

The Papworth Trust

Income Generation (Fundraising)

Privacy Notice

Issued: 10TH September 2024

Version: 1.0

Review History

Date	Version	Amendments and Comments	Owner(s)
1	1.1	Initial draft.	

Papworth Trust Fundraising Privacy Notice

Who we are.

When we say 'we' or 'us' in this notice, we are referring to The Papworth Trust, also referred to as, 'the Trust'. We are registered with Companies House under company number 00148906. We are also a charity with registered charity number 211234. Our registered office is at Saxongate Bradbury Place, Hartford Road, Huntington, Cambridgeshire PE29 3RR.

The contact details for the Data Protection Officer are:

Sarah Brown 01480 357273 email: Dataprotection@papworthtrust.org.uk

We are committed to protecting your rights and freedoms with regards to your personal data. This notice explains how we collect, store, use, and share personal information of our employees and those individuals going through a recruitment process to become employees. It also explains the rights you have in relation to the personal information that we hold about you.

What kinds of data do we collect about you and why?

Your personal data will only be processed where it is necessary:

- To process your donation transaction - this where necessary to ensure appropriate security checks to prevent against fraud, to process gift aid, to acknowledge receipt of your payment and to assign to specific funds or projects (necessary for performance of a contract with you)
- Where there is a legal requirement, for example, where we are required by law to share your personal details with HMRC or financial regulatory bodies.
- To respond to or fulfil any requests, complaints or queries you make to us.
- To process payments and register you when you sign up to our services?
- To inform our work on developing the Code of Fundraising Practise, policies and guidance by conducting consultations and analysing the results.
- To understand how we can improve our services or information by conducting analysis and market research.
- To carry out fraud prevention and money laundering checks.
- Where there is a strong legitimate interest to do so, such as to invite you to a VIP event connected with your donation, to undertake due diligence in relation to a large donation or to thank you for your support. Where we rely on legitimate interest in relation to marketing, we will always provide an option to opt out of future marketing communications from RCPCH in every communication we send

- Where you have consented by opting into marketing from Papworth Trust. You can opt out at any time, see the below section on 'How can I access the information you hold about me?' for more details.

Where we receive a legacy, we will only communicate with the donor and executors/solicitors as required to process the legacy, unless we have consent to further communicate with you.

If you have donated through the JustGiving website or any other fundraising platform, please see [their privacy notice](#) to find out more about how they process your data.

Information you give us directly.

For example, we may obtain information about you when you register, take part in one of our events, supply goods and services, or contact us about campaigns or policies.

Information you give us indirectly.

Your personal information may be shared with us by third parties, which might include subcontractors acting on our behalf who provide us with technical, payment or delivery services.

You should check any privacy policy provided to you where you give your data to a third party.

Social Media

When you interact with us on social media platforms such as Facebook or Twitter, we may obtain information about you (for example when you publicly tag us in an event photo) The information we receive will depend on the privacy reference you have set on those types of platforms.

What type of personal information is collected from you?

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

- Your name contact details (including postal address, email address and telephone number)
- Information about your activities on our website and about the device used to access it for instance your IP address. Please visit the Papworth Trust Privacy notice on our website:
- Any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity, and religion. We do not usually collect sensitive 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 provide you with the opportunity to provide information on your ethnicity, sexual orientation, religion, and any disability, so that we can monitor and ensure the effective delivery of our services. Where appropriate, we will make clear why we are collecting this type of personal information and what it will be used for.

Who do we share your information with?

Papworth Trust works with Given Gain, Enthuse and Just Giving will disclose information to a third party where they have a legal requirement to do so, such as for gift aid or because they have a regulatory requirement to do so.

JustGiving, Given Gain and Enthuse also share information with carefully selected partners - to find out more please read **the** following Privacy Notices detailed below.

If you would like to make a request to any of these organisations in relation to the information they process about you, please visit the links below for their contact details.

