

7.0 Privacy Notice and Privacy Policy

7.1 Privacy Policy

The charity's privacy policy is the right for an individual to be informed and the charity to be transparent with how it will hold the data and how this will be used.

When an initial enquiry is received from a health care professional, this forms the commencement of the legitimate interest basis, the charity will hold the personal data in line with our Data Retention policy.

When an enquiry is initially received, the charity will send a further form to the health care professional to request further information, including sensitive data, to verify if the person is eligible for a memory day. Once verified the person is eligible, a number of forms are sent to the individual to complete and this will include a Privacy Notice, explaining how their data is held and used.

7.2 Privacy Notice

This statement sets out our policy on the privacy of the individual. We take your privacy seriously and at Steph's Wishes we know you care about your personal privacy. Because we care, we have adopted the practices described in this Privacy Policy in relation to information that we collect through websites operated by us, as well as offline. Steph's Wishes, its employees and trustees may share this personal information with each other and use it consistent with this Privacy Policy. You should not access the "Sites" or use our services until you have carefully read, and agree to, the clauses described in this Privacy Policy.

1.0 - Your consent

Your use of the website signifies your consent to us collecting and using personal data about you as specified below in accordance with this policy statement. Should we choose to change these terms for any reason, the changes will be posted here so that you are always kept informed about the collection and use of your personal information, and when we disclose it.

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number (if you are making donation), as well as information you provide in any communications between us. You will have given us this information whilst making a donation, registering with our charity or any of the other ways to interact with us.

We will mainly use this information:

To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.

To update you with important administrative messages about your donation, an event or services or goods you have requested.

To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to

identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.

To keep a record of your relationship with us.

2.0 - How do we collect personal information about you and how is it used?

2.1 You may provide personal information when communicating with us.

2.2 You may use our services and give your name and e-mail address to make a comment about our services or Web site.

2.3 We will collect information about your tastes and preferences, both when you tell us and by analysis of client traffic, including using "cookies".

2.4 It may be that some of the personal information you give us (for example, about your health and age) is sensitive personal data within the meaning of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). Such information ("sensitive information") will only be disclosed with your express consent and will be treated with extra care and confidentiality and always in accordance with this Privacy Policy.

2.5 It may be that you provide us details of credit or debit cards or bank accounts in making payment to us. Any such information (confidential financial information) will not be disclosed.

2.6 We may use personal information collected about you to help us develop the layout of our website to ensure that our site is as useful and enjoyable as possible.

2.7 We may use personal information collected about you to let you know about functions on our Web site or changes to our terms and conditions of use.

2.8 We do not knowingly solicit or receive information from children under the age of 18.

2.9 The charity seek to handle your data respectfully, however, if you are unhappy with how the charity have handled your data, please contact us using the Contact form or on the email info@stephswishes.org.uk.

3.0 The legal basis for processing the data

When a nomination is initially received relating to the memory days, we will hold the personal information collected on the basis of legitimate interests. This means that the reason that we are processing information is because there is a legitimate interest for Steph's Wishes to process your information to help us to help the nominee with their wish.

Whenever we process your Personal Information under the 'legitimate interests' lawful basis we make sure that we take into account your rights and interests .

When an enquiry is received from a person or business wishing to make a donation, this will be held under a contract basis.

4.0 - Disclosure policy

Any personal information you provide to us including and similar to your name, address, telephone number and e-mail address will not be released, sold, or rented to any entities or individuals outside

of Steph's Wishes , unless: (1) you request or authorise it; (2) the information is provided to help complete a transaction for you; (3) the information is provided to comply with the law, applicable regulations, court orders or summons, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.); (4) the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, client information may be one of the transferred assets);

5.0 How long we keep your information?

We have data retention policies and procedures designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of your personal information. Personal information that we process for any purpose or purposes will not be kept for longer than is necessary.

We may, however, retain personal information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

For a copy of our data retention schedule email info@stephswishes.org.uk.

6.0 – Where we store your information?

We store your information in digital format on secure cloud servers and systems hosted both inside and outside the European Union (EU). Where your data is being transferred outside the EU, we are using adequate safeguards by using EU model clauses other technical and organisational controls with our service providers.

Any personal data collected in paper form (e.g. Documentation Linked to the Memory Day Request) are securely filed at our office location in the United Kingdom (UK).

7.0 - How do we protect your information?

We have strict security procedures covering the storage of your information in order to prevent unauthorised access and to comply with the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This means that sometimes we may ask you for proof of identity or for other personal information before we can process your call or enquiry further.

8.0 – How you can get access to your information and your rights?

You have the right at any time to:

- Ask for a copy of the information about you held by us in our records
- Ask us to correct any inaccuracies in your information
- Make a request to us to delete what personal information of yours we hold
- Object to receiving any marketing communications from us

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email info@stephswishes.org.uk.

If you still feel that your personal information has not been handled appropriately according to the law, you can contact the Information Commissioner's Office here: <https://ico.org.uk/concerns/> and file a complaint with them.

9.0 - What are cookies and how do we deal with them?

A cookie is a piece of information that is stored on your computer's hard drive. It is normally sent by a web server to you and enables the server to collect information back from your site visit. Although this data is initially collected, this is not used and is deleted from our servers on a regular basis.

10.0 External Sites.

Steph's Wishes is not responsible for the content of external internet sites. You are advised to read the privacy policy of external sites before disclosing any personal information.

11.0 – Changes to this privacy notice

We keep our privacy notice under regular review and will place any updates on this web page. This privacy notice was last updated on 22nd January 2019.

12.0 - How to contact us

If you have any questions or concerns about this policy, please call us on +44 (07855) 722525 or email via our contact section.