

Data Protection & Privacy Policy

Caudwell LymeCo Charity

Last updated	02/03/2021
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At Caudwell LymeCo, we are committed to protecting your personal data.

This policy gives you information about what data we might collect, how it's stored and how it might be used. We will also give an overview of the Data Protection principles and how we operate within them.

How we collect your personal information

We may collect and store personal and information when you sign up to our mailing list, make a donation, place a sponsorship donation, engage in fundraising for us, volunteer with us, or email in (or use the Contact Form/Patient Helpdesk form on the website) for information or advice.

We may also collect data when you enter your information as a lead within a Facebook Leads Ad or similar.

We may also receive information on you from third parties, such as donation platforms Virgin Money Giving, MyDonate or CAF, if you have given your consent for your personal information to be shared with us.

What information we hold about you

When you interact with us, we may record details such as:

- Name and address
- Email address
- Telephone Number
- Demographic
- Details on donations made
- Gift aid status
- Medical information about yourself or your family
- Your bank account details (if you have set up a regular monthly donation).

By disclosing these details to us, you consent to us using the information in accordance with how it has been obtained, and how it is set out in this privacy policy.

How we use this information

We may use your information to:

- respond to correspondence you have sent to us
- process a donation
- process a sales request for our branded charity items
- to inform our direct marketing strategies and campaigns
- to ascertain your interest and capabilities in supporting our charity
- provide news about the charity and its work, its fundraising campaigns and any other related points of interest
- contact you about patient surveys and experience

For the latter two items on this list, we will only use this information and contact you where we have obtained the relevant consent, permissions and preferences (email, post, phone etc) from you via an opt-in process. These preferences can be updated at any time either within the relevant link in each email correspondence we send, or by emailing lymecocharity@caudwell.com. You can also call us on 01630 620 523.

There are other lawful reasons that allow us to process your personal information and one of those is known as 'legitimate interest'. Some examples of where we might use legitimate interest to process your data would be when you have been in touch with the charity to request information, or have made a donation without an option to inform us of your contact preferences. This will not contradict any expressed permission that you have already given us.

We will never sell your data, and we do not pass information on to third parties.

How we protect your personal information

We take appropriate measures from a technical and organisational point of view, to ensure that the information disclosed to us electronically or through the post is kept secure, is accurate, and is up to date.

Although we take all steps to ensure security, no internet connection is 100% secure, and we therefore cannot be held responsible for unauthorised and unintended access that is beyond our control. Any information transmitted via our website and to our email addresses is done so at the users' risk.

We will only keep the data for as long as is relevant or required, particularly in order to operate our services or to comply with legal, tax and accounting requirements.

Sensitive information such as medical information will only be collected on a voluntary basis, where a patient enquiry is sent in, usually via email. These emails and any letters received will be kept securely on our server/in our files for 18 months, after which time they will be deleted or destroyed.

How to find out what information we hold about you

To find out what data we hold on you, or change what we currently have on record, please contact us at lymecocharity@caudwell.com, or call us on 01630 620523.

GDPR Regulation Information and further information on our policy

Definitions

Charity	means Caudwell LymeCo Charity, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Rosanna Milsom.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for

archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity is registered with the Information Commissioner’s Office as a level 1 organisation that processes personal data. The registration number is A8411179.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY