

Privacy Statement

May 2018 (Version 1.0)

Based in Runcorn, Cheshire; Halton Haven Hospice ("the Hospice", "we", "us") provides free, specialist palliative care to patients facing a life-limiting illness; and their families. The Hospice is a registered charity (no.702654) and company limited by guarantee (no.2397402). Our registered contact details are;

Halton Haven Hospice
Barnfield Avenue
Murdishaw
Runcorn
Cheshire
WA7 6EP

01928 712 728

Any questions or concerns in respect to this privacy statement should be addressed to the Hospice's Data Protection Officer at the Hospice address/telephone number above or via email: dpo@haltonhaven.co.uk

Halton Haven Hospice promises to respect and keep safe any personal data you share with us directly or that we obtain indirectly through a third party. We aim to be clear when we collect your data and we will not process it for anything you wouldn't reasonably expect us to do so as a charity.

We are committed to ensuring data is handled correctly and strive to develop a better understanding of the people we interact with through their personal data which allows us make better decisions, provide better services, fundraise more efficiently and, ultimately, helps us to reach our goal and charity mission. We have introduced this privacy notice to help make our data processing more transparent to everyone who interacts with the Hospice.

If you do not agree to the use of your information according to this statement, please let us know. The Hospice will always give you the opportunity to opt-in and/or opt-out of the use of your information. You can opt-out of things you have previously opted-in to by contacting the Data Protection Officer.

This privacy statement is supported by a clinical information booklet, which has been designed specifically for patients, service users and their families. If you, a relative, or friend are cared for or supported by the Hospice, the personal and/or sensitive personal information you provide to us will be used only for the purposes of providing you with clinical services and monitoring the quality of our services. Please see the Hospice document, "Your Clinical Information" for more details about the clinical information we collect; how we store it and what we do with it.

This privacy statement may occasionally be updated so you may wish to check it each time you submit personal information to the Hospice. The privacy statement will always have the date and version number included at the top of the first page. By checking this you will be able to see if it has been updated since the last time you read it.

Where we collect information about you from

We collect information about you when you give it to us directly or when you give it to us indirectly.

By directly we mean when you give your information directly to the Hospice or to a third party working on our behalf (e.g. a lottery collector). In either case the Hospice will always be responsible for your information.

By indirectly we mean through independent third parties sharing your information with us when you have indicated your support for the Hospice to them and they have a legal basis for the sharing. An example of this may be 'Just Giving'. You are advised to check each individual third parties privacy statement when you provide them with your information; this will enable you to fully understand how they will process your data.

We may also gather information about you from publicly available information sources.

What we collect

The type and quantity of data we collect, and how we use it, depends on why you are providing it. We will obtain personal information about you when you enquire about our activities, register with us, make a donation, apply for employment or otherwise interact with us. We may collect the following information which you provide to us, although this list is not exhaustive;

- Name and date of birth
- Contact information including address, telephone number and email address
- Demographic information
- Bank, credit and debit card details for the purposes of processing lottery transactions
- Other information relevant to donations, Gift Aid, surveys, events, job applications

We may also collect "sensitive personal information" from you. This may include information that;

- Reveals racial or ethnic origin
- Reveals political opinions
- Reveals religious or philosophical beliefs
- Reveals Trade Union membership
- Reveals genetic data
- Is biometric data for the purpose of uniquely identifying a natural person
- Reveals health
- Reveals sexual orientation

We do not process "personal information" or "sensitive personal information" about people unless it is necessary to do so, there are appropriate safeguards in place *and* there is a lawful reason for doing so. There are six possible lawful bases for processing to choose from. They are;

- Consent
- Contract
- Legal Obligation
- Vital Interests
- Public Task
- Legitimate Interest

We may add to what we know about you from publicly available information sources and where possible we use those sources to keep your records up to date.

We would really appreciate it if you would let us know if the contact details or other information the Hospice holds about you change. You can do this by contacting the Hospice Data Protection Officer using the contact details given above.

For the purpose of data protection legislation, people under the age of 16 are classed as children. The Hospice will not process information belonging to children without the express consent of the adult who is legally responsible for them.

The exception to this is the Family Support Service. Consent for data processing is not required for children who access, or seek advice from, counselling services.

A copy of the Hospice Privacy Statement that is suitable for children is available.

Photography

We will only use photographs and videos of you in marketing, promotional or other materials where we have gained valid consent to do so.

What we do with your information

We require the information we gather to understand your needs and provide you with a better service. The following are examples, although the list is by no means exhaustive;

- To provide you with services, products or information you have requested
- To carry out our obligations arising from any contracts entered into by you and us
- To provide further information about our work, services, activities or products
- To process donations or payments we have received from you.
- To further our charitable aims, including for fundraising activities
- To invite voluntary participation in research or surveys
- To register and administer your participation in events for which you have registered
- For administration purposes (e.g. contact about an event you have registered for)
- To detect and reduce fraud and/or under age gambling
- To process your application for a job or volunteer role with us
- To seek your views on the services we provide
- To detect and reduce fraud and to reduce the likelihood of underage gambling

Information is accessed and processed only by those members of staff that have a legitimate reason for doing so.

