

Date Issued:	November 2020
Date Reviewed:	



St David's Children Society Fundraising and Marketing Privacy Notice

Context

St David's Children Society is a Voluntary Adoption Agency established in 1942 to provide adoption services across Wales. The society's primary functions are to recruit, approve and support adoptive families providing safe permanent homes for children who require adoption.

St David's Children Society is a Registered Charity (Registration Number 509163) and a company limited by Guarantee (Registered Cardiff 1546688).

St David's Children Society is committed to protecting your privacy. This statement explains how we use the information you give us and the ways in which we protect your privacy.

Under the Data Protection Act 2018 and the General Data Protection Regulation 2018 **Wendy Keidan, Chief Executive Officer** of St David's Children Society is the '**data controller**' and is responsible for ensuring personal data held about you is used for the purposes set out in this notice.

What this policy covers

This privacy policy applies to the data we collect in the following ways:

- Data acquired through the completion of the Post Adoption Order Consent for Contact Form.
- Data acquired through online or postal donations
- Data acquired through the support of fundraising activities.

How do we collect information?

We obtain personal information from you when you complete the Post Adoption Order Consent for Contact form, enquire about our fundraising activities, send or receive an email, make a donation or payment, or otherwise provide us with your personal information.

We also gather general non-identifying information when you use our websites to improve them and the experience of their users (for information please see below for our website privacy policy and 'cookies').

What information do we collect?

The type of information we collect and how we use it varies depending on why you are providing it. It may include:

- Your title, name, gender and date of birth.
- Your address, telephone number, mobile number, email address, and your preferences as to how we should contact you in the future.
- The information you give us when completing one of our consent forms.
- The information you give us when filling out one of our online forms.
- The financial information you give us when making a payment or donation, including information about your Gift Aid status.

- Records of your correspondence with us.
- Records of your donation history.
- Non-identifying information about your visit to our website, including technical information such as your IP address
- Any other information provided by yourself that is relevant to your relationship with us, for instance your motivations for supporting our work.

Sensitive Personal Data

Data Protection Law recognises that certain categories of data are more sensitive than others. These are known as special categories of personal data and include information about a person's health, racial or ethnic origin, political opinions, religious beliefs, and from 25 May 2018 genetic and biometric data.

We do not usually collect special categories of data about our supporters, or for marketing purposes, unless there is a clear reason for doing so (i.e. we may ask about your health when you book onto an event to make sure we provide appropriate support and facilities).

Why do we collect your information?

We collect personal information from you in order to:

- Register your consent for contact to communicate with you about aspects of our work that are relevant to you or that you have expressed an interest in.
- Update you on our work, activities and events we offer.
- Communicate with you about fundraising.
- Administer your donation or support your fundraising.
- Respond to an enquiry, question or complaint.
- Register your attendance or support of an event.
- Keep you up to date with the work you are supporting and to ask for support.
- Process payments for goods and services.
- Keep a record of your relationship with us.
- Continually manage your communication preferences.
- Comply with our legal obligations, policies and procedures.
- Meet financial auditing requirements.
- Understand how we can improve our services, products or information.

We use the data you provide to build a positive and personal relationship with you, providing you with the information you want when you want it, and involving you in our work and the future development of our services in a way that is relevant to you, specifically in relation to fundraising.

Legal basis and Legitimate Interests

When we collect and use your personal information, we make sure we adhere to at least one of the legal grounds available to us under Data Protection Law.

- a) **Consent** - We obtain your consent to collect and use your personal information for a previously notified purpose, such as to send you email or text marketing, or provide you with the information or services you have requested. We rely on consent as the legal basis to communicate with our supporters and clients by email and/or text.

- b) **Legal obligation** - In certain circumstances we may process or disclose your information because we are legally obliged to do so – for instance where we are legally required to hold your transaction details for Gift Aid or tax purposes.
- c) **Legitimate interest** - We believe that the people who support our work have an interest in receiving occasional updates from us, which is why we rely on the legitimate interest legal basis to send them direct marketing communications. We also rely on the legitimate interest legal basis to conduct research to better understand and target our supporters and those interested in our services, to monitor who we deal with and conduct due diligence checks to mitigate against potential risks to our agency and service users, as well as to maintain and administer our fundraising database and systems.

