

# Headway Cambridgeshire

## Privacy Notice for supporters

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## 1. Introduction

At Headway Cambridgeshire we value people above all else, from our clients to our supporters, from our staff to our volunteers. It is only together that we can transform the lives of people with brain injuries and it is, therefore, of vital importance to us that all individuals connected with the charity are treated with consideration, fairness and respect.

We are committed to protecting your personal data and being open and honest about how and why we use it. We strive to comply with the regulatory framework that governs the way we collect and process personal data:

- the Data Protection Act 1998, which will be replaced by the General Data Protection Regulation (EU) 2016/679 from 25 May 2018 ('GDPR')
- the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This Privacy Notice explains how we collect, store and use your data however you interact with us. It also describes our 'legitimate interests' in the data, as defined by GDPR.

Processing of your information is carried out by Headway Cambridgeshire, registered as a charity in England and Wales (1062886) and registered as a company in England (3364699).

If you have any queries at all then please do not hesitate to contact us:

Email: [info@headway-cambs.org.uk](mailto:info@headway-cambs.org.uk)

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

## 2. Individual supporters and donors

We are very grateful for the individual donors who make one-off or regular donations to Headway Cambridgeshire. You provide an important part of our income, allowing us to maintain and improve our services.

As a charity that believes in the importance of personal relationships, it is central to our culture that we say thank you and look after our donors and supporters in the manner you would expect. Collecting and processing personal data is necessary so that we can acknowledge and administer all gifts properly, let you know about the impact of your gift and manage responsibly the way we interact with you regarding future fundraising.

It is also a legal requirement for us to include certain financial data in our statutory accounts which are shared with the HMRC and Charity Commission (who will make the accounts publicly available on their website). In these instances data will be presented in anonymised format.

We, therefore, have a legitimate interest to process data for these purposes.

### **Sensitive data**

We do not request or process any data relating to a child or any data that includes sensitive information such as racial/ethnic group, political opinion, religious or philosophical belief, trade union membership, genetic or biometric data, health information or sexuality.

### **Children**

Where a child, an individual under the age of 16, raises money for Headway Cambridgeshire we will never ask for or record their personal details. If they have done this as an individual we will request the contact details of their parent or guardian. If they have done this as part of a collective, through a social or community group, then we will liaise directly with the responsible adult.

### **Data from third parties**

In most instances we receive personal data directly from you as the donor at the point at which you make a donation. Occasionally this information may come from a third party source (see section 7 below) or from a sponsorship form for example. However, we will only process the data necessary for our administrative purposes.

We will only publish public recognition for a donation if this has been requested or agreed with a donor.

We will not send further marketing communications to you without your express consent, as laid out in section 9 below.

We keep a record of all donations for internal management purposes: for financial reporting, assessment of fundraising performance and so that we have records should a donor give to the charity again or leave a legacy.

### **Major donors**

Like most charities we need to increase the number of major gifts we receive to ensure we are financially sustainable in the future. To look for potential new supporters we research and collect data from our own network of existing donors and contacts, and externally from publicly available sources such as the internet, news media, Companies House, Sunday Times Rich List, LinkedIn profiles, the Charity Commission, corporate websites, etc.

Processing potential and existing donor data includes analysis to identify giving patterns and the capacity to give, in order to identify individuals who may be considered a 'major donor' and to make a judgement about whether it is appropriate to contact them. This kind of processing means that we can target our interactions and communications more effectively, and better address the preferences and personal interests of individual donors, which we hope will lead to a more fulfilling and satisfactory mutual relationship.

We therefore have a legitimate interest to process the major donor data we collate to (a) enable us to secure the long-term financial future of Headway Cambridgeshire and (b) target our fundraising efforts to those potential supporters whose interests most closely align with our mission.