What we will not do with your information

We will not sell or rent your information to a third party or share your information for marketing purposes.

From time to time, we may share your information with selected third parties, including carefully selected overseas organisations, but only if it is necessary to do so, there is a lawful basis for doing so *and* there are appropriate safeguards in place to ensure third parties are compliant with data protection law.

If you have any questions or concerns regarding third parties please contact the Hospice Data Protection Officer using the contact details given above.

How long we keep your information

The Hospice adheres to a robust retention schedule, which clearly sets out how long we are legally required to retain personal information for prior to destruction. We review the retention periods applicable to the information we hold on a regular basis. We will only keep your information for as long as is necessary for the relevant activity or as long as is set out in any contract with you.

If you have any questions about the retention schedule you can contact the Data Protection Officer.

Compliance with the law and best practice

We aim to ensure that how we collect and use your information complies with the Data Protection Act, the General Data Protection Regulations (GDPR) and the Fundraising Preference Service. We take note of guidance provided by the Information Commissioners' Office in the application of the data protection law.

The Hospice aims to comply with the Fundraising Code of Conduct at all times.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we ensure that we have in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

Digital information is encrypted and protected with 128 Bit encryption on SSL. When you use our secure online donation pages, or you make a payment in one of our retail outlets, your payment is processed by a third party payment processor, who has all of the appropriate legal safeguards in place.

If you have any questions about the security of your information, financial or otherwise, you can contact the Data Protection Officer.

Use of cookies on the Hospice website

The Hospice website, like many others, uses “cookies”. Cookies are small pieces of information that get stored on your computer, which allows the website to recognise that you have visited the website previously. A cookie in no way gives us access to your computer and it does not allow us to identify you. We use cookies to help in the improvement of the website, so that we can deliver to you an enhanced user experience and personalised service. It is possible to switch off cookies in the settings of your web browser. However, if you choose to switch off cookies you may find it results in the loss of some functionality when using the Hospice website. A good source of information about cookies is available at www.allaboutcookies.org

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave the Hospice website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Your rights

Within the General Data Protection Regulations (2018) you have the following rights in relation to your personal data;

(a) The right of access – You have the right to request to know what information the Hospice holds about you, why we have it and what we do with it. This is called a Subject Access Request.

(b) The right to be informed – You have the right to know what we collect, why we collect it and what we do with it. This privacy notice has therefore been developed to provide you with this information

(c) The right to rectification – You have the right to request that we correct any incorrect information that we hold about you

(d) The right to erasure – You have the right to request that we erase your information, although there are strict rules guiding whether or not this is possible

(e) The right to restrict processing – You have the right to block or restrict the processing of your information, although there are strict rules guiding whether or not this is possible

(f) The right to data portability – You have the right to ask for a copy of your information, for your own personal use, although there are strict rules about this

(g) The right to object – You have the right to object to us processing your information at all, although there are strict rules about this

For enquiries about any of the above you should contact the Data Protection officer at dpo@haltonhaven.co.uk

Control of your information

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form, either paper or on the Hospice website, look for the opt-in / opt-out boxes that you can tick to indicate whether or not you wish to receive any further information from the Hospice (for example Direct Marketing). The Hospice will respect your decision
- If you have previously agreed to us using your personal information for sending further information, you may change your mind at any time by writing to us at the Hospice Address above, telephoning us on the Hospice phone number above or emailing us at: dpo@haltonhaven.co.uk The Hospice will respect your decision
- If you do not want us to use external data sources to improve the quality of our relationship with you and to stay in touch with you, you may also request the restriction of this at any time by contacting the Hospice Data Protection Officer using the contact details given above. The Hospice will respect your decision
- You may request details of personal information we hold about you under the Data Protection Act. If you would like a copy of the information we hold please contact the Hospice Data Protection Officer using the contact details given above
- If you believe that any information we are holding is incorrect or incomplete, please contact the Hospice Data Protection Officer using the contact details given above and we will promptly correct any inaccuracies

You also have the "right to be forgotten". This right is to enable you, in certain circumstances, to request the Hospice to delete or remove your personal information, so that it is no longer stored or used. This right applies:

- Where the personal information is no longer necessary in relation to the purpose for which it was originally collected
- When you withdraw consent
- When you object to the storage and use of the information and there is no overriding legitimate interest for continuing to store and use it
- Where the personal information was unlawfully collected and/or used (i.e. otherwise in breach of the GDPR)
- Where the personal information has to be erased in order to comply with a legal obligation

It should be noted that there are circumstances where the Hospice can decline a request to be forgotten. If this should occur the reason will be explained to you. Please contact the Hospice Data Protection Officer using the contact details given above should you wish to exercise your "right to be forgotten".

Concerns

As previously stated any questions or concerns in respect to this privacy statement or your information should be addressed to the Hospice's Data Protection Officer at the Hospice address or telephone number above or via email: dpo@haltonhaven.co.uk. Should you feel that your concerns are not adequately dealt with by the Hospice you can contact the Information Commissioners Office (ICO):

- ICO Helpline: Tel - 0303 123 1113