

We are Havens Hospices, based in Essex. We provide hospice care for children, young people and adults who have been diagnosed with life-limiting or incurable illness and we offer support to their families. Through our two hospices, Fair Havens, and Little Havens, we are making everyday count for the people we care for. We are a registered charity (no 1022119) and a company limited by guarantee (no 2805007) and our administration office is at in Southend on Sea, Essex.

If you have any questions about our privacy notice, how we use your data, or our approach to data protection in general, you can contact us as follows:

Email: [dataprotection@havenshospices.org.uk](mailto:dataprotection@havenshospices.org.uk)

Post: 226 Priory Crescent, Southend on Sea, Essex, SS2 6PR

Telephone: 01702 220310

Website: [www.havenshospices.org.uk](http://www.havenshospices.org.uk)

### **What is personal data?**

Personal data is information that can be used to help identify an individual, directly or indirectly, such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

### **What information do we collect and why?**

We collect a variety of personal and non-personal information on the occasions that you have contact with us but generally this might include your name, address, telephone number, email address, IP address, qualifications and skills, information regarding what volunteering activity you have shown interest in or the pages you have accessed on our website.

We use Closed Circuit Television (CCTV) in and around our buildings for security purposes, therefore you may appear in still images and video footage. Our CCTV system and its operation adheres to the CCTV Code of Practice.

### **How do we collect personal information from you?**

- Through meeting you face to face, verbally over the telephone or via video conferencing software such as Zoom and Microsoft Teams.
- When you give it to us via a donation, an event registration form, a contact us or general enquiry form on our website or through letters you send us,
- Through application forms, letters or when you enquire about or apply for a role as a volunteer and as part of the recruitment process,
- When you use any of our services,
- When you volunteer at or attend events,
- From information in the public domain e.g. sources like postcode searches, Companies House, or social media sites such as LinkedIn, X (formerly known as Twitter) and Facebook.

## Why do we collect your personal information?

We will use the information you provide to:

- tell you about the difference your gifts make and what it enables us to do,
- send communications you have requested,
- fulfil your requests – such as applications for volunteering, donations, competition entries, participation in campaigns and research, and provision of information,
- verify your identity and check suitability for a volunteering role,
- manage volunteers including training and competencies,
- organise and administer events, training, and plan fundraising activities,
- review services provided and identify any improvements that can be undertaken,
- process sales transactions, donations, or other payments and verify financial transactions,
- comply with charity law and other regulations such as Gift Aid,
- record any contact we have with you,
- prevent or detect fraud or abuses of our website and enable third parties to carry out technical, logistical, or other functions on our behalf,
- communicate with our supporters and volunteers, including marketing, future events, training opportunities and other promotion,
- carry out research and analysis on the demographics, interests, behaviour, responses and feedback of our supporters and volunteers to help us gain a better understanding of them and to enable us to improve our service,
- provide a personalised service to you when you visit our website – this could include customising the content and/or layout of our pages where appropriate,
- maintain a historical record of Havens Hospices activities,
- manage Havens Hospices operations, including sites and facilities.

## Who do we share your personal information with?

Who we may/do share volunteer data with	Why we would share the information
<b>Disclosure and Barring Service</b>	To process a police check application form, for a potential or existing volunteer (individual would be asked to read and sign the DBS privacy policy and give consent).
<b>Local Councils across Essex:</b> <ul style="list-style-type: none"> <li>• <b>Essex County Council</b></li> <li>• <b>Southend Council</b></li> <li>• <b>Thurrock Council</b></li> <li>• <b>Havering Council</b></li> <li>• <b>Dagenham and Redbridge Council</b></li> </ul>	<p>To process a work permit application form for young volunteers aged 13 to 16.</p> <p>This is a council rule to have a work permit (parent/guardian signs the work permit application form).</p>