We collect limited, publicly available information in our research and nothing that is sensitive or controversial in any sense. Initially we will only collect basic information, enough to confirm an individual's likely interest in our work and their potential to become a major supporter – for

example their career history/ biography, philanthropic interests and capacity to give, and any existing or previous connection with Headway Cambridgeshire. We use the results of such analysis to decide whether and how to make contact with potential donors.

When making an approach to new supporters, we will make it clear who we are, what we do, why we are contacting you, and how we will use your personal data. You will be directed to this Privacy Notice and given an easy way to opt-out of receiving future communications. We will aim to make this first contact within 30 days of identifying an individual as a potential supporter and should we not receive a response from you we will stop processing your data for this purpose.

We realise that building trust with potential major donors is a long term process and we will not solicit a large gift until it is appropriate to do so. We strive to create the conditions where an individual donor has all the information they need to be able to make a considered and detached judgement before making a gift. We want our relationship with major donors to be mutually rewarding and highly personalised, so the donor's preferences about communications and use of personal data will be paramount.

We will never employ any external organisation to undertake major donor research or wealth screening on our behalf.

By processing data in this way we aim to ensure that we are trustworthy, ethical and respectful in our dealings with our current and future donors.

### **Legacy pledgers and givers**

We are very grateful to donors who wish to leave Headway Cambridgeshire a gift in their Will, often as a result of some personal link to the charity. Legacies are crucial to our long-term financial sustainability.

We realise that such a gift to Headway Cambridgeshire has huge significance for the donor and is part of the legacy that they leave behind. In honouring this important gesture it is important to us to ensure the donor's wishes are respected and the gift administered appropriately.

We therefore have a legitimate interest to process data of this kind so that we can administer the gift, fulfil our financial / reporting obligations and honour the final wishes of the deceased. Executors and / or solicitors will also require us to process this data so that they can fulfil the wishes as laid out in the donor's Will.

If you wish to leave us a legacy, we will record your data either at the point you advise us that you have made a pledge in your Will or when we are notified by your solicitor or executor that we have been named in a Will that has gone to probate.

We keep a record of a donor's donation history for many reasons, including being able to establish a connection with an individual who has left us a gift in their Will. This enables us to be able to thank them and their family appropriately and could provide evidence in the unlikely event of a contested Will.

To make sure a gift in a Will goes to the correct charity it is important that the correct information is included when making your Will. To find out more please visit our website:

[www.headway-cambs.org.uk/how-you-can-help/leave-a-gift-in-your-will](http://www.headway-cambs.org.uk/how-you-can-help/leave-a-gift-in-your-will)

You may wish to make specific requests, for example that the gift is used for a specific project or service. We will always try to fulfil these wishes but it may not always be possible to do so. If you have a special request, please do contact us before you include specific wording in your Will:

Email: [info@headway-cambs.org.uk](mailto:info@headway-cambs.org.uk)

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

*[A gift in a Will to Headway Cambridgeshire can be withdrawn at any time by updating your Will.]*

## **In memory donors**

We are always very grateful when Headway Cambridgeshire is chosen as a beneficiary in remembrance of a loved one. As such, we treat the processing of this data and subsequent communications with sensitivity as we know this can be a difficult time.

We have a legitimate interest to process data of this kind as it is the only way for us to properly acknowledge, receive and record these gifts – and to say thank you to the next of kin.

In most cases information about the donor(s) will come directly from funeral directors and we acknowledge receipt of the donations to them. Sometimes they provide us with details of the next of kin and ask us to also write to them. In some cases the donations come directly from the next of kin or another loved one.

We only process minimal data required to record the gift and provide the required communications, such as an acknowledgement letter and sympathy card.

## **Vulnerable donors**

We will also analyse the data we collect to help us identify any individuals who may be particularly vulnerable or do not have the capacity for major giving. In such cases we will adapt our approach so that we do not cause emotional pressure or distress.

## **3. Community groups**

We are very grateful for the support of community groups who fundraise for Headway Cambridgeshire by holding events or raising money from their members.

