

## **BOSP PRIVACY NOTICE**

### **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 explains how we comply with the law on data protection, and what your rights are for the purposes of data protection. This notice applies to current, former and potential supporters (including individual donors, funders and fundraisers).



We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, instead our Board of trustees and CEO have overall responsibility for data protection compliance within BOSP, supported by our Data Protection Lead. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

### **PERSONAL DATA**

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

- 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

### **WHERE WE COLLECT YOUR DATA**

We typically collect personal data about our supporters when provided directly 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.

We sometimes collect data from other independent organisations or individuals. For example, you may participate in an event such as the London Marathon and nominate us as your chosen charity. The organiser or individual may share your details with us. These organisations or individuals should only share your details with us when you have given them permission to do so. You should check their privacy notice when you provide your information to them, to ensure you fully understand what they will do with your personal data.

We may receive personal information about you from one of the on-line giving platforms, such as Virgin Money or Just Giving.

We sometimes collect data that is publicly available, such as information from public bodies, such as Companies House or from information that has been widely published such as in newspapers or magazines.

## 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;
- 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>
To process and acknowledge your donation, sponsorship or gift aid	All the personal data you have provided when you support us	Consent; Legal obligation; Legitimate interest
To deliver services, literature and/or other material and information you have requested	All the personal data you have provided when you support us	Consent; Legitimate interest
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	All the personal data you have provided when you support us	Consent; Legitimate interest;
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 an interest in	All the personal data you have provided when you support us	Consent; Legitimate interest
To run our internal administration and keep a record of your relationship with us	All the personal data you have provided when you support us	Consent; Legitimate interest; Legal obligation
To manage your communication preferences	All the personal data you have provided when you support us	Consent
To carry out research and surveys about our services	All the personal data you have provided when you support us	Legitimate interest
To apply with applicable laws and regulations	All the personal data you have provided when you support us	Legal obligation
To assess willingness and ability to make donations or engage in campaigns	All the personal data you have provided when you support us  Personal data we have obtained from the public domain	Legitimate interest

To help us plan future fundraising activities	All the personal data you have provided when you support us  Personal data we have obtained from the public domain	Legitimate interest
To see if your company/employer has a corporate social responsibility policy	Possible affinity to BOSP, propensity to give, details of past charitable giving to similar organisations	Legitimate interest
To make decisions about what service we would offer you or what requests we would make of you	Information about charities you have supported in the past and the type of charitable activities you have participated in	Legitimate interest
To make decisions about whether to pursue a relationship with an individual or company	Unfavourable personal or business interests	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.

### **PROFILING AND COMMUNICATION TARGETING**

We may profile data to ensure that the communications we send are relevant and timely and provide the best possible experience for our supporters. Analysing the data you have provided and the history of your relationship with us, allows us to target our resources effectively, which we know is important to our supporters.

### **BUILDING PROFILES OF SUPPORTERS AND POTENTIAL SUPPORTERS**

We may undertake research, profiling and analysis to help inform our decisions as a fundraising charity. This may include analysing our supporter base to identify, communicate and engage with philanthropists and people who might choose to give significant donations. This helps us to understand more about the people we engage with, their connection to us and their interests and to make the information we provide to supporters more relevant.

We may carry out in-house research, or from time to time, engage specialist third party research consultancies, to determine whether an individual could be a major potential supporter and what aspects of our work might be of particular interest to them. This helps us to identify and engage with people who may wish to have a closer and more informed relationship with the charity and make a significant gift. This research may be undertaken for both existing and prospective high value donors, as well as to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We may use publicly available information from third party resources such as Google, Companies House, trade press and published biographies. The type of information we collect can include:

- Career overview
- Gift capacity
- Areas of interest

- History of giving to us and others
- How the individual is connected to us and others
- Public information on philanthropic activities

In order to identify people who might benefit from this more personal approach we may screen our database or use a third-party organisation to do so. We may also use profiling information to produce short biographies of people who are due to meet our leadership or attend on of our events. We may also ask existing supporters, volunteers, staff and trustees whether they would be prepared to facilitate introductions of their own networks.

We rely on legitimate interests to process this data as connecting people to our cause is instrumental in meeting our charitable objectives. We are careful to ensure that the information we process is not excessive or intrusive.

If you prefer that we do not use your information in this way, please let us know by contacting us at [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk)

## **DIRECT MARKETING**

We may contact you by email, phone, 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 accordance with the marketing preferences you set. We may, however, send you information in the post or call you unless you have told us that you would prefer not to hear from us.

You can let us know at any time that you do not wish to receive marketing communications from us by emailing us at [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk). We will retain your details on a suppression list to help ensure that we do not continue to contact you with marketing communications. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

## **DISCLOSURE OF YOUR PERSONAL DATA**

We may share your personal data with the following parties:

- **Any party approved by you;**
- **Other service providers:** for example, secure storage and IT services. All our third-party service providers are required to take appropriate security measures to protect your personal data;
- **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

## **WHERE WE STORE YOUR PERSONAL DATA**

Personal data we collect from you as a supporter 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 on our cloud-based CRM database with restricted access. Our CRM database is hosted outside of the European Economic Area and our CRM provider conforms to the to TRUSTe's privacy certificate programme and has EU-US Privacy Shield Certification. 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.

## **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 2 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 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.

## **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.

## **USE OF COOKIES, SOCIAL MEDIA & OUR WEBSITE**

Cookies are text files which collect log on information and visitor behaviour information. Cookies track visitor use and compile statistical reports on website activity. Such information will not identify you personally, it provides statistical data about our visitors and their use of our website and does not identify any personal details whatsoever. It is used by us to analyse how visitors interact with the website so that we can continue to develop and improve it.

Most websites use cookies, and these are downloaded to your computer automatically, however when you visit BOSP's site for the first time you will have the opportunity to check you understand before you proceed. You can set your browser to accept or decline cookies. Please be aware that a decline preference may mean a loss of function in some of our website features.

You might find links to third party websites or advertisements on our website. These websites should have their own cookies and privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Personal data relating to any transactions entered into via our website will be encrypted to ensure its safety. The transmission of data via the internet is not completely secure and therefore, we cannot guarantee the security of data sent to us electronically and the transmission of such data is entirely at your own risk. Where applicable, we have given you/or where you have chosen a password so that you can access certain areas of our site, you are responsible for keeping this password confidential.

## **TRANSFER OF DATA TO THIRD COUNTRIES**

Some of the information you provide to us may be transferred outside the European Economic Area to countries such as the US. This is a transfer to a "third country". We will endeavour to tell you if your personal data is being held or shared with a third country and we will ensure the appropriate contractual provisions are in place to ensure that there are strict rules regarding both the confidentiality and security of your information.

BOSP may also work with suppliers and partners who make use of cloud and/or hosted technologies. We will endeavour to undertake data security due diligence on our partners and ensure that these partners conform to appropriate accreditations.

## **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.

## **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, or to exercise any of the above rights, please email [privacy@bosp.co.uk](mailto:privacy@bosp.co.uk) or write to us at:

Data Protection Lead  
BOSP  
The BOSP Office  
Wat Tyler Country Park  
Pitsea Hall Lane  
Pitsea  
Basildon  
Essex  
SS16 4UH

**Other associated documents**  
BOSP PRIVACY NOTICE (OVERARCHING)  
BOSP Data Protection Policy