

# Data Protection Policy

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Last updated 12.02.18

## BACKGROUND AND RATIONALE

The Children's Hospital Trust, South Africa, (registered with charity number 1121573 in England and Wales) is the UK fundraiser for The Children's Hospital Trust, our sister organisation based in Cape Town, South Africa. Throughout this Policy we refer to ourselves as "CHTSA UK" "we" or "us". An independent UK Charity we operate in direct support of our African partners, working towards our mission of improved access to quality healthcare for Africa's sickest children.

This Privacy Policy applies to the personal information of our existing and prospective donors, fundraisers, supporters and volunteers. It explains why we collect personal information, how we will use it and who we will share it with. For the purposes of data protection law, CHTSA UK is the "data controller" in respect of the personal information covered by this Policy.

CHTSA UK respects your privacy and takes our obligations under data protection law seriously. We hope that this Policy will provide you with the information you require. However, if you have further questions about the way we use your personal information please contact us using the details below:

- By post: **C/O Berry Court Farm, Church Hill, Nether Wallop, Hampshire. SO20 8EY**
- By email: **jen@childrenshospitaltrust.co.uk**

## THE PERSONAL INFORMATION WE COLLECT

When you get in touch with us to fundraise, make a donation, to request information or otherwise support CHTSA UK's work we will collect information about you. The information we collect may include your name, title, email address, home or work address, date of birth, telephone number(s) and job title. In some instances additional information may be required to support your specific fundraising activities, for example [if you have a disability and need assistance to participate in one of our fundraising events.

## WHY WE COLLECT PERSONAL INFORMATION

CHTSA UK collects and processes personal information in order to carry out and support fundraising activities for The Children's Hospital Trust, based in South Africa. This means that we may use the personal information we collect for the following purposes:

- Sending communications about our work, its impact on the children and communities we seek to help and how to support us. For example, we may send you emails about our fundraising activities, how you can get involved or how to donate.
- Maintaining past/current donor lists for historical records, relationship management and to determine who we may ask to support us in the future.
- Maintaining accurate list of individuals that do/do not wish to receive further contact from us .
- Delivering our key community fundraising events currently including the Royal Parks Foundation Half and the Cape Town Cycle Tour.

- The delivery of a positive 'Donor Journey' with activities including 'Thank you' messages, e-news updates, Birthday/Christmas wishes and event invitations.
- To identify potential networks and connections to inform financial 'asks' and develop individual stewardship strategies.
- To create a prospect management list and approach potential new donors.
- To manage our internal administration, including complying with our accounting, legal and regulatory obligations as a charity.
- The maintenance of an accurate donation log to enable the development of annual accounts.
- The maintenance of up-to-date Gift Aid declarations and delivery of ensuing claims.

In order to ensure the information held is up-to-date and accurate, we may use publicly available sources to verify internal records.

## **DATA COLLECTION POINTS**

Personal information may be collected by us in the following ways:

- When you contact us about our fundraising activities and initiatives, whether by email, phone or via social media.
- When you make a donation to us or fundraise on our behalf.
- When you donate or set up a fundraising page on online giving platforms (Just Giving / Virgin Money Giving).
- When you register through the Charity's official website, for example, to receive our newsletters.
- When you take part in one of our fundraising events, such as the Royal Parks Half Marathon.

We do not buy data from external or third party sources. However, we may obtain information about you from other sources. This includes where a business contact, friend or family member contacts us on your behalf because they think you would be interested in supporting our work. We may also collect and combine your information with publicly available information so that we can tailor the communications we send you and to make sure they are relevant to you. We also use this information to ensure we contact people who are more likely to be interested in supporting our fundraising activities and donating to us.

## **LEGAL BASIS**

Data protection law requires us to have a legal basis for using your personal information. The legal basis will, in almost all circumstances, be one of the following:

- You have provided your consent.
- It is necessary to fulfil a contract that we have in place with you.
- It is necessary so that we can comply with a legal or regulatory obligation we are subject to.
- It is in our legitimate interests as the UK fundraising charity for the Children's Hospital Trust, South Africa so that we can pursue and fulfil our charitable aims.

## **PROVIDING CONSENT TO MARKETING**

CHTSA UK will only send you direct marketing communications by email if you have given unambiguous and explicit 'Opt-in' consent for us to do so.

