

# Northern Ireland Hospice

## Privacy Notice (Donors and Supporters)

### Introduction

Northern Ireland Hospice (NIH) is committed to protecting the privacy of everyone who uses our care services (as patients or carers), our employees and volunteers, our education customers, our retail and café customers, our Members and Trustees, our service providers and anyone who supports our work through our fundraising activities. This policy explains what personal data we collect and process, how we collect it, how long we keep it, why we collect and process personal data, whom we share it with, and on what legal basis. It also explains the steps we take to keep data secure and ensures that you remain informed with regard to your rights and in control of your information. We will only use personal data that we collect in line with all applicable laws, including the General Data Protection Regulation (GDPR)

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### 2.0 Donors and Supporters

Northern Ireland Hospice (NIH) has been updating communications preferences with its supporters. This is due to a change to the rules which govern how we can communicate with you and a new regulation on personal data (the General Data Protection Regulation) coming into force in May 2018. Therefore we are introducing new approaches to give you better control of how we contact you. This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (email, phone, SMS or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to change your preferences please contact our Supporter Care Services by e-mailing [supportercare@nihospice.org](mailto:supportercare@nihospice.org),

writing to NIH Supporter Services, 18 O'Neill Road, Newtownabbey, Belfast, BT36 6WB or telephoning 02890 781836 (Lines open 9am - 5pm, Mon - Fri).

Developing a better understanding of our supporters through their personal data allows us to make better decisions, fundraise more efficiently and, ultimately, helps us to reach our mission *to inspire and deliver excellent and compassionate specialist palliative care via effective service models underpinned by exemplary education, innovation and research.*

## 2.1 Where we collect information about you from:

### Directly

You may give us your information in order to sign up to one of our events, tell us your story, make a donation, purchase our products or communicate with us. Sometimes when you support us, your information is collected by an organization working for us (e.g. a payment site for processing a donation) but we are responsible for the data that has been shared with us at all times.

### Indirectly

Your information may be shared with us by independent event organisers or fundraising sites like Just Giving or Virgin Money Giving. These independent third parties will only do so when you have indicated that you wish to support NIH and with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

You may have provided permission for a company or other organisation to share your data with third parties, including charities for example, this could be when you provide details to a Funeral Director for an In Memory Donation.

NIH does not buy data from third party sites.

### Websites or Apps

Like most websites we use "cookies" to help us make our site, and the way you use it, better. Cookies mean that the website will remember you. For further information see our Cookies Statement <https://www.nihospice.org/cookies>

In addition the type of device you are using to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you are using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

### Information that is available publicly

Potential sources include:

- Social Media (depending on your individual privacy settings)
- Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.
- Companies House
- Newspapers
- Public Websites

## 2.2 What personal data we collect and how we use it

The type and quantity of information we collect and how we use it depends on why you are providing it.

### Supporters

If you support us, for example, make a donation, register to fundraise, sign up for an event or buy something from our shop, we will usually collect:

- Your name
- Your contact details including name, address, telephone number, e-mail address
- Your bank or debit/credit card details If you are a UK tax payer, the required details so that we can claim Gift Aid on donations

Where it is appropriate we may also ask for:

- Information relating to your health or dietary requirements (for example if you are taking part in an event)
- Other event based information such as t-shirt size
- Your date of birth
- The fundraising events, volunteering opportunities or activities you are interested in and your personal contact preferences
- Why you have decided to donate to us. We will never make this question mandatory, and only want to know the answer if you are comfortable telling us.

We may use your data to:

- Provide you with the services, products or information you asked for
- Process any payments or donations and administer your donation, including processing gift aid and to acknowledge or support your fundraising
- Keep a record of your relationship with us
- Keep you up to date with our work
- Ensure we know how you wish to be contacted
- Understand how we can improve our services, products or information
- If you enter your details onto one of our online forms, and you don't "send" or "submit" the form, we may contact you to see if we can help with the problems you may be experiencing with the form or our website.
- We may also use your personal information to detect and reduce fraud or risk.

