

ADDITIONAL NOTES: Factsheet

Privacy Statement: With Whom, How and why we process personal data factsheet

Below is list of explanations of the different ways in which St Catherine's Hospice (SCH) may process personal data, with who, how and why we process data in that way and how long we may retain the data.

a) When making a donation or a payment to SCH

We will process your personal data when you make a donation or payment to us. We collect the necessary data to process and verify this transaction and set up a direct debit with your bank if you have chosen to give in this way.

Any payment details (such as credit or debit cards) we receive through our website are passed securely to our payment processing providers who meet the required Payment Card Industry (PCI) Security Standards.

We will retain information regarding your transaction (such as your name, contact details, and donation amount) for six years for internal audit purposes and in accordance with the Limitation Act (1980)

b) When enquiring about our activities or services

We will process your personal data when you contact us about our activities or services. Typically, this will involve processing your name and contact details in order to respond to you, or any other personal data you volunteer to us in your correspondence.

The amount of time we retain this information will vary depending on the nature of your query. It is likely we would retain this data for no more than two years in accordance with our email retention practice. It is possible we will retain this data for a longer period if you correspond with us on a regular basis or are contacting us in order to raise a complaint.

c) When we send administrative communications to you

We will process your personal data in order to communicate with you using the contact details you have provided for administrative purposes. This could be to administer a donation, provide you with information regarding a fundraising event you have asked to take part in, or in relation to Gift Aid claims.

d) When we send marketing communications to you

We will process your personal data in order to send you marketing communications where we have a lawful basis to do this.

Where we have collected your personal information because you've supported, or expressed an interest in SCH, we may send you direct marketing emails, unless you ask it not to.

We will seek your consent for any direct marketing by electronic means (e.g. email, telephone, or texts). We currently send the following marketing materials:

- (a) Updates about our work – including newsletters.
- (b) Campaigns – information about our campaigning activities and their progress.
- (c) Fundraising activities – including requests for donations, information about how you can leave us a gift in your will, and how you can take part in fundraising events or fundraise on our behalf, as well as the impact all of this has on our work
- (d) Events – including details of our challenge events and other sponsored activities. If you sign up to take part in an event, we will also send you administrative communications about how you can take part.
- (e) Shop products – including information about products offered by our online shop.
- (f) Volunteering – information about how you can get involved with volunteering for SCH.

We will also rely on our legitimate interest in order to send you postal marketing content when we collect your postal address from you unless you opt-out of receiving communications in this way.

You are in control of how we use your personal information for marketing and fundraising purposes and can update your preferences at any time by calling us on 01772 629171.

If you ask us to stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

We will retain your personal data for marketing communications for as long as we have an active supporter relationship with you. If you have not donated, volunteered, or otherwise been an active supporter of SCH then we will cease processing your personal data for marketing purposes six years from the date of your last activity with SCH.

Please note that we may retain your marketing preferences for a lifetime if you have registered with the Fundraising Preference Service in order to prevent marketing from all UK charities. This is so that we can ensure we never send marketing material to you per your request.

e) When you visit our website (About Cookies)

'Cookies' are small pieces of information stored on your computer or mobile device when you visit our website, to collect information and identify you. If you provide your consent for marketing and analytics cookies then we may use information about your use of the SCH website to help us analyse trends and, where it is lawful to do so, display SCH advertising to you on third-party websites.

For more information, please refer to our [Cookies notice](#).

f) When you fundraise, take part in an event, or meet with us

If you sign up to a SCH fundraising event, we will only process your data to the extent that we need to in order to facilitate the events you have signed up to and ensure your health and safety while attending the event.

We will also process your personal data in order to send marketing communications to you if you have agreed to this or where we have a legitimate interest in sending postal marketing material.

Occasionally we may need to ask for data regarding your health (such as food allergies) to ensure we maintain a safe environment.

We will typically process data only for as long as it is required for an event and for a short period thereafter (e.g. six months to a year). Depending on the activity, we may be legally required to retain information for up to six years.

g) When you volunteer with us

If you apply to be a volunteer with SCH, we will ask for your personal data as part of the application process. This will include your name, contact details, references, emergency contact details, information about unspent criminal convictions, and any relevant health and disability information we require in order to make sure we have a safe and welcoming environment.