Community fundraising generates little personal data – rather we acquire data that is specific to the group, and obtained directly from the group or from a public source such as their own website. Where a member of a community group chooses to give us their own personal contact details we will only process this data to communicate with them strictly in reference to the

community group they represent and only when they have given us the details directly themselves and their consent to use them.

We have a legitimate interest in any personal data arising from community fundraising as we use it to receive and record gifts and to fulfil our financial reporting obligations. We also use it to thank and steward community groups appropriately.

#### **4. Corporate supporters**

Headway Cambridgeshire greatly values its partnerships with corporate organisations who choose to raise funds for us through direct donations, sponsorship, events or 'Charity of the Year' schemes.

Processing data in this respect is necessary to administer the gifts that we receive, steward our existing relationships and develop new relationships so that we can increase our income. We have a legitimate interest to process data in this way.

The data that we use will be specific to the organisation and not contain personal information. This will either be provided directly by the organisation or will be obtained from a publicly available source, such as the organisation's official website.

#### **5. Trust and grant funders**

A large percentage of our income comes from trust and grant funders. We process data in relation to these organisations to enable us to make applications for funding, receive grants and report back to the funder according to their expectations.

We will carry out research from publicly available sources to ensure, as far as possible, we only approach funders whose interests are aligned with ours. A funder will only make an offer of funding if we have met their criteria and they have made a considered decision to support our services.



In all cases we will not be using personal data but only data relating specifically to the funder and obtained from a publicly available source, such as their own website or the Charity Commission.

We have a legitimate interest in processing the data as without doing so we would be unable to apply for funding and, as a consequence, would suffer a loss of income that would put our services at risk.

## **6. Gift Aid**

We will not claim Gift Aid on your behalf unless you have consented for us to do so; i.e. you have completed and returned to us a Gift Aid declaration form. You can download a copy of the Headway Cambridgeshire Gift Aid declaration form here:

[www.headway-cambs.org.uk/assets/files/Gift-Aid-Declaration-April-2016.pdf](http://www.headway-cambs.org.uk/assets/files/Gift-Aid-Declaration-April-2016.pdf)

In order to claim Gift Aid we are required by HMRC to supply them with the data you have provided on the declaration form.

It is important that you only instruct us to claim Gift Aid on your behalf if you are eligible to do so. If you are unsure then please visit the HMRC website:

[www.gov.uk/donating-to-charity/gift-aid](http://www.gov.uk/donating-to-charity/gift-aid)

Where you have asked us to claim Gift Aid on your behalf on all future donations, we will continue to do so unless you request us to stop.

We are required by HMRC to keep Gift Aid declarations on record for six years, or if they are 'enduring' (i.e. covering regular donations) we must keep them permanently, unless the individual stops giving.

## 7. JustGiving and other third party sites

We use some carefully-vetted third party organisations to help us collect donations on behalf of Headway Cambridgeshire. We do this because it is economically efficient to do so and they offer services specifically tailored to our charitable needs.

We use JustGiving so supporters can make donations to and fundraise for Headway Cambridgeshire. When you register as a supporter on JustGiving they will request certain personal data from you. We will have access to this data and will use it in the same way as other data we hold, as laid out in this Privacy Notice. We will use your contact information to administer any donation to Headway Cambridgeshire and to correspond with you regarding this. We will only send you further information, such as marketing communications, if you have specifically requested that we do so. You can read JustGiving's Privacy Policy here:

[www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20](http://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20)

You can also donate to and fundraise for us through BT My Donate. You can read their Privacy Policy here:

[www.btplc.com/mydonate/aboutmydonate/Privacypolicy/index.aspx](http://www.btplc.com/mydonate/aboutmydonate/Privacypolicy/index.aspx)

Individuals can donate their car to us through Charity Car. You can read their Privacy Policy here:

[www.charitycar.co.uk/terms-and-conditions/privacy-policy](http://www.charitycar.co.uk/terms-and-conditions/privacy-policy)

There are also a number of other organisations who may collect data in the process of collecting donations for Headway Cambridgeshire. We handle all of this data in the same way as laid out in this Privacy Notice.

