

## **Privacy Notice for Supporters**

#### Introduction

This privacy notice tells you what to expect when we use personal information about you as a supporter of National Star. Being a supporter means you are happy to receive updates on our work which may contain opportunities to make a donation or volunteer; you have made or indicated a willingness to make a charitable donation; you have taken part in fundraising activities for us such as events; you participate in other National Star activities, such as our lottery; use or have previously used services provided by our charity; or you are on occasional volunteer. We rely upon and are extremely grateful for the goodwill and generosity of our supporters' contributions to help fund our work with people with disabilities towards achieving their goals. We want this to be a positive and rewarding experience, part of which is wanting you to be fully informed about how we use your data and your rights. We have used examples throughout, which are not intended to be exhaustive.

For simplicity throughout this notice, 'use' means collecting and processing personal data.

#### Who we are

This privacy notice is for National Star, the working name of the registered charity National Star Foundation, charity number 220239. Our address is Ullenwood Manor, Ullenwood, Cheltenham, Gloucestershire, GL53 9QU.

For simplicity throughout this notice, 'we', 'us' and 'our' means National Star.

### Why we use your personal data

We use personal data to:

- Provide you with the services, products or information you asked for, for example, our newsletter, lottery or raffles, or fundraising materials.
- Administer your donation or support your fundraising, including submitting your details to HMRC to claim Gift Aid if applicable.
- Administer your participation in an event.
- Keep you up-to-date with the impact of your support and to ask for financial and non-financial support.
- Support and further our mission, for example if you have shared your story, we may
  use this in marketing or promotional materials.
- As a registered charity which relies on fundraising support, we undertake in-house research and from time to time engage trusted third party partners to gather information about you from publicly available sources, for example Companies House, Charity Commission, the Electoral Register, company websites, media, social networks such as LinkedIn, political and property registers and news archives. We may undertake wealth screening to aid our research using our trusted third party partners. We do not undertake any automated decision making including profiling.

- We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch.
- This research helps us understand more about you as an individual so we can focus
  conversations we have with you about fundraising and volunteering in the most
  effective way, and ensure that we provide you with an experience as a donor or
  potential donor which is appropriate for you. This approach helps us to raise funds
  sooner and more cost effectively.

If you would prefer us not to use your data in this way, please email us at information@nationalstar.org or call us on 01242 524478.

 We also use publicly available sources to carry out due diligence on donors in line with the charity's Ethical Donations Policy and to meet money laundering regulations.

# Your personal data that we use

We use these categories of personal data:

- Name and contact details. This includes email address to send you information about us where you have given us your consent.
- Other personal details, such as occupation and photographs.
- Medical information where relevant to your participation in an event and where you
  have given us your consent to hold it.
- Donation history.
- Financial and payment information such as direct debits and card payments, including your gift aid status.
- Personal data about individuals who may be interested in supporting our work. This
  is through the research and wealth screening we described earlier in this notice. In
  these circumstances, in addition to information we may collect from you, we may also
  hold information about you, for example your interests, education and network of
  contacts, gathered from publicly available sources.
- Other information you may give to us, such as your reasons for supporting us.
- Correspondence and records of our interactions and engagement with you.

# Our legal basis for using your personal data

The law on data protection sets out a number of bases under which an organisation can use your personal data. The applicable bases are:

- Legitimate interest –we have a legitimate interest in using your personal data. For example, to send you information about us in the post, or to gather information about you from publicly available sources. In these cases, we carefully consider the balance of our interests and your rights and freedoms.
- Legal obligation –it may be necessary for us to use your personal data to comply with our legal obligations. For example, holding and sharing Gift Aid details with Her Majesty's Revenue and Customs.
- Consent in some situations we will use your personal data only with your consent.
   For example, when sending you information about us by email. When we seek your

- consent, we will always do so separately and make it clear to you by providing full details. Where you have given us your consent, you are able to withdraw it at any time.
- Where we process your medical information, which is a special category of personal data, our basis is your explicit consent to use this to administer your safe participation in an event. Where you have given us your consent, you are able to withdraw it at any time.

## Who we share your personal data with

We may share some of your personal data with the following categories of recipients:

- Internally, where necessary and appropriate, for the effective management of your financial donation, relationship and communications with the organisation.
- Third parties that process data on our behalf, such as organisations who we use to send fundraising campaigns and event emails, and our lottery operator.
- Third parties we use for data cleansing, research and wealth screening purposes.
   Data cleansing means detecting and correcting inaccurate data, such as invalid postcodes.
- Third parties who process payments and donations, such as Just Giving.
- Regulatory bodies or legal advisors.
- Her Majesty's Revenue and Customs.
- Our own auditors.

### Where your personal data may be used

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as the USA.

For example, this might be required if a third party IT system we use holds your data overseas. If we do this, we will follow a suitable lawful approach to ensure your data receives the same protection as if it were being processed inside the EEA.

### How long we keep your personal data

Whenever we use your personal data, we'll keep it only for as long as is necessary for the purpose for which it was collected. At the end of that period, your data will be securely deleted, or anonymised so that it no longer identifies you and can be used by us for statistical and planning purposes.

Data necessary to make payments are deleted once the payment has been successfully processed.

### Your rights over our use of your personal data

This is an overview of the rights you have:

 Right of rectification – to require us to change incorrect or incomplete personal data about you.

- Right of erasure to require us to stop processing or delete your personal data which is no longer necessary for the purposes it was collected.
- Right to object where we are relying upon our legitimate interest for processing your personal data. Where we use legitimate interests to send you information about us by post, you can tell us that you no longer wish to receive it and we will stop.
- Right to restrict processing for a period whilst the accuracy of your personal data is contested.
- Right of access to obtain a copy of your personal data on request.

To protect the confidentiality of your information, we will verify your identity before actioning any request you make to exercise your rights.

If we are unable to action your request we will explain to you the reasons for our refusal.

## Contacting us about use of your personal data

We hope this privacy notice has helped explain how we use your personal data and your rights. If you have any questions please contact our Data Protection Officer who will be pleased to help you:

- By email to: <u>dataprotection@nationalstar.org</u>
- Or write to us at Data Protection Officer, National Star, Ullenwood Manor, Ullenwood, Cheltenham, Gloucestershire, GL53 9QU

# Contacting the regulator

If you are unhappy with how your personal data has been used, or you are unhappy with our response to any requests regarding the use of your personal data, you have the right to make a complaint to the Information Commissioner's Office (ICO). The ICO is the UK independent supervisory authority for data privacy.

You can contact the ICO online at https://ico.org.uk/concerns/ or by calling them on 0303 123 1113, or on 029 2067 8400 if you are a Welsh speaker.

### Updates to our privacy notice

Any updates we make to this privacy notice in the future will be published on this page and, where appropriate, we will notify you. This notice was last updated on 09/08/21

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