We may also contact you about our work, events, and ways you can support us. Because you are applying to volunteer with us, you are engaging with our charitable purposes, so we may rely on the charitable soft opt-in to send you email or SMS updates about similar charitable activities. You can opt out at any time using the links in our messages or by contacting us

We will remove your record as an active volunteer from our system however we may retain certain data for up to six years.

h) When responding to a complaint

We will process your personal data in order to understand, investigate, and respond to a complaint you raise with us. SCH will process the minimum amount of personal data that is necessary to respond fully to your complaint and may ask you for further details where we require them.

SCH retains all complaint data for at least six years from the date your complaint has received a final response from us in accordance with the Limitation Act (1980).

EXCEPTION: SCH retains a record of clinical complaints and investigation for 8 years after death or discharge or completion of investigation if later in accordance with the Health and Social Care Act (2022).

i) Internal audits

We may process your personal data in the course of internal audits. We will only process the minimum amount of personal data in order to complete an audit or investigation.

j) When responding to a safeguarding concern

SCH may process your personal data in connection to a concern reported to our Safeguarding Team who in turn have a duty to inform the Local Authority (LCC). The amount of personal data processed will vary depending on the nature of the incident, but we will process the minimum amount of personal data that we need in order to ensure your safety and the safety of others.

The amount of time we will retain safeguarding reports will vary depending on the concern raised with us and will be assessed on a case-by-case basis. Typically, we will retain a safeguarding report for six years in line with the Limitation Act (1980) but the level risk posed to individuals will be our decisive consideration in determining a retention period.

If a safeguarding concern carries a high level of risk, then we may need to share information with the Police, or with another organisation if we are asked for a job reference from them.

k) When we may undertake Supporter Analysis, Profiling (and Wealth Analysis)

We may analyse the personal data supporters share with us in conjunction with other information that we obtain from publicly available sources and business sources. This may include information about your parliamentary constituency, census records, and business records. We rely on our Legitimate Interest to conduct analysis of the personal data supporters share with us.

We do this in order to gain insights into the people who support SCH, such as the approximate age, gender, and approximate household composition of SCH supporters. We also wish to understand the giving patterns of supporters. This analysis helps us to understand our audience more fully, tailor our communications appropriately, and improve the quality of our supporters' experience with us.

Wealth screening is the practice of using personal data to identify high profile and wealthy individuals who may be able to support our work in a greater capacity. Please note however that SCH does not currently undertake Wealth Analysis. This is an area we are investigating.

You can opt out of your data being used in any of the ways described in this section at any time. Please call us on 01772 629171.

l) When we use advertising audiences and audience modelling

We may use personal information provided by supporters, donors, volunteers, event participants and individuals who have subscribed to receive marketing communications from us to create audiences on advertising platforms such as Meta (Facebook and Instagram).

This may involve securely matching information, such as email addresses or telephone numbers, with user accounts on these platforms so that we can:

- share relevant information about our services, fundraising activities, events and volunteering opportunities;
- reduce the likelihood of showing advertisements to individuals who have asked not to receive marketing communications; and
- create audience models (sometimes known as "Lookalike Audiences") to help us reach people who may have an interest in supporting St Catherine's Hospice.

Where possible, personal information is securely hashed before matching takes place. We will only undertake this processing where we have an appropriate lawful basis and individuals have the right to object to this processing at any time.

We do not use patient clinical records or healthcare information for advertising audience creation.

m) When we contact the Next of Kin

We use information we collect to administer bereavement processes, provide support to families, manage hospice records, respond to enquiries, comply with our legal obligations, and communicate with next of kin about our remembrance events, fundraising activities, and lottery products where appropriate.

If you would prefer not to receive these communications, please let us know at any time and we will update your preferences promptly.

n) When you provide personal data indirectly

We may obtain your data when it is shared with us by third parties such as professional fundraisers e.g. SEC Fundraising or through fundraising sites such as JustGiving or Virgin Money. These organisations will have their own privacy policies, and/or statements so please do ensure you check when providing your personal information to them.

We always carry out due diligence on organisations who provide personal data to us to ensure it is lawful and secure. Please note that SCH **never** buys or sells personal data.

o) When you have given other organisations permission to share it

You may have provided your details to another organisation that works with SCH e.g. in order to sign up to the lottery or to purchase tickets for an event. However, when working with other organisations, we work to ensure it's completely clear to you that your information will be shared with SCH.