We have a legitimate organisational interest to doing this which we balance against your individual rights, making sure we only use your personal information in a way and for a purpose that you would reasonably expect and that does not intrude on your privacy or previously expressed preferences.

Marketing: communicating with you about our work

We use the details you have given to us, in combination with the above legal grounds and any marketing preferences you have provided, to send you information about our vital work, the services we offer that are relevant to you and fundraising or volunteering opportunities.

- a) **Email** - If you provide your consent to us along with your email address, we may communicate with you by email for fundraising or marketing purposes. By opting in to email communication from us, you grant us the right to use your email for this purpose.

As a charity, with limited resources, we currently send the majority of our communications electronically. We would therefore advise that you consent to email contact if you wish to receive the most up to date information from us.

- b) **Post** - If you have provided us with your postal address or telephone number we may rely on the legitimate interest legal basis to send you direct mail, unless you have told us that you would prefer not to receive such information.

We use direct mail to communicate with the individuals who support our work, through donating or giving their time. When an individual makes a donation we write to thank them for their support and let them know that we may keep in contact with them by post and telephone and provide details on how they can opt-out of or change this communication.

Your wishes are important to us

We promise that we will always communicate with you according to your wishes. It's always your choice as to whether you receive information about how we raise funds and the ways you can get involved.

If you do not want us to use your personal information in these ways please indicate your preferences on the form on which we initially collect your data.

You can change how we use the information you have provided to us at any time by letting us know, or amending, your communication preferences. If you do not want to hear from us that is also fine.

Please contact our Business Development Manager on 02920 667007 email fundraisingsupport@stdavidscs.org to change or amend your communication preferences, or ask to not contact you anymore.

How we protect your information

We aim to ensure that there are appropriate controls in place to protect your personal information. As part of our commitment to this we continue to invest in appropriate technologies to secure and appropriately manage your personal information. We work hard to ensure our network, on which we carry out all of our IT functions across the charity, and websites are protected and regularly monitored.

Information sharing

We do not sell or share your personal details to third parties for either fundraising or marketing purposes. We do however use third party suppliers to perform some services on our behalf, e.g., process card payments, manage online fundraising pages, take event bookings etc. In these circumstances we do not give these organisations any rights to use your information except to provide services to us in accordance with our instructions and any agreements we have in place. We take care to ensure that our third party suppliers have appropriate policies and procedures in place to safely manage your data whilst working on our behalf.

Links on our website

Our websites may contain links to third party websites. These third party websites will have their own privacy policies so, if you follow a link to any of these websites, please make yourself aware of their privacy policies before submitting any of your personal information as we do not accept any responsibility or liability for the privacy policies or data handling processes of others.

Transmitting information over the internet

Despite all of our precautions to protect our website and network no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any of the information you disclose to us online and wish to draw your attention that you do so at your own risk.

How long do we keep your information?

We store your information for only as long as is necessary and/or legally required for the relevant activity. Your consent will remain valid for 7 years from the date you provided it. Your consent and communication preferences will be recorded on our database and you will receive written and/or electronic communications in accordance with your wishes. You can

change or withdraw your consent at any time.

We keep information such as your name, address and donation history for 7 years from your last donation in order to fulfil our tax and auditing obligations.

We will not use your details for fundraising or marketing purposes if you have indicated that you do not wish to receive this communication at the point of donation or should you later withdraw your consent. However we will keep information such as your name, address and donation history in our database for financial auditing purposes and to ensure that we don't mail you in the future if you have asked to no longer be contacted for 7 years before your data is destroyed.

How to change the way we contact you

You can change how we use the information you have provided to us at any time by letting us know, or amending, your communication preferences. If you do not want to hear from us that is also fine. Please contact our Business Development Manager on 02920 667007 email fundraisingsupport@stdavidscs.org to change or amend your communication preferences, or ask us to not contact you anymore.

Your rights to your personal information

Under the Data Protection Act 1998 you have a right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. You also have a right to request us to erase your personal information, ask us to restrict our processing of your information, or object to the processing of your information.

Should you wish to exercise these rights we ask you to prove your identity with two pieces of approved identification. Please address requests to the Data Controller, St David's Children Society, 28 Park Place, Cardiff, CF10 3BA and we will respond within 40 days of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records.

Changes to this policy

This policy was last updated in November 2020. We may update the terms of this policy at any time, so please do check it from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our website.