

Below is list of explanations of the different ways in which St Catherine's Hospice (SCH) may process personal data, and 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**

'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 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) 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 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.

### **m) 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.

#### **n) When you use social media**

When you interact with us on our social media channels, e.g. Facebook (META), X (formerly Twitter) we will use your name or contact handle in order to communicate with you. Depending on your settings and the relevant policies and terms of service, you might give us permission to access information about you from those accounts or services and that information may be used for broader marketing or other fundraising activities.

#### **o) 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.

#### **p) 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.

#### **q) 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.

## **r) 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.

## **s) 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.

**t) 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.