## 2.3 Building profile of supporters and targeting communications

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our supporters. Profiling also allows us to target our resources effectively. We do this because it allows us to understand the background of the people who support us and helps us to make appropriate requests to supporters for example, for certain types of fundraising that may appeal more than others. Importantly, it enables us to raise more funds, sooner, and more cost effectively, than we otherwise would.

When building a profile we may analyse geographic, demographic and other information relating to you in order to better understand your interest and preferences in order to contact you with the most relevant communications. Such information is compiled using publically available data about you, for example, addresses, listed Directorships or typical earnings in a given area.

## Direct Marketing

We may contact you to update you about our work and to ask for donations or other support. We make it easy for you to tell us how you want to communicate, in a way that suits you. Our forms have clear marketing preference questions and we also include information on how to opt out when we contact you in relation to marketing. If you don't want to hear from us, that's fine, just let us know when you provide your data or contact us on 02890 781836 or [supportercare@nihospice.org](mailto:supportercare@nihospice.org)

The legal basis we use for direct marketing campaigns are legitimate interests and/or consent.

Under legitimate interest we may contact you for direct marketing purposes via postal mail if you have supported us in the previous three years, unless you have opted not to receive such communications. We will provide you with any such communications, with details of how you can opt out of receiving them in future.

The legitimate interests of Northern Ireland Hospice are to provide palliative care to patients, and support and information to their carers and families (for example social work, bereavement support, chaplain support) and to manage the effective running of Northern Ireland Hospice.

Under consent we may contact you for direct marketing (fundraising) purposes via electronic communication i.e. text or email provided you have consented. You may withdraw consent to such communications at any time by contacting our Supporter Care Services team (see above).

We do not sell or share personal details to third parties for the purposes of third party marketing. We may use other companies, such as Nueda, to analyse our data for the purpose of fundraising campaigns, however no data will be shared with another company for their use.

## **2.4 Children's data**

Occasionally children attend or participate in our events or fundraise for us. We collect and manage information relevant to these children in a way which is appropriate to the age of the child. Where appropriate we will seek consent from a parent or guardian before collecting information about children. Our events have specific rules about whether children can participate, and we will make sure advertising for these events is age appropriate. In such circumstances we may collect date of birth information. Other than acknowledgements, we do not mail children under the age of 16 for marketing purposes.

## **8.0 General Information**

### **8.1 How do you update your Personal Data?**

We want to make sure that your personal data is accurate and up to date. Please let us know if your details change. We may use publicly available sources to keep your records up to date for example, checking your postcode is correct using the Royal Mail postcode lookup facility.

To let us know of any changes please contact:

Supporter Care Services Team  
Northern Ireland Hospice  
18 O'Neill Road  
Newtownabbey  
BT36 6WB  
Tel: 028 90781 836

### **8.2 What Rights do I have over My Personal Data?**

Under the General Data Protection Regulation, you have the right to:

- be informed – this privacy notice provides the information we are required to provide
- access your personal data
- have your data rectified or erased
- object to or restrict the processing of your data
- withdraw consent if that is the basis of our processing – please contact our Supporter Care Services Team with any request (contact details as above) or our Data Protection Officer with any queries on this issue (contact details below)
- data portability – in limited circumstances you may be entitled to have any personal data we hold and which you provided to us sent electronically to you or direct to another organization at your request
- not to be subjected to automated decision making (including profiling) which produces legal effects or similar significant effects – NI Hospice does not currently do this
- to lodge a complaint with NIH or the overarching regulator, the Information Commissioners Office.

Information Commissioners Office – Northern Ireland  
3<sup>rd</sup> Floor, 14 Cromac Place,  
Belfast,  
BT7 2JB,  
Telephone: 028 90 278 757  
E-mail: [ni@ico.org.uk](mailto:ni@ico.org.uk)

Further information on these rights is available from the Information Commissioners website <https://ico.org.uk/>.

You have a right to receive a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

You have a right to ask us to stop processing or to delete your personal data. Where there is no need to for legal or regulatory requirements to retain the data, we will be able to do this. However, in order to comply with legal requirements such as holding Gift Aid Declarations for HM Revenue & Customs we may need to retain your data.

