



## Privacy Policy

The Royal Berks Charity is committed to protecting your privacy.

### Who we are

In this Privacy Policy, **'The Royal Berks Charity', 'rbc', 'we', 'us' or 'our'** means

The Royal Berks Charity (registered charity in England and Wales number 1052720) and the linked Charities which operate within it.

### Our pledge

We are conscious of our responsibilities under the Data Protection Act 2018 and we shall endeavour to ensure that the personal information we obtain will always be held, used and otherwise processed in accordance with that Act and all other applicable data protection laws and regulations.

This statement explains how and why we use your personal information, how we protect your privacy when doing so, and your rights and choices regarding this information.

We are a charity that has relationships with fundraisers, volunteers, supporters and others, so we use personal information on a day-to-day basis in order to operate. Our use of personal information allows us to make better decisions, and fundraise more efficiently and, ultimately, helps us to fulfil our aims.

### What personal information we collect

Personal information is information that can be used to identify you. It can include your name, date of birth, email address, postal address, telephone number, and credit/debit card details.

We collect, store and use the following kinds of personal information:

- your name
- your contact details (including postal address, telephone number, e-mail address and/or social media identity)
- your bank or credit card details where you provide these to make a payment.
- information about your activities on our website or social media platforms when you interact with us, and about the device you use to access these, for instance your IP address and geographical location
- information about events, activities and products which we consider to be of interest to you
- where you have left us a legacy, any information regarding next of kin with which you may have provided us to administer this
- information as to whether you are a taxpayer to enable us to claim Gift Aid
- age, nationality and ethnicity information for monitoring purposes, and

- any other personal information you provide to us
- if you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include things like employment status, previous experience, as well as any unspent criminal convictions or pending court cases you may have) will be managed and stored by the Royal Berkshire NHS Foundation Trust.

## How we collect personal information

### We collect information about you in the following ways:

**When you provide it to us directly:** You may give us your information in order to sign up for one of our events, make a donation, purchase our products, register as a volunteer, or ambassador, or otherwise communicate with us.

When you use our website, we collect your personal information using 'cookies' and other tracking methods.

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to improve the performance of a website, for saving different options and to provide website owners with information on how the site is being used.

We use cookies to enhance the experience of the website, to increase the performance, to identify how the website is being used and where we can make improvements. Some of our cookies are vital for the website to operate effectively and others are optional.

Our website gives the option to opt out of all, except the vital cookies and you can block cookies in your web browser.

Sometimes, when you support us, your information is processed by an organisation working for us (such as a mailing house), but we are responsible for your data at all times. We may also subsequently contact you about supporting our charity or attending one of our events when we have a legitimate reason for doing so, e.g. prior interest in the event or medical area.

**When it is provided to us indirectly:** Sometimes your information may be shared with us by independent event organisations, for example the London Marathon or fundraising sites like JustGiving. These independent third parties will only do so when you have indicated that you wish to support Royal Berks Charity and with your consent. You should check their privacy policies when you provide your information to understand how they will process your data. We may also receive information about you from a friend or family member if they sign you up for one of our events. Or, from subcontractors acting on our behalf who provide us with technical, payment or delivery services, and from business partners, advertising networks and search/analytics providers used on our website.

**When you give permission to other organisations to share it:** Communication, engagement and actions taken through social media platforms that we post on are subject to the terms and conditions, as well as the privacy policies held with each social media platform respectively.

Depending on your setting or privacy policies for social media and messaging apps like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services, for example when you publicly tag us in an event photo.

**Information available publicly:** We supplement information on our supporters 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 fuller understanding of someone's interests and support of **rbc**. For more information, please see our section on "Building profiles of supporters" below.

## How and when will you hear from us

We think it's important to let our supporters know how their money is being spent and to say thank you for their generosity. We send information to individuals who have supported us to say thank you and provide updates on our work.

We may use information we hold about you, for example the record of your previous donations to and/or relationship with us, your location and demographics, as well as the type of activity you have been involved with, to tailor our communications with you about future activities.