[JustGiving privacy policy,](#)

[Privacy Notice - Enthuse: Branded fundraising for charities,](#)

[Privacy \(givengain.com\)](#)

Your personal data will be transferred outside of the European Economic Area (EEA) if you donate via the JustGiving website. To ensure you receive the same level of protection for your data, they will either rely on an adequacy decision, or have European Union (EU) standard contract clauses or binding corporate rules in place. For more information, read the [JustGiving privacy policy](#).

How can I access the information you hold about me?

Where we are processing your data with consent, such as for marketing purposes, you can withdraw consent at any time by contacting us on fundraising@papworthtrust.org.uk

You also have additional rights in relation to the information we hold about you. You can ask us to delete your personal data, change any inaccuracies, restrict what we use your personal data for or ask us to stop processing your

data. You can also request that the data we hold about you is given back to you or given to another service provider in a commonly used format. This is called data portability. You are entitled to request a copy of the information we hold about you. Some of these rights only apply in certain circumstances, but we will be able to advise you of this if you contact us.

To find out more about your rights, visit [the Information Commissioners Office \(ICO\) website](#) or to make a request please contact the Data Protection Officer by emailing: dataprotection@papworthtrust.org.uk or by writing to the address in the 'who we are' section, addressed to the 'Data Protection Officer'.

In accordance with Data Protection Legislation, we have a legal duty to protect any information we collect from you, and we have measures in place to ensure your data is securely and safely stored. You do have the right to complain to the ICO if you have concerns about the way your personal data is being handled: casework@ico.org.uk.

Keeping your personal data

It is your responsibility to update us of any changes to the personal information you have provided. You can update your details at any time by contact us: email address.

We are legally required to keep information relating to your donation and gift aid for 7 years in line with Income Tax Act 2007 sections 413 to 430 but this will be non-personal information unless the amount is over £10,000

If you have consented to marketing, your information will be retained permanently as a record of consent/non-consent but will be suppressed if you opt out of marketing so that only essential information is retained to be able to record your opt out.

We may also keep anonymised data for longer as evidence of funding and as required by funders and for future research and analysis.

If you have donated via the JustGiving, Given Gain or Enthuse Platforms, please visit their Privacy notices listed below to see more information on how long they will retain your personal data.

Lawful basis for processing your personal data.

Depending on the processing activity, we rely on the following lawful bases for processing your personal data under the GDPR:

- Article 6(1)(a) which relates to having your freely given consent.
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.

- Article 6(1)(c) so we can comply with our legal obligations.
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest.

Appropriate Policy Document

In processing your personal data we undertake to do so in a manner which complies with the data protection principles listed under Article 5 UK GDPR. These require that personal data be:

1. Processed lawfully, fairly and transparently (lawfulness, transparency and fairness) .
2. Collected for specified, explicit and legitimate purposes, and not further processed in a way which is incompatible with those purposes (purpose limitation).
3. Adequate, relevant and not excessive in relation to the purposes for which it is processed (data minimisation).
4. Accurate and where necessary kept up to date (accuracy).
5. Kept for no longer than is necessary for the purposes for which it is processed (storage limitation).
6. Processed in a way that ensures appropriate security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (security - integrity and confidentiality).
7. We will undertake to be responsible for complying with the above principles (accountability).

Purpose Limitation

Processing of special category data will be restricted to only that which is necessary for the relevant purpose, and it will not be used for another purpose unless that use is otherwise authorised. We will outline the purposes identified in this document.

Data Minimisation

We will limit the amount of data (including special category and criminal conviction data) that is collected and ensure that it is collected only for the purpose identified. We will adhere to the terms of our retention schedules so that we will delete that data which we do not need.

Accuracy

We will ensure as far as possible that the data we hold is accurate and kept up to date and will record the source of the data. In some circumstances we may need to keep factually inaccurate information e.g. if a grievance is raised during the recruitment process. Checks are carried out on the accuracy of data during audits and line manager checks. Personal data found to be inaccurate will be rectified or erased whenever possible. Where this is not possible, there will be an addendum to that personal data advising of the inaccuracy. If inaccurate personal data has been disclosed, the recipient will be advised of this as soon as practicable.

