



## Privacy notice for supporters and other external parties

If you are an employee or representative (or applying to become one) or a patient, we have created a specific Privacy Policy which is available on our website:

<https://www.nottshospice.org/privacy-policy/>

### Your privacy dashboard

Here is a short summary of how we process and protect your data, and respect your privacy.

#### Types of data we collect

- Contact details.
- Information about how you support us.
- Information about how we support you.
- Financial information e.g. gift aid and donor information.
- Data that identifies you and other people.
- Data on how you use our services.
- Legacy information.

#### When and how we collect it

We collect data from people using our services, enquiring about our services, engaging with our charitable activity, browsing our website, chatting to us online, on social media or on the phone.

Sometimes you provide us with data, sometimes data about you is collected automatically or provided to us by another organisation.

#### How we use it

- To provide services, support or information.
- To provide activities and events
- To process donations.
- To respond to your enquiries.
- To comply with our legal obligations.
- To fundraise.
- To process orders from our shops.
- For administration purposes.
- For internal management.
- To invite you to participate in our research.
- To analyse and improve our services.

#### Third Parties who process your data

Some services help us keep our organisation and support services running by storing or processing your data. An example of this include Microsoft, which we use for our infrastructure and communications.

#### Know your rights

Your rights include:

- Accessing information we hold on you.
- Having your data corrected.

#### We use cookies

Why? We use necessary cookies to run and improve the service to you on our website.

- Opting out of marketing communications.
- Porting your data to another service.
- Being forgotten by us.
- Complaining about us.

Our third-party service providers use cookies too, which they control.

You can turn off cookies but this will mean, for example, that we can't recognise you online or resolve issues as efficiently.

Any questions about your personal information or this policy should be directed to our registered office at 384 Woodborough Road, Nottingham, NG3 4JF.

## Privacy Notice

We are Nottinghamshire Hospice. We are a data controller in respect of information you provide to us (i.e. the organisation making decisions about how and why your personal information is used).

We are committed to protecting your personal information and being transparent about what information we hold. This Privacy Notice applies to the following individuals;

- Shops – customers and donors.
- Fundraising – donors, supporters and lottery players.
- Family members for those in, or previously in our care, or friend, next of kin, those with power of attorney.
- Emergency contacts.
- Suppliers.
- General enquirers.

The purpose of this policy is to give you a clear explanation about how we collect and use the personal information you provide to us, whether online, via phone, email, in letters or in any other correspondence or from third parties. We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information.

Processing your information in accordance with the law means:

- Being fair and transparent with you.
- Clearly identifying our purpose for processing your information, and checking any additional purpose is compatible with data protection legislation. We document and periodically review these purposes.
- Making sure that the information we process is adequate, relevant and limited to what is necessary for the purpose of processing your information.
- We take all reasonable steps to make sure the information we hold, and process is accurate and where information is incorrect take action to correct this.
- We do not keep information for longer than is required, identifying personal information we no longer need and erase or anonymise information where appropriate.
- Ensuring that we have appropriate technical security measures in place to maintain the integrity and confidentiality of your information.

- It is Nottinghamshire Hospice's responsibility to demonstrate our compliance with data protection legislation.

## How we get the personal information and why we have it

We collect and process your data for different reasons in different circumstances, but we'll only collect and process your data where we have a legal basis for doing so. Our purposes and legal basis for using each type of data are set out below.

Personal data may be provided to us by you directly, or it may be provided to us from other sources, and we have shared below a variety of examples of when and why we process personal information. This list is not exhaustive, and due to the nature of our services there may be times when new categories of personal information may be shared with us, for new and evolving reasons. As a result, we keep this policy under constant review.

- To provide you with the services, support or information you have requested from us.
- To provide information about our work, activities and events - although this will only be where you have consented to being contacted for those purposes, unless we are in a position to rely on the legitimate interest basis for contacting you (see further information below under Legal Basis for Processing).
- To process donations we may receive from you.
- To respond to your enquiries.
- To comply with our legal obligations as a Charity.
- To fundraise in a manner referred to in this Policy, or that you would reasonably expect.
- To manage other fundraising activities such as our Hospice Lottery.
- To deliver products or services to you.
- To process orders from our shops or provide after-sales service.
- For administration purposes (for example we may contact you regarding a donation you have made, including in relation to Gift Aid or an event you have registered for).
- For internal management, such as record keeping of enquiries, feedback or complaints.
- To invite you to participate in our research or surveys.
- To analyse and improve the services we offer, to make them as user-friendly as possible.
- We may collect personal information to conduct supporter research, and this is on occasion through our existing network. We may also analyse information you provide to us with other, freely available public information. This is to create a profile of our supporter interests, preferences and level of potential donations so that we can contact you in the most appropriate way, and with the most relevant information.
- Where collecting and holding your information is required or authorised by law.
- We may use your personal information for the purposes of credit risk reduction or fraud prevention, and may use external specialist agencies to help us).
- Other specific purposes that you may agree to from time to time.

