

# **BOSP**

## **Privacy Notice for Supporters and Potential Supporters**



BOSP is committed to respecting your privacy. This notice is to explain how we may use personal data we collect before, during and after your relationship with us as a supporter. This notice applies to current, former and potential supporters. This notice explains how we comply with the law on data protection, what your rights are for the purposes of data protection.

BOSP has not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Lead has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

### **1. PERSONAL DATA**

When you support us by making a donation, attending an event or fundraising for us, you may provide us with or we may obtain personal data about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- date of birth;
- records of your interactions with us such as telephone conversations, emails and other;
- donation and gift aid details;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you;
- employers name;
- charities you have supported in the past;
- your affinity to other clubs/associations.

### **2. WHERE WE COLLECT YOUR DATA**

We typically collect personal data about our supporters when provided by you. We will also collect additional personal data throughout the period of you supporting us and when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

Personal data, such as your name, company, position held, contact details, past donations, whether you have an affinity to BOSP's cause, and other charities you have given to in the past, may be obtained from the public domain or a publicly accessible source.

### **3. USES MADE OF YOUR PERSONAL DATA**

The table below describes the main purposes for which we process your personal data, the categories of your data involved and our lawful basis for being able to do this.

By law, we are allowed to process your data for one or more of these reasons:

- You have given us your consent;
- It is necessary for us to be legally compliant;



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- There is a legitimate interest to do so i.e. research to assess a potential propensity for giving, provided you haven't requested that we do not contact you.

| <b>Purpose</b>  | <b>Personal Data used</b>                                    | <b>Lawful basis</b>                                   |
|---|--|---|
| <b>Non- 'special categories' of Personal Data</b>   |  |   |
| <b>To process and acknowledge your donation, sponsorship or gift aid</b>  | All the personal data you have provided when you support us  | Consent   |
| <b>To deliver services, literature and/or other material and information you have requested</b>   | All the personal data you have provided when you support us  | Consent   |
| <b>Unless you tell us otherwise, we may send you information we think may be of interest, such as updates on our work, news, fundraising appeals, volunteering opportunities and events. We may send this via email if you have given us your consent</b> | All the personal data you have provided when you support us  | Legitimate interest;<br>Consent                       |
| <b>To contact you about making a celebratory gift, leaving a gift in your Will, or to give details of other ways to support or fundraise for BOSP that you have expressed interest in</b>   | All the personal data you have provided when you support us  | Consent   |
| <b>To run our internal administration and keep a record of your relationship with us</b>  | All the personal data you have provided when you support us  | Consent;<br>Legitimate interest;<br>Legal obligation. |
| <b>To manage your communication preferences</b>   | All the personal data you have provided when you support us. | Consent   |



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|   |  |   |
|---|--|---|
| <b>To carry out research and surveys about our services</b>   | All the personal data you have provided when you support us  | Legitimate interest                       |
| <b>To apply with applicable laws and regulations</b>  | All the personal data you have provided when you support us  | Legal obligation                          |
| <b>To assess willingness and ability to make donations or engage in campaigns</b>   | Possible affinity to BOSP, propensity to give, details of past charitable giving to similar organisations  | Legitimate interest                       |
| <b>To see if your company/employer has a corporate social responsibility policy</b>   | <i>Information about charities supported in the past; type of charitable activities participated in</i>  | Legitimate interest                       |
| <b>To make decisions affecting what service we would offer you or what requests we would make of you are taken using profiling via our CRM (Customer Relationship Marketing system)</b> |  |   |
| <b>'Special categories' of Personal Data and Criminal Records</b>   |  |   |
| <b>To exercise due diligence before engaging in a partnership with an individual or company, to ensure no conflict of interest or potential conflict of interest</b>                    | Unfavourable personal or business interests i.e. we would not pursue a partnership with a company with a history of disability discrimination etc. | Legal obligation;<br>Legitimate interest. |

Where you have given us your consent to use your personal data in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal data to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the data in the first place, for example we may no longer be able to provide certain benefits to you as a supporter.

#### 4. DIRECT MARKETING

We may contact you by email, post or SMS with information about events, products and services we believe you may be interested in. We will only send marketing messages via email and SMS in

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accordance with the marketing preferences you set. We may, however, send you information in the post under the legal basis of legitimate interest. You can let us know at any time that you do not wish to receive marketing by emailing us at [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk).

### 5. DISCLOSURE OF YOUR PERSONAL DATA

Sharing personal data with the following parties:

- **Any party approved by you;**
- **Other service providers:** for example CCTV (if you attend a BOSP event) and IT services (including CRM, website, video- and teleconference services);
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives;
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security

We do not disclose personal data to anyone else except as set out above. We will never share, sell, swap or rent your data to third parties for marketing purposes.

### 6. WHERE WE STORE YOUR PERSONAL DATA

Personal data we collect from you for BOSP fundraising and marketing purposes is kept either in a locked and secure cabinet, drawer or locker, in an electronic format on an encrypted computer or portable device, or transferred and stored securely in the Cloud, outside of the European Economic Area. We have security procedures, rules and technical measures in place to protect your personal data. Your personal data will be kept in a secure environment with access restricted on a need to know basis. We will take all reasonable steps to ensure that your personal data is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. The Cloud based system we use conforms to TRUSTe's privacy certificate programme and has EU-US Privacy Shield Certification, thereby conforming to the GDPR 2018. For further details please contact us by using the details set out in the "**Contacting us**" section below.

### 7. HOW LONG WE KEEP YOUR PERSONAL DATA

The duration for which we retain your personal data will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal data may be retained on a long-term basis: for example, personal data that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years (if you are currently supporting us, this may be for 6 years after you last supported us. Exceptions to this rule are:

- Where the basis for obtaining and processing data is 'legitimate interest', this data will be retained for 10 years.

Where you have given consent for your personal data to be processed by BOSP, we will renew this consent every 5 years.

It is important to ensure that the personal data we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email

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address. To update the personal data we hold about you, you can contact us by using the details set out in the "Contacting us" section below.

### 8. YOUR RIGHTS IN RELATION TO PERSONAL DATA

You have the following rights in relation to your personal data:

- the right to be informed about how your personal data is being used;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the erasure of your personal data in certain limited circumstances;
- the right to restrict processing of your personal data where certain requirements are met;
- the right to object to the processing of your personal data;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal data.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal data recorded and stored by us. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal data, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

If you are unhappy with the way we are using your personal data, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

### 9. SUBJECT ACCESS RIGHTS

You have the right to access the personal data that we hold about you. Should you wish to receive details of what we hold about you, please contact us using the details set out in the "**Contacting us**" section below. We agree to provide this information to you free of charge, within one month. For manifestly unfounded or excessively repetitive requests, BOSP may refuse these additional requests or charge for this service.

### 10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal data.

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### **11. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk) or write to us at The Data Protection Lead, BOSP, 117 High Street, Billericay, Essex, CM12 9AH.