If you ask for details of, or register for, a **rbc** event or fundraising activity, we will send you information including, where relevant, ideas for fundraising, key information about the activity and reminders to submit any money raised.

Where you have signed up for an event with a third party (for example the London Marathon) and told the event organiser that you wish to fundraise for us, we may contact you with information and support for your fundraising for that event.

If you take part in a **rbc** or third party event, we may contact you to let you know that the event is happening again and how you can register, unless you have specifically opted out of further marketing.

Being able to contact previous supporters to ask them to consider supporting us again is a very cost effective way of raising funds. Our marketing communications include information about how the charity has supported the Royal Berkshire NHS Foundation Trust, campaigns and requests for donations or other support. Occasionally, we may include information from partner organisations, or organisations who support us in these communications. When you provide your details to us, you will be asked to opt in or opt out of receiving marketing material.

If you decide you would prefer not to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing a donation you have made and any related Gift Aid, thanking you for a donation or participation in an event, or keeping in touch with you about volunteering activities you are doing for us. We promise not to bombard you with communication.

We will never sell or rent your information to third parties for marketing purposes.

## **Managing your contact preferences**

We invite you to tell us how you would like us to communicate, in a way that suits you. If you change your mind and decide you don't want to hear from us any more, that's fine, you can change your preferences at any time. Just let us know on 0118 322 8860 or [charity@royalberkshire.nhs.uk](mailto:charity@royalberkshire.nhs.uk)

## **Legal basis for processing**

Data protection laws mean that each use we make of personal information must have a 'legal basis'. The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

## **Specific consent**

Consent is asking you if we can use your information in a certain way, and you agree to this (for example when we send you marketing material via post, phone, text or e-mail). Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

## **Legal obligation**

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator, Information Commissioner or Gambling Commission, or to use information we collect about you for due diligence or ethical screening purposes.

## **Performance of a contract / take steps at your request to prepare for entry into a contract**

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be if you are buying something from us, for instance some branded merchandise or an event place, applying to work/volunteer with us.

## **Vital interests**

We have a basis to use your personal information where it is necessary for us to protect life or health, for instance if there were to be an emergency impacting individuals at one of our events, or a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

## **Legitimate interests**

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their 'legitimate interests' (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities **rbc** carries out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

- analysis and profiling of our supporters or potential supporters
- updating your address using third party sources if you have moved house (please see the 'Keeping your information up to date' section below for more on this)
- use of personal information when we are monitoring use of our website or apps for technical purposes
- use of personal information to administer, review and keep an internal record of the people we work with, including supporters and volunteers
- sharing of personal information between relevant teams and fundraising partners
- where you have signed up with us on a charity place for a third party event (for example a sponsored run not organised by **rbc**), sharing personal information with the third party event organiser so they can administer the event

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), and how intrusive it is from a privacy perspective, and your rights under data protection laws do not override our (or others') interests in us using your information in this way.

When we use special category personal data (please see the 'What personal information we collect' section), we require an additional legal basis to do so under data protection laws. We will either do so based on your explicit consent, or another route available to us at law for using this type of information. Examples of this are where you have made the information manifestly public, if we need to process it for employment, social security or social protection law purposes or in some cases if it is in the public interest for us to do so.

## **How we keep your information safe**

We ensure that there are appropriate technical and organisational controls in place to protect your personal details, and our network is protected and routinely monitored.

We may need to share your information with our service providers such as external mailing houses that process our appeals. We will always have strict data protection arrangements in place with these fulfilment organisations. Any information we collect is stored and processed in the UK.

## **How long we keep your information for**

We take into account various criteria when determining the appropriate retention period for personal data including:

- the purposes for which we process your personal data and how long we need to keep the data to achieve these purposes
- how long personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements which specify how long certain records must be kept.