Your healthcare details may be shared with other healthcare professionals unless you have explicitly stated that you do not want to share that information. This information is referred to in the 'Your Stay at St Catherine's Hospice' leaflet which is handed to patients or their families on admission.

p) When you use social media

When you interact with us on social media (such as Facebook, Instagram, or X), we use your username or handle to communicate with you. Depending on your privacy settings and platform terms, we may also access your profile data for marketing and fundraising purposes.

We sometimes use Meta Lead Ads (Facebook and Instagram) to make it easier for you to learn about our services, events, and fundraising activities. If you submit a form through one of these ads, Meta shares your provided information with us so we can respond to your enquiry.

What we collect is typically, your name, email address, telephone number, and any details you include in the form. We never ask for or collect health information through Meta Lead Ads.

Our lawful basis for this processing is our legitimate interests in promoting our charitable work and responding to people who ask for information. Where you choose to receive marketing updates from us, our lawful basis is your consent. You can withdraw this at any time.

q) When we guess business e-mail addresses

Where we have a legitimate interest and feel that an organisation would want to hear from us about supporting SCH, we may source information from third parties that will help us to contact individuals in relevant roles acting on behalf of those organisations. We will use this information in order to guess business email addresses so that we can contact the most relevant member of staff.

r) When we administer legacies

In the course of administering legacies gifted to SCH we may obtain the personal information of, for example, other beneficiaries to the will. We also work with third party probate specialists who provide us with this information.

s) When we create promotional material

When producing promotional material with personal data and images, SCH **must** remain compliant with data protection laws like UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR).

With your consent we may use your image in material promoting SCH in print or electronically. We may rely on legitimate interests as our lawful basis for using these images especially where it may be impractical or impossible to seek consent e.g. photographs from an event such as the Moonlight Walk or Santa Dash.

Ways we may collect and use personal data and images for promotional purposes that may be published, includes:

- Taking photographs during an event - we display notices explaining our position throughout a venue and a compare, where applicable, will communicate those instructions.
- Taking photographs and audio-visual footage with a patient or a patient family – we seek explicit consent and require our 'Consent to Photography & Audio-visual' form be completed.

You can withdraw your consent for use in promotional material and have the right to object to this processing. In these instances, SCH will take all reasonable steps to cease using your image with immediate effect, however it may not be possible to withdraw promotional material already released or in late stages of production.

t) When we process Special Category Data

Certain 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.

When processing Special Category Data is necessary for health or social care purposes and is carried out by, or under the responsibility of, a health professional from SCH we ensure that we have an appropriate lawful basis i.e. one of the following:

- Explicit consent or
- For reasons of public health e.g. Infection Prevention, or
- Can show it is necessary for research purposes.

We do not usually collect Special Category Data about our supporters unless there is a clear reason for doing so, such as participation in fundraising event where we need this information to ensure that we provide appropriate facilities or medical support to enable you to safely participate.

We will always make it clear what Special Category Data we are processing and why when we ask for this data.

u) When you apply for a job with SCH

If you apply to work at SCH, we will use the information you provide in your application in order to assess your suitability for the role you have applied for.

If you are unsuccessful in your job application, we may hold your personal information after we've finished recruiting for up to 12 months to deal with any follow up queries or issues.

We may keep statistical information about all applicants to develop our recruitment processes however no individual applicant would be identifiable from this information.

Successful applicants may also require a criminal background check e.g. Disclosure and Barring Service Check (DBS), and we work with a trusted organisation in order to facilitate these. All applicants will be advised of the need for a background check within the job advert and job pack information.

If you commence employment with SCH, your personal information will be processed in accordance with your employment contract and in accordance with internal SCH policies.

SCH may also process your personal data in order to provide a job reference regarding you where we are requested to provide this.

v) When we keep your information accurate and up to date

SCH has a responsibility to make sure all of the personal data it processes is accurate and up to date.

Where possible, we try to keep your records up to date; for example, using the Post Office's National Change of Address database. However, we really appreciate it if you let us know if your contact details change.

w) When using CCTV

SCH uses CCTV for security purposes or to meet its regulatory obligations. It is held for up to 90 days after which the data is deleted or overwritten.

CCTV in SCH car parks is primarily used for security.

