message in a small file, called **cookie.txt** . When you request another page from the server, your browser sends the cookie back to the server. Cookies are used to identify users, store shopping cart information, and prepare customized web pages that use user information.

We use cookies to better your experience when you visit our website. They help us to understand how our website is performing and areas that are not, so we can improve them. They also enable us to monitor how our advertisements are performing.

You can change how cookies are stored on your machine by clicking on the 'Tools' menu in your internet browser.

6.2 Keeping you safe on our website:

We keep your personal information secure when you visit our website using encrypted SSL technology supplied by Globalsign.com.

We undertake social media activity including Facebook, Twitter, Instagram and YouTube. Although this policy covers how we will use any personal data collected from those web-pages, it does not cover how the providers of social media platforms will use your personal data. Please ensure you read the privacy policy of the relevant social media platform before sharing data. You can make use of the privacy settings and reporting mechanisms in your browser to control how your data is used.

6.3 Other people's data on social media.

Some of the services we offer allow you to provide the personal data of other people such as tagging people on photos on social media. Before providing anyone else's data please ensure they are happy for you to do so and under no circumstances must you make public another individual's personal data.

If you have any questions about this policy or would like any further information in relation to how we use data please contact the Data Protection Co-ordinator at NICHHS, 21 Dublin Road, Belfast BT2 7HB.