



## Data Protection Policy

This policy sets out our obligations to members of the public in accordance with the General Data Protection Regulations (GDPR) that became UK law in May 2018.

For more information on anything contained in this policy, please contact Jennie Gillions, Head of Fundraising and Communications: [jenniegillions@hope4c.org](mailto:jenniegillions@hope4c.org); (0)1442 234 561

### Types of information

- **Information you give us:** e.g. when you post information on our social media; make a donation; register for a Challenge; or provide us with personal information any other way. Typically, this will include your name, email address, telephone number, date of birth, bank account details for setting up a regular direct debit gift and/or contact preferences.
- **Information we get from your use of our website and services:** we collect information about online content of ours that you use and how you use it, e.g. when you visit the website. We, like all charities with an online presence, are able to confirm what browser you are using, your IP address and the computer operating system(s) you use.
- **Information from known third parties:** we may also receive information about you from third party partners with whom you choose to interact, e.g. JustGiving. This can include your name, postal/email address, phone number, your geographic location, credit/debit card details and whether you are a tax payer so that we can claim Gift Aid. You will be notified when we or a third party gathers your information.
- **Information available publicly:** we may access information from e.g. Companies House, the Charity Commission, LinkedIn and information that has been published in articles/newspapers. Please contact us for further details on this and how we ensure your information remains secure.

We may use the above information for a variety of reasons, e.g. marketing, improving our service to you, and/or processing your donations.

**If you are under 18, please ensure that you have explicit written consent from a parent or guardian before giving us your personal information. As you would expect from a children's charity, we take the security of children and young people very seriously and will only collect information from under-18s for specific purposes and if absolutely necessary.**

### Credit/debit card details

We do not store any credit/debit card details. Any credentials that, on occasion, appear on a PDQ statement (paying-in slip) are immediately removed and shredded. Please contact Migena Kovaci, Finance Manager, for further information: [migena@hope4c.org](mailto:migena@hope4c.org)

### Sensitive personal data

Certain categories of personal information are regarded by the law as more sensitive than others.

This 'sensitive personal data' (also known as 'special category data') covers e.g. ethnic origin, sexuality, religious beliefs, health status, political opinions or any genetic/biometric data that is used to identify you.



We only collect sensitive data if we really need to, e.g. if you're doing a Team Hope Challenge and we need to make sure we provide appropriate facilities/medical support to keep you safe. We may also collect sensitive personal data if you tell us about personal experiences related to one of our projects.

We will always tell you if you are sharing sensitive personal data, and give you the opportunity to tell us how you want this information stored/used, if at all.

### Recruitment

If you apply to work at Hope for Children, we will only use information you give us to process your application or to monitor recruitment statistics. If we need to talk to someone outside of Hope – e.g. requesting a reference from your previous employer - we will tell you beforehand.

If you are unsuccessful in your job application, we may hold your personal information for six months after we've finished recruiting for that post. This enables us to deal with any follow-up queries, or – should the situation arise/your contact preferences allow – invite you to apply for an alternative position that could suit you.

We keep statistical information about all applicants, but this is all anonymised.

If you start work at Hope, your personal information will be processed in accordance with your employment contract and other applicable policies.

### How we use your information

- To provide you with the services, products or information you have requested;
- To provide information about our work, volunteering or challenges/events. Unless we have 'legitimate interest' for contacting you (see section below), we will only contact you if we have your explicit permission to do so;
- To process donations we receive from you, or to create online accounts for you;
- To fundraise;
- To ask you to engage with our website/social media/surveys;
- For administration purposes (for example we may contact you regarding a donation you have made or the event you have registered for);
- For internal management, such as record keeping of enquiries, feedback or complaints;
- To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic or to personalise the way our information is presented to you;
- To analyse and improve our online facilities;
- For supporter research;
- To check our risk of fraud
- We do not share, sell or rent your information to third parties for marketing purposes. However, your personal information may be disclosed to 'data processors': e.g. Blackbaud, the company that hosts our database. Should we choose to use data services based outside of the UK, we will always take steps to ensure your personal data remains subject to the same protection you can expect from providers in the UK.