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for our processing this information are:

- **Your consent.** Where consent has been given, you are able to remove your consent at any time. You can do this by contacting us.
- **We have a contractual obligation.** For example, where the processing is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you.
- **We have a legal obligation.** For example, where processing is necessary in order for us to meet our requirements under the Safeguarding legislation, to provide information to law enforcement organisations or the Courts, or we are legally required to hold donor transaction details for Gift Aid or accounting/tax purposes.
- **We have a legitimate interest.** For example, where it is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you).

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

- Sending direct marketing material to supporters by post for fundraising purposes.
- Conducting research to better understand who our supporters are and better target our fundraising activity.
- Measure and understand how our audiences respond to a variety of marketing activity so we can ensure our activity is well targeted, relevant and effective.
- Taking and using photos and/or films of event participants and attendees.
- Administering events.
- The use of CCTV recording equipment in and around our premises or events for monitoring and security purposes.
- Promoting Nottinghamshire Hospice on social media, Google, YouTube and other online platforms.

To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of your personal data, the nature of the personal data, and the impact of the processing on you.

Or on rarer occasions:

- Where we need to protect your vital interests (or someone else's interests); and/or,
- Where it is needed in the public interest or for official purposes.

## The type of personal information we collect

To be able to provide you with services and support from Nottinghamshire Hospice, we must process your personal data. The type of personal data we collect depends on the way you interact and use Nottinghamshire Hospice services. For example, accessing services as a Nottinghamshire Hospice donor will be a different experience from interacting with us as a patient.

We currently collect and process the following information:

- Identity Data: your first and last names.
- Contact Data: your address, telephone number, and email address.
- Donor Data: information that you provide when donating to the organisation. This includes your donation details and financial information.
- Information as to whether you are a taxpayer so that we can claim Gift Aid.
- Financial and business information for order and invoicing purposes.
- Information about your home and family situation, e.g. any caring obligations you or your family may have, or have had. This may include information relating to specific legal arrangements such as Lasting Power of Attorney.
- Information about how you use our services and the support we have provided to you.
- Data relating to how you support or engage with our team and organisation.
- Legacy information: information relating to a legacy you may be leaving to the organisation.
- Information relating to your identity where we are required by law to collect this in order to comply with regulations such as Safeguarding and Health and Safety.
- Information relating to your purchases from one of our shops, this may also include delivery information.
- Your communications with us, including a record of the email correspondence created when you contact us.

## Special Categories of Personal Data

Some categories of personal information are regarded by the law as more sensitive than others. This is known as 'special category' or 'sensitive personal data' and covers things like information about your health, ethnic origin, religious beliefs, political opinions or any genetic or biometric data that is used to identify you.

Depending on how and why we have your information, sensitive information may be processed for monitoring equal opportunities, managing health and safety obligations, managing our safeguarding obligations - among other reasons. The information you choose to share with us may consist of special category personal data comprising details of any disability or other health information you wish to share with us.

We do not usually collect 'sensitive personal data' about our supporters, unless there is a specific and clear reason for doing so, such as participation in an event where we need this information to ensure that we provide appropriate facilities or medical support to enable you to safely participate.

We may also collect sensitive personal data if you make the information public or if you tell us about your experiences relating to our services (for example, if you agree to act as a case study for us).

We will always make it clear when we collect this information from you what sensitive personal data we are collecting and why.

## How we analyse your information and create profiles to help our fundraising

Here at Nottinghamshire Hospice, our support and care services are often only made possible thanks to the generosity of our amazing supporters, volunteers and donors. It is therefore vital that our fundraising efforts are as effective as they can be.

By developing a better understanding of our audiences and supporters through careful research and using publicly available sources, we can tailor and target our fundraising events, communications and volunteering opportunities to those most likely to be interested in them. This allows us to be more efficient and cost-effective with our resources, and also reduces the risk of someone receiving information from us that they might find irrelevant, intrusive or even distressing.

In order to identify which people might benefit from a more personal approach, before contacting you, we may use careful and responsible data analysis to collect and review your data. This is so we can decide how likely you are to be interested in - or responsive to - a particular campaign, fundraising message, to become a donor or maybe a volunteer fundraiser. As part of this process, we may screen fundraising databases with the help of trusted partners.

Where we identify that you may have the capacity and/or affinity to support our organisation, we may collect additional information about you to build a more personalised profile. This will assist us in engaging with you in a more personalised way.

We use data which has been provided directly to us and combine this with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a meaningful understanding of someone's interests and support of our messaging. We only use reputable sources, where someone would expect their information may be read by the public. We take extra care to avoid any data that we believe has not been lawfully or ethically obtained, and we do not use information sources which have not been made public.

If you would rather we did not use your personal data in any wealth profiling, then please let us know.

Please note that before seeking or accepting major donations, we are required to conduct a minimum level of due diligence. This is in accordance with our legal and regulatory obligations and our internal risk management policies and procedures. This means that if you opt out of analysis of your data, we may still conduct some analysis that is required to enable us to accept donations from you.