Who we may/do share volunteer data with	Why we would share the information
<b>Providing a Certificate of Volunteering</b>	Any future employer of yours requests a certificate of volunteering, then we will seek your consent before sharing your personal information.
<b>Police</b>	We will share your information with law enforcement authorities if we are required to release your personal information by law due to a court order or for the detection and prevention of fraud or other crime.
<b>Council Safeguarding Team</b>	If we had safeguarding concern about a volunteer or an allegation of abuse was made against a volunteer, we have a duty to inform the appropriate Safeguarding Team.
<b>Occupational Health Service</b>	To get advice or guidance on a volunteer's fitness to volunteer, or to be given their vaccination as required for their volunteer role
<b>Access Group</b>	Database used by Havens Hospices to store volunteer information.
<b>Raisers Edge – Blackbaud</b>	Database used by Havens Hospices to store volunteer and supporter information.
<b>Gisby Harrison Solicitors</b>	In the event of a complex legal issue to seek legal advice.
<b>Mailing House</b>	To process mailouts to volunteers and supporters
<b>Volunteers Carer / Support Worker / Power of Attorney</b>	If a volunteer gives us specific consent, we will talk to any of these organisations on their behalf.
<b>Care Quality Commission (CQC)</b>	We are regulated by the CQC and may be subject to an inspection where evidence of volunteers or supporters may be required.
<b>Utilize</b>	Our third-party IT providers who may need to fix an IT issue and would therefore indirectly have access to volunteer or supporter records
<b>Vantage Sentinel</b>	Our third-party software provider for completing risk assessments and recording incidents.
<b>Nisyst</b>	If you donate goods to our shops and allow us to benefit from Gift Aid then we will enter your name, address, and postcode on to our electronic cash register system.
<b>Microsoft</b>	Through our use Microsoft 365 services, including Microsoft Teams video conferencing, which is accredited under ISB1596 to store NHS patient data.
<b>Zoom</b>	Software used for video conferencing
<b>PayPal Worldpay</b>	Secure payment providers collect personal financial information if you use credit or debit cards for registering for events or regular gifts via our website. This personal financial information is not shared with us or retained on our database.
<b>Sterling Lotteries Rapidata Services</b>	If you sign up to our Weekly Draw, we use a company called <a href="http://www.sterlinglotteries.co.uk">www.sterlinglotteries.co.uk</a> to collect your personal and financial information. Sterling lotteries pass the financial information to <a href="http://www.rapidataservices.com">www.rapidataservices.com</a> to undertake the transactions.

Who we may/do share volunteer data with	Why we would share the information
<b>Law Enforcement Authorities</b>	We will share your information with law enforcement authorities if we are required to release your personal information by law due to a court order or for the prevention of fraud or other crime
<b>Certificate of Volunteering</b>	If you are a volunteer and any future employer of yours requests a certificate of volunteering, then we will seek your consent before sharing your personal information.

- Third party service providers we use for the purpose of completing a specific task such as sending bulk mailings or making telephone calls. We only share the personal information necessary to deliver the service and we have contracts in place that require third parties to keep your personal information secure and not to use it for any other purpose.
- On occasion, we will use the information you provide us to target our digital and social media advertising effectively. This could include securely providing contact details such as your name and email address to digital advertising networks or social media companies such as Facebook, Google, and X (formerly known as Twitter). For example, we may use your information to enable us to display adverts to you, or to potential supporters who have similar characteristics to you.

Any information we share with social media companies will be shared in an encrypted format and will not be used for the social media companies' own purposes. You can stop your information being used in this way by contacting us.

Where you have asked us not to use your information for targeted digital advertising, you may still see adverts related to us. This is because the social media site or advertising network may select you based on information they hold, such as your age and location, or websites you have visited, without using information that has been provided by us.

You can control the kind of advertising which you see through the relevant social media site:

- Facebook
  - Instagram
  - LinkedIn
  - X
  - TikTok
  - YouTube
- We will tell you how we collected any personal information about you, and you have the right to see what personal information we have and the right to tell us not to keep it. You can do this using the contact details above.

### What about sensitive information?

Data protection law recognises 'sensitive personal data' or 'special categories of data' covering health information, race, and ethnicity, religious or philosophical beliefs and political opinions, among other things.

We do not collect these types of information unless there is a clear reason to do so - for example where we have a duty to carry out appropriate checks for volunteers for safeguarding purposes and to ensure their safety whilst volunteering, or where we collect health information to ensure we can care appropriately for participants in an event or activity (health information will only be held for the duration of the event and destroyed after the event).

If we collect these types of information, we will make it clear to you what our legitimate interest is and any other legal grounds for processing this information.

### What are the legal bases for processing your data?

Under the Data Protection act 2018/General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

We have a **contractual obligation** when processing data relating to any volunteering (via a Volunteer Agreement), subscriptions, purchases and events you have booked and for the selection of winners from our weekly draw. For clarity, Volunteers are not considered to be employees.

If a volunteer opts out of receiving communications from us, we are still required, under our contractual obligation, to be able to make contact about the volunteering activities, i.e. arranging a shift or sending a long service invite.

We have a **legitimate interest** when balancing the interests of Havens Hospices needs to fundraise against your rights and freedoms and considering your reasonable expectations about how your personal information is used including:

- If you have given a gift or taken part in an event, we believe you have the reasonable right to be thanked and updated on how your money was used and the impact that has made.
- If you have not directly told us yourself that you want to receive a communication from Havens Hospices, we will consider carefully whether on balance, we feel it is legitimate to contact you. We use a 'legitimate interest assessment' every time for:
  - Mailing information we think you might be interested in based on your previous engagement with us.
  - Mailing information such as our regular newsletter or impact report.
  - Using profiling activity\* to better tailor any requests we make of you so that they reflect your specific interests and so that any funding requests are at an appropriate financial level.