## **Sharing your information with other organisations**

### **Joint fundraising**

We may share your information with organisations with whom we undertake joint fundraising campaigns. This may be to ensure that our supporters are not contacted by both organisations, to enable us to assess the success of our activity or to facilitate due diligence where large donations are made to a particular cause.

### **Other sharing**

We may also disclose your information to third parties in connection with the other purposes set out in this policy. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf
- advertisers, social media platforms and advertising networks
- analytics and search engine providers
- IT service providers.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider this necessary, to protect the rights, property or safety of **rbc**, its personnel, visitors, users or others.

We reserve the right to disclose your personal information to third parties:

- if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets.
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### **Keeping your information up to date**

We ask that you please let us know if you move house or change your contact details, so we can keep our records up to date.

While we endeavour to ensure that the information we hold about you is accurate and kept up to date, we shall assume that in the absence of evidence to the contrary, the information you provide us with is accurate. Should you inform us of any

inaccuracies in the information, or which we become aware, they shall be promptly rectified by us.

We may use information from external sources such as the public electoral roll to identify when we think you have changed address so that we can update our records and stay in touch. We only use sources where we are confident that you've been informed of how your information may be shared and used.

We do this so we can continue to contact you where you have chosen to receive marketing messages from us and contact you if we need to make you aware of changes to our terms or assist you with problems with donations.

This activity also prevents us from having duplicate records and out of date preferences, so that we don't contact you when you've asked us not to.

We're committed to putting you in control of your data and you're free to opt out from this activity at any time. To find out more, please contact 0118 322 8860 or [charity@royalberkshire.nhs.uk](mailto:charity@royalberkshire.nhs.uk).

## **Your rights**

Under UK data protection law, you have rights over personal information that we hold about you. We've summarised these below:

### **Right to access your personal information**

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, send a description of the information you want to see by post to The Royal Berks Charity, Royal Berkshire NHS Foundation Trust, London Road, Reading RG1 5AN or by email to [charity@royalberkshire.nhs.uk](mailto:charity@royalberkshire.nhs.uk)

### **Right to have your inaccurate personal information corrected**

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

### **Right to restrict use of your personal information**

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

## **Right to erasure of your personal information**

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done. If we are unable to delete your information, we will explain why this is the case.

## **Right for your personal information to be portable**

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

## **Right to object to the use of your personal information**

If we are processing your personal information based on our legitimate interests, you have a right to object to our use of your information.

If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

If you want to exercise any of the above rights, please contact us on 0118 322 8860 or by email at [charity@royalberkshire.nhs.uk](mailto:charity@royalberkshire.nhs.uk). We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the [Information Commissioners Office](#), the UK data protection regulator.

## **Complaints**

If you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. More details are available in our Complaints Policy on our website.

You also have the right to lodge a complaint about any use of your information with the [Information Commissioners Office](#), the UK data protection regulator.

## **Changes to this Policy**

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on the Royal Berks Charity website or by contacting you directly.

## **Contact us**

If you have any questions, comments or suggestions, please let us know by contacting the Charity Team on 0118 322 8860 or via email at [charity@royalberkshire.nhs.uk](mailto:charity@royalberkshire.nhs.uk)

The Information Governance Team can be contacted at:

The Information Governance Team  
Royal Berkshire Hospital  
Craven Road,  
Reading  
Berkshire  
RG1 5AN

Email: [I.G@royalberkshire.nhs.uk](mailto:I.G@royalberkshire.nhs.uk)

This policy was updated on 22 January 2021

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<sup>i</sup> If you use your credit or debit card to donate to us, buy something or pay for a registration online or over the phone, we will ensure that this is done securely and in accordance with the Payment Card Industry Data Security Standard. More information on PCI DSS is available [here](#). We do not store credit or debit card details, following completion of your transaction. All card details and validation codes are securely destroyed once the payment or donation has been processed. Only staff authorised and trained to process payments will be able to see your card details. If we receive an email containing any credit or debit card details, it will be immediately deleted, no payment will be taken and you will be notified about this.