

PRIVACY POLICY FOR WEBSITE

Last review:	September 2022
Update by:	September 2024
Approved by Chair:	

A Company Limited by Guarantee Registered in England & Wales No. 04041290 Registered Charity No. 1082297

PRIVACY POLICY FOR WEBSITE

Our Privacy Policy covers what kinds of information we collect, why we collect it, legal grounds, how we store it, how you can manage your information, young and/or vulnerable people, what information we share and changes in our Privacy Policy.

Effective date:... September 2022

Carers Trust Hillingdon promises to respect and protect the personal information (or data) you or your family have provided us with or that we get from other organisations and to keep it safe. We will manage this data effectively and securely so that we can deliver better services to and for you, including our fundraising activities.

We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information. This policy will outline what kinds of data we collect, why we collect it, how we will use, share, and store it, what your rights are, and how you can contact us to manage, edit or delete this information. You can request a printed (or large print) copy of this privacy policy by contacting us at the address, telephone or email address below.

If you need to contact us, regarding your personal data or information, or for any other issue, please write to Carers Trust Hillingdon, Luther Bouch House, 126 High Street, Uxbridge UB8 1JT, call 01895 811206 (charged at local rates) or email: office@carerstrusthillingdon.org

Who we are

Carers Trust Hillingdon works to improve support, services and recognition for anyone living in the London Borough of Hillingdon with the challenges of caring, unpaid, for a family member or friend who is ill, frail, disabled or has mental health or addiction problems.

What kinds of information do we collect?

Carers Trust Hillingdon may collect different types of personal data directly from or about you depending on the activities or services we are offering and that you are taking part in or using. This can include your name, address, telephone number, email, date of birth, data relating to your personal and caring situations, religion, medical data (if pertinent to the activities or services), and some financial data if you are giving us a donation or receiving a financial grant from us. You may provide us with any or all of this data online, at an event, on paper or over the phone through a donation form, a sign up form (if requesting information or asking to be put on a mailing list), or by registering for and/or attending an event.

If you are accessing our webpages we may also receive some analytical data from our Internet and webpage service providers. This is anonymous data such as IP addresses, pages visited and time spent on the website. If you are using Carers Trust Hillingdon secure online donation pages you are routed through to our online

donations service provider and the data you give (such as your credit card, bank and/or contact details) is supplied to us so that the transaction can take place.

In some cases, anonymous internet and website data is collected using cookies. Cookies are small pieces of data sent by a web server to collect data from a web browser. It also allows a website to recognise a user and their setting preferences the next time they visit the website and may allow some features to load more quickly. Most browsers will allow you to turn off or manage cookies. Please note that turning off or refusing to allow cookies for the Carers Trust Hillingdon website can restrict your use of the website. Please click here to read our Cookie Policy.

We may also receive some information about you from other organisations, from events and activities. This can include data collected from our partner organisations, other charities and some health and social care, education or government services. It might also include data from social media and messaging sources (e.g. Facebook, Twitter, and LinkedIn) depending on your settings, the source's own privacy policies, or the permissions you have granted us to access the data available through your account or publicly available comments.

Why do we collect this information and how will we use it?

We collect this data so that we can carry out our work and develop a better understanding of the people we support and who support us. It allows us to make better decisions, fundraise more effectively and efficiently, and to provide better communications about Carers Trust Hillingdon of interest to you, including about our work, current and future activities, and our awareness, policy and fundraising campaigns.

Data collected from surveys and research that you may have taken part in helps us to improve our services, activities and resources for unpaid carers and provides evidence to support our awareness and lobbying campaigns. Unless you have given us clear permission otherwise, this is presented as anonymous or collective data. Some types of information or data are considered 'sensitive' under data protection regulations. This includes information like health/medical data, race, religious beliefs and political opinions. We will not normally collect this data unless it is necessary for the activity or service you are taking part in or using and you give us your permission to hold this data in our databases and records.

We will use the data you provide to us to process your donations or to respond to your information requests. We may use data that we hold about you, gathered through our relationship with you, to contact you with communications and marketing by post, phone or email about awareness, policy and fundraising campaigns. It may be used to personalise our contact with you or the activities or services you are taking part in. It will also be used to administer our records.

Legal grounds and Legitimate Interest

When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal grounds available to us under Data Protection law.

One of these is where we have obtained your consent to use your information for a previously notified purpose, such as to send you email/text marketing or to provide you with a product, service or information at your request.

Another is where we have a legal obligation to use or disclose information about you – for instance, where we are ordered by a court or regulatory authority or we are legally required to hold donor transaction details for Gift Aid or accounting/tax purposes.

Another is where we have an obligation to hold data for the necessary performance of a contract or for the purpose of fulfilling our responsibilities in relation to staff and volunteers.

In certain instances, we may collect and use personal information where this is necessary in our legitimate interest as a charity, this includes being able to:

- send direct marketing material to supporters by post or contacting them by telephone for fundraising purposes (subject to checking against the Telephone Preference Service and any existing marketing preferences). See more at Marketing materials below;
- conduct research to better understand who our supporters are and better target our fundraising activity. See more at <u>Fundraising</u> below;
- monitor who we deal with to protect our charity against fraud, money laundering and other risks;
- maintain and administer our donor database and systems.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Policy and that does not intrude on your privacy or previously expressed marketing preferences.

Where we process sensitive personal data (as mentioned above), we will make sure that we only do so in accordance with one of the additional lawful grounds for processing such as where we have your explicit consent or you have made that information manifestly public. When we do this, we will tell you what sensitive personal data we are collecting and why.