Some organisations such as Amazon and Easy Fundraising will collect funds for us when individuals shop through online retail sites. In these instances we do not receive personal data.

## 8. Social media

We have social media accounts on platforms including Facebook, Twitter, YouTube and Instagram. When you interact with us on these sites you may indirectly provide us with personal data. The data that we receive will depend on your own personal privacy settings and the individual privacy policies of these platforms. If this is something that you are concerned about then we would recommend that you check your privacy settings and the privacy notices on these platforms. Any data that we do receive in this way will be treated with the same respect and ethos as other data laid out in this notice. In the unlikely event that we use this data we will only do so where we have assessed that we have a legal basis to process.

## 9. Marketing communications and your preferences

We feel that it is important to keep you up to date with what we are doing at Headway Cambridgeshire. This helps us to raise awareness about brain injury, share details about our services and raise funds to sustain the charity financially. We, therefore, have a number of marketing communications which we send throughout the year. These include our bi-annual newsletter and yearly round-up. As we rely on donations to maintain and improve our services, some of these communications will include fundraising information and appeals.

We will send you communications relating to our services unless you have asked us not to. For all other communications we will only send these to you if you have consented for us to do so. We will endeavour to send these via your preferred method of contact, post or email. However, please note that our newsletter is now only available digitally, although it can be printed out from its online version.

You can either opt-in or opt-out of Headway Cambridgeshire marketing communications. You can choose your preferred method of contact, post and / or email. You can also choose what types of communications you would like to receive:

- Information about the services we offer for people with a brain injury and their families
- Newsletter (twice a year) - email only
- Events

- Fundraising

Each email you receive from Headway Cambridgeshire will include the option to unsubscribe from our communications or update your preferences. You can also contact us directly to do this should you prefer:

Email: [info@headway-cambs.org.uk](mailto:info@headway-cambs.org.uk)

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

If you are not yet subscribed you can do so using our online sign up form by visiting this URL:

[http://eepurl.com/c\\_hcxT](http://eepurl.com/c_hcxT)

We use the online platform MailChimp to send many of our marketing communications. They have their own Privacy Policy and Terms on their website which we would encourage you to read:

<https://mailchimp.com/legal/>

## **10. Statistical data**

We collect statistical data which helps us to assess our services and evidence the impact of our work. This data is often required by grant funders in our final reporting to them and we also use this data in other ways to publicise our work. This data will only ever be used and presented anonymously; i.e. no personal data will be shared.

## **11. Media**

We create, use and share audio and visual media at Headway Cambridgeshire as it is an important way for us to show who we are, tell our story and explain our services.

Sometimes supporters will appear in our media, such as photographs, videos and audio clips.

Where media is focussed on an individual we will only publish this if we have your consent; i.e. if you have completed and returned to us the appropriate consent form.

On some occasions it may not be possible to obtain consent for every individual. For example, if we are holding a large event and we have a photographer there. On these occasions we will post clear notices advising that the event is being recorded and asking any individuals who are not happy with this to let a member of staff know.

Should you appear in any of our media you can ask us to remove it from the public domain at any time. Should you wish to do so, please contact us, giving your name, relationship with Headway Cambridgeshire and the location of the media. We will then endeavour to remove it and suppress any other instances including your image, voice or other data.

Email: [info@headway-cambs.org.uk](mailto:info@headway-cambs.org.uk)

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

## 12. How we protect your data

Access to your data is limited and it is only used in accordance with this Privacy Notice for the purposes for which the data was obtained.

We store data both physically and digitally and take all reasonable precautions to make sure that the data disclosed to us is kept secure. Our physical files which contain personal data are kept in locked cabinets in a secure building. Our digital files are held on a password protected server which is controlled by a strict password policy. These files are only accessible by trained staff and our data hosting providers, who have been fully vetted and are subject to the requirements laid out in this Privacy Notice. We are protected from hacking on the internet by a Stateful Inspection Firewall which is password protected.