CCTV used onsite is for compliance purposes only where we are obligated to monitor high-risk areas. We do not use CCTV for performance management purposes.

In both instances, we have visible signs that inform users that CCTV is operating, who operates it and the purpose of the surveillance.

x) When we record and share an online meeting, event or a lesson that we host

We will inform participants at the start of the meeting that they are being recorded and why we are recording.

We will only retain recordings for as long as necessary (SCH automatically deletes such records after 30 days). Recordings will be stored securely (e.g., within MS Teams, SharePoint, or password protected links).

y) When we record telephone calls

Telephone call recordings are activated when you contact St Catherine's Hospice (SCH), whether to seek advice using our Advice Line or to book an event or for general enquiries. When you telephone SCH, we will make it clear to you that the call is being recorded.

To record calls, SCH must have a lawful basis under UK GDPR and the Data Protection Act 2018, ensuring data is used fairly, stored safely, and processed with lawful authority such as consent, contract

or legitimate interests and calls are generally recorded for staff training, quality monitoring, dispute resolution, and employee safety.

z) Who are our named suppliers and processors list

For transparency, we maintain a full list of our current suppliers and processors, including the systems and apps we use, the purpose of each, and whether they act as controllers or processors.

Many of the systems we use are accessed through apps or online platforms. If an app processes personal data, it is treated as a supplier and included within the following categories.

- Clinical system providers – organisations that host or support our electronic patient record systems and clinical apps (SystemOne).
- IT hosting and infrastructure providers – including cloud storage, email, secure servers, and backup services.
- Fundraising platforms and donation processors – to process donations, manage supporter relationships, and administer Gift Aid (Donor Flex, JustGiving).
- HR, payroll and workforce systems – for recruitment, employment, volunteer management, and rota systems (IRIS Cascade).
- Retail and trading system providers – including till systems, stock management, and retail Gift Aid platforms (CHARiot Nysist).
- Website and digital service providers – such as website hosting, analytics tools, plug-ins, and online forms ((WordPress plug-ins, Google Analytics, Meta Lead Ads, Trello, Canva)
- Professional advisers – including auditors, legal advisers, and insurers.
- Regulators and public authorities – where required by law or to protect individuals from harm (CQC, Fundraising Regulator, Gambling Commission, ICO,) .
- Safeguarding partners – when necessary to protect children or vulnerable adults.
- Emergency services – where needed to protect life or safety.

aa) When we may use Automated decision-making and profiling

We do not make decisions about you based solely on automated processing that have legal or similarly significant effects. All decisions that affect your rights, employment, access to services, or financial position involve meaningful human involvement.

If we ever introduce automated decision-making, we will provide you with meaningful information about the logic involved, the significance and envisaged consequences, the lawful basis relied upon, and your rights to obtain human intervention, express your point of view, and contest the decision.

You also have the right to raise a complaint through our compliant complaints process, which we will acknowledge within 30 days.

bb) How we treat staff data

We collect staff data directly from you, through HR and payroll processes, through TABs and rota management tools, and through IT systems used in the course of your role.

We may also receive information from third parties such as recruitment agencies, referees, occupational health providers, and training bodies.

cc) What systems we use for Governance, Safety & Compliance

We use governance and safety systems provided by Vantage Technologies to record and manage incidents, complaints, risks, health and safety events, quality audits, subject access requests, research project documentation, staff driving records, and strategic and operational risks.

These systems help us investigate concerns, meet our legal and regulatory obligations, improve the safety and quality of our services, and ensure appropriate organisational oversight.

The information processed may include personal and special category data relating to patients, families, staff, volunteers, visitors, contractors, and research participants. Access to these records is strictly controlled and limited to authorised staff involved in governance, safety, compliance, and legal processes.

Vantage does not make automated decisions about individuals; all decisions are made with meaningful human involvement.

Data processed within Vantage is handled in line with our retention schedule, security measures, and compliant complaints process.

dd) When we undertake Clinical Assessments, Scoring Tools and Triage Processes

As part of providing safe, effective care, we use clinical assessments, scoring tools and triage processes to understand patient and carer needs, identify risks, and plan appropriate support. These include tools that help us assess symptoms, wellbeing, deterioration, and carer support needs.

These tools are clinician-led and are used to support professional judgement. They do not make decisions independently.