Marketing materials

We want to ensure you receive the level of information about Carers Trust Hillingdon that is right for you.

Email/text marketing

If you actively provide your consent to us along with your email address and/or mobile phone number, we may contact you for marketing purposes by email or text message. By subscribing to Carers Trust Hillingdon emails or opting in to email communication from Carers Trust Hillingdon , you grant us the right to use the email for email marketing purposes.

Post/telephone marketing

If you have provided us with your postal address or telephone number we may send you direct mail or telephone you about our work if you have consented to receive such communications. If you have made a donation, signed up to hear from us or otherwise asked us for information, in the period between May 2016 and May 2018, and not opted out of communication from us, we may still contact you by post, see Legal basis and Legitimate Interests.

We actively check telephone numbers against the Telephone Preference Service and will only make telephone calls to you where your telephone number is listed on the TPS if you have specifically told us that you do not object to such calls and have consented to receive them.

Your choice

It is always your choice as to whether you want to receive information about our work, 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 collect your data.

You may opt-out of our marketing communications at any time by clicking the 'unsubscribe' link at the end of our marketing emails or sending us an "opt-out" text message, following the instructions we provide you in our initial text.

You can also change any of your contact preferences at any time (including telling us that you don't want us to contact you for marketing purposes by telephone, or by post) by contacting us at 01895 811206 (charged at local rates) or email office@carerstrusthillingdon.org

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted by us for such purposes. However, we may retain your details on a suppression list to help ensure that we do not continue to contact you.

Fundraising

We carry out targeted fundraising activity to ensure that we are contacting you with the most appropriate communication, which is relevant and timely for you. To do this, we may use profiling techniques to gather general data about you and your lifestyle which you have already volunteered or made publicly available.

This activity assists us in understanding the background of the people who support us and helps us to make appropriate requests to supporters who may have the means and the desire to give more. You can opt out of your data being used for fundraising techniques by contacting call 01895 811206 (charged at local rates) or email office@carerstrusthillingdon.org

Whilst Carers Trust Hillingdon will take all reasonable precautions to safeguard data or information transmissions over the internet, these transmissions cannot be guaranteed to be 100% secure. Any transmission of your data to Carers Trust Hillingdon through internet channels is at your own risk.

How do we store and dispose of this information and for how long do we keep it?

Carers Trust Hillingdon takes appropriate actions to make sure that the data we hold about you, whether that is on paper or electronically in a computer file or database, is stored securely. We will only hold this data for as long as it is necessary for the purposes for which it is provided to us. We will dispose of unnecessary personal data using secure deletion methods (electronic) or shredding. We will contact you periodically (at least every 4 years) to confirm that the data we hold about you is accurate and up-to-date and that we may continue to contact you. We will then update our records accordingly.

How can I manage or delete the information you have about me?

Your rights regarding the data we hold and collect about you are outlined in the data protection policies and legislation of the United Kingdom and, from 25 May 2018, the European Union. These include: the right to access, edit and update, request the deletion of, and restrict the processing of your personal information, the right to object to the collection of your personal data and the right to lodge a complaint with a supervisory authority about your personal information.

If you would like to find out what personal information/data we hold about you, delete any of this data, (e.g. remove your name from any of our mailing lists), or update your communication preferences please contact us on 01895 811206 (charged at local rates) or email office@carerstrusthillingdon.org

If you have any questions or comments about this Privacy Policy or any of the policies mentioned in this Policy, please contact our Data Protection Officer directly at:

Carers Trust Hillingdon, Luther Bouch House, 126 High Street, Uxbridge UB8 1JT, 01895 811206 office@carerstrusthilligndon.org

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO). You can contact the ICO on 0303 123 1113, at registration@ico.org.uk or at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Privacy and young and/or vulnerable people

This privacy policy applies to everyone, including those who are vulnerable, young people and children. To take part in an activity or service (including fundraising events) or provide any personal data to us, young people under the age of 13 must have permission or consent of a parent or guardian. Carers Trust Hillingdon will seek such consent where necessary. Carers Trust Hillingdon will proactively work to ensure vulnerable people also understand their data rights and any of their data we collect is managed appropriately according to data protection regulations.

What information do we share and with whom?

We will never **sell** your data to other organisations for their own marketing purposes. If we have your consent we may **share** your data with our partner organisations: The Alzheimer's Society Hillingdon; Harlington Care; Harlington Hospice and Hillingdon Mind, to deliver the Carers Services Contract for London Borough of Hillingdon.

We will undertake due diligence on these organisations and will require them to comply strictly with our instructions and data protection policies and legislation. We regularly monitor all our data processors.

We may also share your data in the following circumstances:

- Where we must comply with laws such as those for national security, taxation, or criminal investigations.
- Where we must undertake due diligence, to be sure we are not being used as a channel for criminal activities.

Links to external websites that are made available through the Carers Trust Hillingdon website or in any of our publications are for the purpose of convenience or citation. Carers Trust Hillingdon is not responsible for the content or privacy policies of these other pages. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

Changes in our Privacy Policy

We will notify you through a notice on our website, or in some cases directly by your preferred form of communication, of any significant changes to this Privacy Policy. This notice will be clearly highlighted on the www.carerstrusthillingdon.org website for a month after the changes have been made. The effective date of each update will be displayed at the beginning of this statement.

This Privacy Policy will be reviewed annually and Carers Trust Hillingdon reserves the right to modify this statement at any time.