Storage Limitation

We have considered the length of time we should keep personal data (including special category and criminal conviction data) we maintain a retention schedule which dictates the length of time personal data should be kept in certain circumstances. All processing of special category and criminal conviction data will be dealt with under the schedule. When an individual withdraws consent to the processing of special category data (in the unusual circumstances where consent has been previously requested and provided by the individual), that data will be destroyed in line with requirements under the UK GDPR (see below regarding your right to object).

In the event of a candidate being unsuccessful we will delete their personal data after six months.

Security

We have developed and implemented certain technical and organisational measures to protect against unauthorised or unlawful processing and also against accidental loss, destruction or damage. We employ such security measures as encryption, firewalls, anti-virus software, IT health checks, vulnerability assessment and penetration process, user authentication, role based and password-controlled access, technical assurance and technical audits. All staff are required to undertake mandatory data protection training.

Accountability

We will review this document regularly and at least every two years to ensure we adhere to the above principles. We have set out below your rights and how to exercise them.

How long we keep your personal data.

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collect it, including for the purposes of satisfying any legal, insurance, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk or harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, insurance and compliance requirements. We tend only to retain candidate data, for unsuccessful candidate for around six months.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with our data retention policy, considering applicable laws and regulations, where we no longer have a legitimate reason for retaining it.

We will also base any retention decisions on criteria, including:

- Any legal or regulatory requirements to delete or retain the data for a specific timeframe.
- Our legitimate business reasons for keeping the data, such as to analyse and assess our activities. This includes assessing the fairness of our recruitment practices.
- The likelihood of a claim arising where we would need to defend our conduct.
- Whether the data is likely to remain up to date.

Data sharing

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors.

We may have to share your data with other third parties, including third-party service providers. We require third parties to respect the security of your data and treat it in accordance with data protection laws. If we do share data, you are entitled to expect that third party to apply a similar level of protection in respect of your personal information.

The Trust, or its service providers, share your personal data with third parties when:

- required by law;
- requested by a regulator;
- necessary to manage its working relationship with you;
- it is in the public interest to do so;
- necessary for the performance of its services;
- contacted by a new or prospective employer for a confidential employment reference; or
- necessary for fraud and data error investigations.

The third parties include service providers, contractors, agents, and other government bodies.

Third party	Purpose
Just Giving, Given Gain and Enthuse	All of these organisations are fundraising platforms to enable charities and fundraisers raise more money raising public awareness quickly and make a cause visible to a large audience.
Charity Commission, Homes England and the Care and Qualities Commission.	Regulatory requirements
External auditors	Variety of audit checks to assure compliance with process/policy

All our third-party service providers are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the Trust or where we are under a duty to disclose or share your personal data to comply with any legal obligation; or to protect the rights, property, or safety of the Trust, our customers, or others.

Security of your Data

The Trust has implemented specific measures such as admission controls, system access controls, data access controls, transmission controls, input controls, job controls, availability controls, and segregation controls to ensure adequate protection of personal data. This includes specific measures such as the use of anti-virus applications, proper training protocols, systematic access management, and DDoS mitigation technologies].

The Company's approach to protect the integrity of the data includes, but is not limited to, technical and organisational measures such as proper system administration, regular backup procedures, the use of authentication codes, signature procedures, network controls, and proper training of employees and relevant third parties

Your rights

There are several rights available to people under the UK GDPR. These include:

- Access to your data and information about what data we hold, its source and the purposes of processing your data.