You will be provided with the option to 'unsubscribe' from all our direct marketing materials. You can also withdraw your consent by contacting:

- **Jennifer Parsons [UK Fundraising Manager]**

jen@childrenshospitaltrust.co.uk

## **RETAINING PERSONAL INFORMATION**

We take steps to ensure that your personal information is only retained for only as long as it is necessary for the purpose it was collected. After this period it will be deleted or in some cases anonymised. If we collected the personal information based on your consent and we have no other legal basis to continue using your information, if you subsequently withdraw your consent, then we will delete your personal information.

## **THIRD PARTIES**

The Children's Hospital Trust, South Africa, works with credited third-party suppliers to support with the delivery of key fundraising activities. These include online giving mechanisms such as Just Giving and Virgin Money Giving, together with event coordinating bodies such as those linked with the Royal Parks Foundation Half. We will receive your personal information from these third-parties where you have agreed that the information can be shared with us. In these instances, you are advised to consult other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

In some situations we may need to share your personal information with other third parties. These situations may include:

- If we merge with another charity.
- Where we are under a legal or regulatory obligation to disclose your information. For example, where we have received a valid request from the police or Charities Commission.
- Where you have provided your consent.
- To obtain legal or financial advice from our professional advisors.
- To enforce an agreement we have with you or investigate a suspected breach of that agreement.
- To protect the rights, property or safety of ourselves or others.

## **PARTNERSHIP WORKING**

Given the nature of our organisation the CHTSA UK works in close collaboration with the Children's Hospital Trust South Africa, based in Cape Town. The South African team provide additional resources with regards to marketing communications, strategy development and finance monitoring. For more information, please refer to our [Annual Report](#).

In order to successfully deliver upon our defined charitable activities it is essential that CHTSA UK works in close collaboration with our sister organisation in Cape Town. In-line with our obligations under data protection law all data is stored on a secure database. This database is hosted in South Africa and marked as regional to CHTSA UK and there are access controls in place.

Our partnership with the Children's Hospital Trust, South Africa, means that we may need to provide them with personal information relating to our donors, fundraisers and volunteers. The specific activities delivered by the South African team on our behalf and where we need to share information with them include:

- The storage of personal information on a secure fundraising database.
- The distribution of e-mail direct marketing activities to CHTSA UK mailing lists.
- The delivery of key community fundraising events currently including the Cape Town Cycle Tour.
- The delivery of a positive 'Donor Journey' with activities to include 'Thank you' messages, e-news updates, Birthday/Christmas wishes and event invitations.

- The maintenance of an accurate donation log to ensure the accurate development of annual accounts.
- The public thanking of individual donors within the publication of Annual Review documentation.

The South African team operate within the bounds of South African Protection of Personal Information Act (POPI) and takes precautions to keep the donor information secure as explained in their Privacy Statement, which is available on the organisation's website:

<http://childrenshospitaltrust.org.za/privacy-policy/>

## **TRANSFERS OUTSIDE THE UK AND EU**

In order to work with our sister organisation in South Africa, your personal information will be transferred to and stored in South Africa. We may also transfer your personal information outside the UK and EU when working with our third party suppliers.

This means it may be transferred to countries which do not offer the same level of legal protection as exists in the UK and EU. Whenever we transfer your information outside of the UK and/or EU (including when your information is stored in South Africa), we will take steps to ensure that adequate safeguards are in place to make sure it is treated securely and in accordance with this Policy. You may contact us for a copy of the safeguards which we have put in place.

## **YOUR RIGHTS**

Data protection law gives you certain rights in relation to your personal information. These include: (in certain circumstances) the right to object to and / or withdraw consent to the processing of your personal information, the right to access to your personal information, and the ability to erase, restrict or receive a machine-readable copy of your personal information.

We will handle any request to exercise your rights in accordance with applicable law. This means there may be certain situations in which we are not legally required to comply with your request. If you wish to exercise any of these rights please refer to the "Contact Us" section of this privacy policy.

## **CONTACT US**

Questions and comments regarding this policy should be sent to:

- **Jennifer Parsons [UK Fundraising Manager]**  
jen@childrenshospitaltrust.co.uk

If you have a complaint or concern about how we have handled your personal information please contact us in the first instance. We will work hard to resolve your concerns, however, if you are still not satisfied you can lodge a complaint with the Information Commission's Office (the data protection regulator in the UK).