## Information sharing

Where necessary, and in accordance with data protection legislation, we share information internally within Nottinghamshire Hospice and with third parties. This is as required and where we have a legal basis to do so.

We share information where there is a legal, regulatory or professional obligation to disclose your personal information, in order to apply the relevant rules and/or to protect the rights or safety of our employees past and present.

We may also be required to share information with Statutory and Regulatory authorities, law enforcement agencies and courts, or in the event of a transfer or acquisition of all or part of our organisation.

Sometimes we might share your data with third parties. This could include:

- Engaging third-party service providers to perform a variety of business operations on our behalf. For example, service providers we use for specific purposes, such as for our IT systems, legal counsel for the provision of legal advice and guidance.
- Third parties for whom we supply services. For example, the Local Authority, or the NHS.
- Regulatory authorities, law enforcement agencies and courts.
- In the event of a sale of all or a part of our organisation, the buyer and its professional advisers.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or to protect the rights, property, or safety of our company, our clients, employees, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Third party (sub-processor) organisations

For our general day to day data processing activities, we use third party organisations or systems to help us administer, deliver and monitor the services we provide:

- For the provision of IT and software services (e.g. Microsoft who provide our office software) to enable the management of the charity and office administration.
- For financial transactions and accounting.
- For occupational health support provision.
- To help us improve our organisation.
- For the administration of our website and online platforms.



- For any legal and regulatory guidance in the provision of our services.

Access to your personal information is only allowed when required by the law or is required as part of fulfilling our service obligations. We do not, and will never, sell your personal information to other third parties.

### International transfers

Where we have partners and service providers based outside of the UK (e.g. Microsoft for our IT Services), your personal data may be accessed or otherwise processed in other countries. We have implemented measures and safeguards to ensure that any transfer of data is compliant with our data protection laws.

For example, we ensure that Standard Contractual Clauses or International Data Transfer Agreements are approved by the Information Commissioners Office (ICO) and the UK Government and/or European Commission. We also carry out a detailed assessment to ensure the companies receiving your data can comply with these Clauses. Please contact us if you wish to know more.

### Keeping your information safe and secure.

We are committed to keeping personal information secure to protect it from being inappropriately or accidentally accessed, used, shared or destroyed -and against it being lost. We take organisational measures to keep information secure and provide regular training for staff on data protection. We endeavour to ensure that our suppliers take similar steps to keep your data secure.

### How long we keep your data

We will only keep your information for as long as necessary to perform our obligations and to fulfil the original processing purpose. Based on the legal basis we may need to keep some information for longer i.e., to comply with tax and accounting law and in some cases, we will anonymise your information so that it can no longer be associated with you.

When establishing our Retention Schedule, we consider the legal basis, sensitivity of information, the type of information, and - once the retention period has ended - how we deal with the information.

### Keeping your data correct

We are committed to keeping your information up to date. If you believe that we have made an error, then please contact us as we have outlined below, and we will use reasonable endeavours to carry out a correction.



## Your data protection rights

Under data protection law, you have rights including:

- **Your right of access.** You have the right to ask us for copies of your personal information.
- **Your right to rectification.** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure.** In certain circumstances, you have the right to ask us to erase your personal information.
- **Your right to restriction of processing.** In certain circumstances, you have the right to ask us to restrict the processing of your personal information.
- **Your right to object to processing.** In certain circumstances, you have the right to object to the processing of your personal information.
- **Your right to data portability.** In certain circumstances, you have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your rights in relation to automated decision making and profiling.** As a matter of principle, you have the right not to be subject to a decision based solely on automated processing, including profiling. However, we may automate such a decision if it is necessary for the entering into - or performance of - a contract between us, authorised by law or regulation or if you have given your explicit consent. However, we do not currently make any decisions by automated means.

You are not usually required to pay any charge for exercising your rights. If you make a request, we have a calendar month to respond to you.

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may charge a reasonable fee that takes into account the administrative costs of providing the information. Or we may also refuse to provide the information. Where we refuse a request, we will explain our reasons for the refusal and remind you of your right to complain.

If you would like further information on your rights or wish to exercise them, please email [info@nottshospice.org](mailto:info@nottshospice.org) or write to: Nottinghamshire Hospice, 384 Woodborough Road, Nottingham, NG3 4JF.

## Who to contact should you wish to make a request, ask a question or complain

You can contact us in the following ways:

- Email [info@nottshospice.org](mailto:info@nottshospice.org)
- Telephone [0115 910 1008](tel:0115 910 1008), or

- Write to us at our registered office (set out above).

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at:

Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or [ico.org.uk/make-a-complaint/](https://ico.org.uk/make-a-complaint/)

### Changes to this policy

We'll amend this privacy policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. Please check back regularly to see if there have been any updates.

This Privacy Policy was last updated in October 2024.