### **8.3 How we protect and keep your data?**

If you tell us not to contact you we will update our records accordingly.

We have security procedures, rules and technical measures to protect your data. Your data will be kept in a secure environment with access restricted on a need to know basis.

Personal data will not be transferred to any third party in a country or territory outside the European Economic Area unless there is a specific operational reason to do so and in which circumstance we will require the third party to comply with and safeguard the data pursuant to requirements of GDPR. We will only transfer your personal data to a Country or Territory outside the European Economic Area whose data protection laws have been assessed as adequate by the European Commission, or where appropriate safeguards are in place. See Third Party Processing section for further information.

When using websites owned by other organisations to communicate with us, such as Twitter or Facebook, then please consult their privacy policies/notices.

### **8.4 Sharing of your Data by Northern Ireland Hospice**

We will not routinely disclose any information about you without your express permission. However, in addition to some specific reasons for sharing of data outlined within the various sections, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

Any disclosures of personal data are always made on a case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

The additional circumstances when we might have to share your data with other third parties are:

- You ask us to do so;
- If we are under a duty to do so under a legal obligation;
- Our duty to comply with any Court Orders which may be imposed
- To enforce our terms and conditions or other agreements;
- To protect our rights, property, our safety or the safety of our patients, customers or others;
- If the public interest is thought to be of greater importance, for example, if a serious crime has been committed.

We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will only ever share your data in other circumstances if we have your explicit and informed consent. We may use other companies, such as Nueda, to analyse our data to help maintain a list of expressed content.

Rest assured, we never share, sell, swap or rent your data to third parties for marketing purposes. Please also see paragraph 2.3 above.

We may also collect and retain your information if you send feedback about our services or make a complaint.

## 8.5 How we keep data safe and who has access

We ensure that there are appropriate technical controls in place to protect your personal details. For example our online forms are always encrypted and our network is protected with controls regularly monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by properly trained staff, volunteers and contractors. We undertake regular data cleansing to ensure that the data is accurate and consistent with NIH Record Keeping Policy.

## 8.6 Third Party Processing

Sometimes we use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as UK or EU companies, we will take steps to make sure they provide an adequate level of protection in accordance with GDPR. Your personal data will not be transferred to countries outside the EEA unless the country's data protection laws have been assessed as adequate by the EEA or where adequate safeguards as are approved by the EEA and/or ICO are in place. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

## 8.7 Sharing Your Story

You may choose to tell us about your experiences with life threatening, life-limiting illness as a service user, carer, volunteer, staff member, donor or an Ambassador to help further our work. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report.

## 8.8 Retention Period

We do not keep your data for longer than is necessary for the purposes for which it was provided. We will retain information on individuals in compliance with statutory requirements or in line with organisational needs where there are no such statutory requirements. This is in accordance with our Records keeping policy and adheres to the requirements of the GDPR. This policy sets out our retention periods for specific types of personal data and/or the criteria we will use to determine that period.

Current retention timeframes are set out below:

Category	Retention Timeframe
Gift Aid Declarations	6 years
Accounting Records	6 years
Legacies	6 years after final correspondence
Contracts	6 years after completion of contract
Donations paperwork	6 years
Campaigns	6 years
General Correspondence	5 years
Trust Applications	6 years
Complaints	10 years

## 8.9 Changes to this Privacy Notice

We might change this Notice 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 NIH website or by contacting you directly. The date when this privacy notice was last updated will be stated at the end of the Policy

If you have any questions about this privacy notice or about our data processing in general, require more information, or if you want to see what information we hold about you, please contact our Data Protection Officer using the following contact details:

Myles McKeown  
Data Protection Officer  
Northern Ireland Hospice  
18 O'Neill Road  
Newtownabbey  
Co Antrim  
BT36 6WB

Tel: 028 90781 836

Email: [myles.mckeown@nihospice.org](mailto:myles.mckeown@nihospice.org)

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