In some instances we may need to share data with a third party, such as with other health professionals when we liaise regarding a specific client or to help us deliver a service or project.

We may be required by law to share your data, such as in cases of criminal or tax investigations.

We may also share your data with the emergency or statutory services if we reasonably assess that there is a serious risk of harm to either you or any another individual.

When we do share data we do all that we can to make sure that it is protected. Digital files will be password protected and only accessible by the parties that require the information.

We will not, under any circumstances, sell or share your data to a third party for their own purposes or for financial gain. You will, therefore, not receive any third party marketing or communications as a result of sharing your data with us. Similarly, we will not purchase data from any third parties for our own use.

All of our staff receive regular data protection training and are committed to the values of the charity, which include upholding the rights of our clients, supporters and volunteers. We remove all data access privileges at the point any member of staff leaves the organisation.

In the unlikely event that a data breach occurs then we will notify any data subjects affected within ten working days and complete a full assessment of the events that led to the breach within 30 working days.

We review our data protection practices regularly to ensure we maintain best practice and keep your data secure.

### **13. How long we hold your data for**

All data we hold in respect of financial transactions, such as client payments or donations, will be held for as long as we are legally required to for tax or accounting purposes. This may be up to six years after a transaction.

For all other data, we will hold this for as long as is necessary for the purpose it was intended and no longer. We will take into account guidance from the Information Commissioner's Office (ICO) in this respect.

Should you request that we no longer process your data for the purposes of direct marketing communications then we may need to add some of your details to a suppression file to make certain that we comply with your request and you receive no further communications.

#### **14. Your rights and how to access your data**

It is always your choice whether or not you give us your data and we want to make sure you have as much control as possible when you do provide us with it.

Under data protection legislation you have a right to see any data that we hold about you. This is called a Subject Access Request (SAR). Should you wish to access the data we hold about you then please contact us in the first instance to discuss the matter:

Email: [info@headway-cambs.org.uk](mailto:info@headway-cambs.org.uk)

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

To process any SAR we will require proof of identity. For anyone acting on behalf of another data subject we will also need you to provide proof that you have legal authority to request the data subject's information.

You also have the right to ask us to rectify or erase your data or restrict its usage. However, in some instances, we may not be able to provide our services or fulfil our legal responsibilities without certain data. This is specifically applicable to clients and their families where we may have a contract in place to provide services. Once again, please contact us should you wish to discuss this.

#### **15. Your responsibility to inform us of changes**

It is important to us that the information we hold about you is accurate and up to date. Please let us know if there are any changes to this information. You can contact us using the details in point 9 above.

## 16. How to make a query or complaint

If you have a query about anything in this Privacy Notice or how we use your data then please contact us:

Email: [info@headway-cambs.org.uk](mailto:info@headway-cambs.org.uk)  
Phone: **01223 576550**  
Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

Should you wish to make a complaint then please send this to us in writing. Your complaint will be passed to our Chief Executive and we will aim to resolve the matter as quickly as possible, usually within ten working days.

If you are unhappy with our response to your complaint then you are able to raise this with the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights.

Website: [www.ico.org.uk](http://www.ico.org.uk)  
Phone: **0303 123 1113**

We are registered with the ICO as a Data Controller. Our registration number is: **Z5992036**

## 17. Changes to our Privacy Notice

We will occasionally need to update our Privacy Notice. We will advise you where possible when we do this but we please ask you to also check it periodically to make sure that you are aware of its contents and are happy with the implications with regards to your data.

You can check the latest version of our Privacy Notice online at:

[www.headway-cambs.org.uk/privacy-notice](http://www.headway-cambs.org.uk/privacy-notice)

(Last updated: 21/05/2018)