- If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws - such as defamatory, abusive, or hateful content on our forums or social media pages - it may be necessary for us to use your personal information to inform relevant third parties, e.g. your internet provider or law enforcement agencies.
- We only retain your personal data for as long as it is needed, and according to legal requirements for retention of that data.

### Prospect management

We may analyse the information we hold on you to determine how receptive you might be to a specific campaign or event invitation. If we believe you could be interested in supporting Hope, we may develop a profile of you - from our data and publicly available data – before we contact you in the way we think most appropriate. **We do not do wealth screening.**

You can opt out of your data being used in this way by contacting our Head of Fundraising and Communications.

However, please note that before seeking or accepting large donations we will undertake due diligence to make sure we are not at any risk of accepting e.g. laundered money. If opting out of having your data analysed means we can't satisfy ourselves Re due diligence, we may not be able to accept donations from you.

### Legal basis for contact

The law requires us to set out the lawful grounds on which we collect and process your personal information as described in this policy.

#### **We may have Legitimate Interest:**

Legitimate interest essentially means our ability to run Hope effectively and within our charitable remit. Bearing this in mind, we can:

- Send fundraising materials to existing supporters by post;
- Conduct research on our supporters and how they respond to marketing;
- Process donations;
- Administer events and challenges;
- Recruit and take applications for volunteers, and contact volunteers about their role

Legitimate interest also includes **your** interests, relating to e.g. information you've requested from us.

We will never utilise legitimate interest if the impact on you is deemed too intrusive, or if the impact on you outweighs any benefit to us. At any time, you can request no more contact of any nature from us, and we will comply until you get back in touch.

#### **Consent:**

Most of the time we will request your explicit consent to use your personal information for any purpose. You are able e.g. to consent to receive updates on work but NOT fundraising materials. Please note that consent can be granted via email, post or over the phone.



### Legal Obligation:

We may need to collect, process and disclose personal information if we're legally obliged to. We have to retain Gift Aid declarations for auditing purposes, for example, and if you post anything malicious on our social media we may be obligated to pass your information to the police.

### Performance of a contract:

If you start working for Hope, we need to be able to process your information for the purpose of meeting our contractual obligations.

### Your legal rights

- **Right to be informed** – you have the right to be told how your personal information will be used;
- **Right of access** – you can ask us to confirm what information we hold on you, and you can file a Subject Access Request to see a copy of that information. Provided you can prove you are who you say you are, we will provide you with your personal information subject to any exceptions that apply. We generally have one calendar month to comply with your request:  
<https://ico.org.uk/your-data-matters/your-right-of-access/> .
- **Right of erasure** – at your request we will delete your personal information from our records as long as we don't have an overriding legitimate reason for keeping it (e.g. to comply with a legal obligation);
- **Right of rectification** – if any information we have is inaccurate, or you think it might be, you can ask us to check for you and have your records updated. You can also ask us to hold off processing your information if a) it might not be accurate, or b) you're not sure whether we're using it legitimately;
- **Rights related to automated decision-making** – there are some processes, e.g. credit scoring, which are automated; if you would rather humans were involved, you can challenge any automated decisions and request a repeat process with human intervention;
- **Right to object** – you have the right to object to us processing your information if a) we're using it via legitimate interest and you don't think we have the right, b) we're using it for direct marketing and you don't want us to, or c) if you have any other real concerns.

You always have the choice to change how you want to be contacted, if at all. You can email us, call us or write to our office to opt out of any communications, though please be aware that we may have to call/write to you if we are unclear about your request.

If you have told us you don't want to be contacted for marketing purposes (this includes fundraising), we will mark your records accordingly so we don't contact you accidentally. However, please be aware that we may still need to contact you for the following reasons:

- Processing any donations you make (this is an auditing requirement);
- Sending you information if you have registered for e.g. a challenge;
- Settling any complaints you make;
- Dealing with any future legal issues



You can also enter your details on the Fundraising Preference Service and choose to stop all/certain forms of contact from us. Visit [www.fundraisingpreference.org.uk](http://www.fundraisingpreference.org.uk) or call the telephone helpline on 0300 303 3517. Once you've made your request, we have 28 days to update your records.

For more information on your rights, you can visit the Information Commissioner's Office:  
<https://ico.org.uk/>.