- Rectification of your data where it is inaccurate.
- The right to be forgotten / to request that data is deleted.
- The right to restrict the processing of data.
- Data portability.
- The right to object.
- Rights relating to automated decision-making.
- You can find more information on these rights below. If you wish to exercise one of your rights, please contact our Data Protection Officer at dataprotection@papworthtrust.org.uk or write to us at:

1 Saxongate,
Bradbury Place,
Huntingdon,
Cambridgeshire, PE29 3RR.
01480 357200

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as to have access to and receive copies of the data we hold about you. This right also include being provided information on the categories of data held, the sources of any data we process and information on who this is shared with or sold to – for ease we have included most of this information within this privacy policy.

We will provide the information you request as soon as possible and in any event within one calendar month of receiving your request unless we require to extend it in line with the provisions under the UK GDPR. If we need more information to comply with your request, we will let you know.

2. Rectification (correction) of your data

If you believe personal data, we hold about you is inaccurate or incomplete, you can ask us to rectify it. We will make the correction within one month, unless we do not feel the change is appropriate for us to make, in that case, we will let you know why. We will also let you know if we need more time to comply with your request.

3. Right to be forgotten (erasure)

In some circumstances, you have the right to ask us to delete the personal data we hold about you when:

- We no longer need your personal data for the purpose for which we collected it.
- We have collected your personal data on the grounds of consent (or the condition of explicit consent) and you withdraw that consent.
- You object to the processing, and we do not have any overriding legitimate interests to continue processing the data about you.
- We have unlawfully processed your personal data (i.e., we have failed to comply with the UK-GDPR).
- The personal data must be deleted to comply with a legal obligation.

There are certain situations in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

4. Right to restrict processing

In some circumstances, you are entitled to ask us to stop processing your personal data. But, while this means we must stop actively processing your personal data, we do not have to delete it. This right is available if:

- You believe the personal data we hold is not accurate – we will cease processing it until we can verify its accuracy.
- You have objected to us processing the data – we will stop processing it until we have determined whether our legitimate interests override your objection.
- If the processing is unlawful.
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise, or defend a legal claim.

5. Data portability

Where the Trust acts as a data controller, you have the right to ask us to provide your personal data in a structured, commonly- used and machine-readable format so that you can transfer the personal data to another data controller. This right only applies:

- To personal data you provide to us.
- When processing is based on your consent or for performance of a contract (i.e., the right does not apply if we process your personal data on the grounds of legitimate interests).
- If the processing is automated.

We will respond to your request as soon as possible and in any event within one calendar month. If we need more time, we will let you know.

6. Right to object

You are entitled to officially object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority.
- For direct marketing purposes (including profiling).
- For the purposes of scientific or historical research and statistics.

We will stop processing your data if you have grounds for objecting unless we can show that there are legitimate compelling grounds that override your interests, rights, and freedoms or the processing is for the establishment, exercise, or defence of legal claims.

7. Rights related to automated decision-making including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.

For something to be solely automated there must be no human involvement in the decision-making process. The restriction only covers solely automated individual decision-making that produces legal or similarly significant effects. A legal effect is something that affects your legal rights. In these cases, you can request that human intervention or human involvement be used as part of the decision-making process. Furthermore, you can request information about the logic involved in the decision-

making process, as well as the significance and the envisaged consequences of any decisions made. We do not envisage that this type of decision-making will take place.

Changes to this Privacy Notice

We may update this notice at any time. This notice shall be made available on our website. Updates to this notice shall be made to this page and, where appropriate, notified to you.

Please check back frequently to see any updates or changes.

Contact

Questions, comments and requests regarding this privacy notice and your individual rights are welcomed. To contact us on these matters, or for any other data protection concerns or issues, please use the following details:

- by email:
dataprotection@papworthtrust.org.uk
- in writing to:
1 Saxongate,
Bradbury Place,
Huntingdon,
Cambridgeshire, PE29 3RR.
01480 357200

Complaints and Concerns

If you have any concerns about the ways in which we process your personal data, you have a right to complain to the Information Commissioner's Office. We would encourage you to contact us first, so we can address your concerns.

The Information Commissioner's Office can be reached using the following details:

- through their website: <https://ico.org.uk/>
- by telephone: 0303 123 1113
- in writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF