



Introduction

This Privacy Policy explains how personal data is collected and used by The Charley Paige Trust (referred to as “**we**”, “**us**”, “**our**” throughout this Privacy Policy).

We respect your privacy and are committed to protecting your personal data. We recognise that, as a charitable organisation, and in light of the wide-ranging work that we carry out in the community, we will collect and use personal data about various categories of individuals. We take data protection very seriously and will ensure that we uphold the trust that our service users, applicants, supporters, fundraisers and donors place in us when they provide us with their personal information.

This Privacy Policy will inform you as to how we collect, use, handle and disclose your personal data, as well as telling you about your privacy rights and how the law protects you. If you need any more information about our data protection practices, please contact us using the details below.

The following key terms are used in this Privacy Policy:

- “**personal data**” means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data);
- “**sensitive personal data**” means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal data relating to criminal offences and convictions; and
- “**legitimate interest**” means the interest of our charity in conducting and managing our charity to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the privacy impact on you (unless we have your consent or are otherwise required or permitted to by law).

1. Important information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your personal data, including any data you may provide when you contact us by telephone, email, post, social media or via our website, when you talk to us face to face, when you complete an enquiry form on our website, when you access our website, purchase anything on our website, when you sign up to our newsletter, when you make a donation, and when you complete our application form.

Please read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Controller

We are the “controller” for the purposes of data protection legislation, and we are therefore responsible for your personal data.

We have appointed a data compliance manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights (see section 9 below), please contact the data compliance manager by sending an e-mail to: info@charleypaigetrust.org.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (“ICO”), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

This version was last updated on 7 February 2020.

We keep this Privacy Policy under regular review and may amend it from time to time. Please check back regularly to view the latest version.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications including, but not limited to, YouTube, Just Giving and Facebook. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. Data protection principles

We adhere to the principles set out in data protection legislation when handling personal data. These principles require personal data to be:

- (a) Processed lawfully, fairly and in a transparent manner.
- (b) Collected only for specified, explicit and legitimate purposes.
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- (d) Accurate and where necessary kept up to date.
- (e) Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed.
- (f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- (g) Not transferred to another country without appropriate safeguards being in place.
- (h) Made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.

We are also responsible and accountable for ensuring that we can demonstrate compliance with the data protection principles listed above.

3. How we collect information about you

We may collect, use, store and transfer different kinds of personal data about you. We collect and process personal data about you when you:

- complete our application form;
- participate in our support programmes;
- make a donation (unless made anonymously) or set up a standing order for donations;
- purchase any products from us;
- fundraise for us or support us otherwise;
- provide supporting medical documents or information on an application form in a professional capacity;
- participate in a tombola, lucky dip, raffle or other competitions ran by us from time to time;
- participate in our art exhibitions;
- follow us, comment on our posts or interact with us in any way using social media;
- contact us with an enquiry or otherwise by e-mail, telephone, post, or through the website; or
- sign-up for our newsletter or other promotional material.

Personal data is usually collected from you through direct interaction with us (either in person, by phone, by e-mail, by post or through this website). We may on occasion collect personal data from our partners or third parties, such as social workers or medical professionals or other third parties that we work with and who have provided your personal information to us, either with your consent or on some other lawful basis.

We may also collect personal data when you use this website, through automated technologies, analytics providers (such as Google Analytics) or search engine providers. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website. We use cookies to assist the site running as effectively as possible. For further details, please see how cookie policy here: <http://charleypaigetrust.org.uk/cookie-policy/>

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

If you fail to provide personal data

Where we need to collect personal data by law, or we need to collect personal data in order to process your application or receive your donation, and you fail to provide that data when requested, we may not be able to process your application or donation, or perform any other services requested by you. If this is the case, we will notify you at the time.

4. What information we collect and how we use it

The personal data that we collect will include:

- Contact details including your name, address, telephone number, e-mail address and social media details;
- Information about your identity such as your date of birth and your gender;
- Any information provided on an application form submitted to us including:
 - The name of your child should you provide it to us through the application form, or other enquiries, requests for support or similar;
 - The letter you provide to us from a doctor outlining your child's medical condition;
 - The category of your request (for example, travel expenses, subsistence, equipment, etc);
 - The amount of money requested and the amount of money granted; or
 - Details of other grants or financial assistance previously received for the benefit of your child;
- Payment information, including credit/debit card details and bank account details (for example, if you donate through us or purchase an item from our website);
- Contact history, such as any communications with us by telephone, e-mail, post, through our website or via social media;
- Transaction history, including information about the services that you have purchased;
- Your responses to competitions, promotions and any surveys that we may undertake from time to time;
- Your marketing preferences;
- Technical data such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, session replay data and other technology on the devices you use to access the website; and
- Information about our visit, including products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data under data protection law, as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate data about your use of the website to calculate the percentage of users accessing a specific feature. Likewise, we may aggregate data that we collect through providing our services in order to produce funding reports or applications. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Given the nature of our organisation, we may collect and process **sensitive personal data** (as defined in the Glossary) about you from time to time. For example, if you complete an application form for our support, we will collect medical information from you through the doctor's letter regarding your child's medical condition. If we collect sensitive personal data from you, we will use it as permitted under data protection legislation and will treat that information with extra care and confidentiality.

We will generally use your personal data to:

- Help us to identify you when you contact us;

- Contact you by post, e-mail, via social media, face to face or by telephone regarding your application or your enquiry;
- Provide our support work and financial support (if applicable);
- Provide the services or goods that you have purchased from us;
- Process financial transactions (including collection of payments, management of any additional charges and fees and administration of any refunds);
- Generally administer our relationship with you;
- Send you information by e-mail, post or text message about news, updates, events, offers, and competitions (see the “Marketing” section below for further details);
- Enter you into a competition (including where we have been provided your details by a third party who has nominated you for an award);
- Process your donation or claim Gift Aid on your donations and verify any financial transactions;
- Comply with our legal and regulatory obligations, including the recommendations of the Charity Commission;
- Keep a record of your relationship with us;
- Prevent and detect fraud;
- Provide service and support (including investigating complaints);
- Train our staff and carry out quality control;
- Use data analytics to improve this website, marketing, donor relationships, user experience and our charity in general;
- Administer and protect the website and our charity (including troubleshooting, data analysis, testing and system maintenance and network security); and
- Allow you to participate in any interactive features on the website.

Lawful basis for using your information

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (for example, because you have purchased an item from our website).

However, there are other lawful reasons that allow us to process your personal information and one of those is called “legitimate interests”. This means that the reason that we are processing information is because there is a legitimate interest for us to process your information to help us to achieve our charitable objectives in providing support to sick children and their parents.

Whenever we process your personal data on the basis of a “legitimate interest”, we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is a disproportionate privacy impact on you.

Marketing

If you are a consumer, we will only contact you by e-mail for marketing purposes if you have given us your opt-in consent to do so. This may include information about products and services offered by us that are similar to those that we have already provided to you or that you have requested us

to provide to you, to notify you about changes to our service, or any other information which we have a legitimate interest to contact you about, unless you have asked us not to do so. You can manage your preferences at any time by contacting us using the details set out below.

Please note that we will continue contacting you about information that is connected to the contract that you have with us, including delivery of a product that you may have purchased from us or our other services you may have requested from us. We will also continue to contact you to provide you with our newsletter if you have previously signed up to receive it.

We will not share your information for marketing purposes with any company or other entity outside of our charity, unless we have your opt-in consent to do so.

You can ask us or third parties to stop sending you marketing messages by [contacting us](#) at any time or by clicking the “unsubscribe” button in the relevant e-mail.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

- Donation agents such as JustGiving Foundation and Gift Aid, for the purposes of administering your donation.
- Third party agencies such as credit reference agencies for identification verification purposes, contracted courier and delivery companies or secure online payment platforms.
- Third parties who may help us with the provision of equipment, subsistence, activity or travel, for the purposes of providing you with the support that you have requested from us.
- Local authorities, the police and other social care organisations for safeguarding purposes (for example, where required by law).
- Service providers who provide IT, security, software and system administration services.
- Medical professionals, for the purposes of verifying your application.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, experts, accountants, insurers and other third parties based who provide legal, banking, consultancy, accounting, insurance and other related services.
- HM Revenue & Customs, regulators and other authorities (including the Charities Commission) acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their

own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not and will not sell your personal data to any third party.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Our website is managed by [SpiralNet Design](#) who help to maintain the security and the performance of our website.

The Website may include third-party advertising and links to other websites. We do not provide any Personal Data to these advertisers or third-party websites.

We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our reasonable control and we exclude all liability for loss that you may incur when using third party websites.

8. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available on request by [contacting us](#) using the details above.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, as follows:

- **Request access to your personal data.** This is commonly known as a “data subject access request” and enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information

unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data.** Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent.** Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#). You can find out more about these rights by viewing the ICO's guidance here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

10. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

11. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

12. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.