- Informing you of the fundraising needs of Havens Hospices and asking for your support using the channels you have indicated previously (e.g. post, email, telephone).

We use a **legal obligation** as the basis for processing any legally required activity such as Gift Aid returns to HMRC (HM Revenue & Customs).

However, you are in control of your information and the information we send you and can make changes at any time. So, every time you hear from us, we will give you the chance to change the information you want to receive from us and when – we call this ‘continuous consent.’ If you tell us you do not want to hear from us, then we promise not to contact you. You are in charge!

Your ‘Continuous Consent’ means we know you are happy with the information you receive from Havens Hospices. But if you need to change something or want us to stop, you can do this at any time. You can change your preferences by visiting our website [www.havenshospices.org.uk/update](http://www.havenshospices.org.uk/update), or call us on 01702 220310, or email us on [changeme@havenshospices.org.uk](mailto:changeme@havenshospices.org.uk). For Volunteers call us on 01702 426237 or email us on [volunteering@havenshospices.org.uk](mailto:volunteering@havenshospices.org.uk).

### How is the personal information we collect about you used?

- To tell you about the difference your gifts make and what it enables us to do
- To ask if you will help us again in the future by giving another gift, volunteering, or using our charity shops
- To tell you about our fundraising events or those organised on our behalf, especially those that we think you might have a special interest in
- To invite you to our memorial services to remember loved ones
- To process a donation you have made
- To process orders you have submitted
- To carry out our obligations arising from any contracts entered into by you and us
- To provide appropriate support if you are participating in an event (e.g. contacting your next of kin if we have permission to do so)
- To deal with your entry into a competition or our weekly draw
- To send communications you have requested
- To better tailor any requests we make of you so that they reflect your specific interests and so that any funding requests are at an appropriate financial level

### How do we store your information, and do we keep it forever?

We will retain your personal information on a range of secure databases and continue to supply you with the communications you have requested from us for a period of two years. Wherever possible we will use your consent preferences over our legitimate interest to enable use to lawfully communicate with you.



Remember, you can withdraw your consent and opt-out at any time.

However, if we have not had any response from you within those two years, we will archive your data record and remove all your personal data.

Unfortunately, we will not be able to remove your information from our systems where we are legally required to hold to fulfil our statutory and legal obligations (e.g. regarding HMRC or Gift Aid) but will only retain in line with retention requirements.

For volunteers, as soon as we are advised by their Volunteer Coordinator that they have left, we securely dispose of their recruitment file. They are marked as a Leaver on the database and then their data is kept for 5 years (in case of any issues / certificate of volunteering requests), after that time it is deleted.

### **What are your data protection rights?**

Under UK data protection law, you have certain rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. If you just want to change the personal information you have provided to us at any time then please visit our website [www.havenshospices.org.uk](http://www.havenshospices.org.uk), call us on 01702 220310, or email us on [changeme@havenshospices.org.uk](mailto:changeme@havenshospices.org.uk). For Volunteers call us on 01702 426237 or email us on [volunteering@havenshospices.org.uk](mailto:volunteering@havenshospices.org.uk).

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances unless we are required to retain your information to fulfil our statutory and legal obligations.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances unless we are required to retain your information to fulfil our statutory and legal obligations.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances unless we are required to retain your information to fulfil our statutory and legal obligations.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request (known as a Data Subject Access Request or DSAR), we have one month to respond to you.

Please contact us at [dataprotection@havenshospices.org.uk](mailto:dataprotection@havenshospices.org.uk) if you wish to make a DSAR.

### **What if you are 16 years old or under?**

If you are aged 16 or under and want to take part in an event, volunteer, donate or get involved with us we must seek permission for this from your parent or guardian first before you can give us your personal information. We are also required by law to obtain a work permit if you volunteer with us.

When we collect personal information from anyone aged 16 or under, we will make it clear why we are collecting this personal information, how it will be used, and we will ensure any further communication is age appropriate.

### **\* What is profiling activity?**

Profiling activity means, as we aim to keep our fundraising costs low, we use a tailored and relevant approach. To do this we use personal information you have given us yourself or personal information which we locate in the public domain through desk or online research (including social media, geographic and demographic information, news articles etc) so we can send you communications offering you things we think you may be interested in (e.g. if you took part in a bike ride we might send you information about the next one).

We also use profiling activity for wealth screening to try to make our financial 'asks' at an appropriate level. You opt out of your personal information being used for research and wealth screening at any time, or you can ask for an explanation of what we do using the contact details above.

### **Review of this Privacy Notice**

This privacy notice is regularly reviewed to ensure compliance.