



## **Privacy Notice**

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## ST. MICHAEL'S HOSPICE (North Hampshire) PRIVACY NOTICE

At St. Michael's Hospice (North Hampshire) we are committed to protecting your privacy and protecting any personal information we obtain about you. Whether you are visiting our website, play the Lottery, are a patient or supporter, or when you interact with us by phone, we sometimes receive personal information about you. This Privacy Notice sets out how we obtain, use and store your personal information.

Please read this notice carefully to understand how we collect, use and store your personal information.

Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the Data Protection Act 2018 well as the General Data Protection Regulation (GDPR).

For the purpose of the Data Protection requirements St. Michael's Hospice (North Hampshire) is a registered Data Controller with the Information Commissioners Office, registration no Z6160161 and any data collected will be used and held in accordance with the requirements of the Data Protection Act 2018. \*

### Who we are

St. Michael's Hospice (North Hampshire) is a registered charity (charity number 1002856). St. Michael's Hospice's (North Hampshire) registered address is St. Michael's Hospice (North Hampshire), Basil De Ferranti House, Aldermaston Road, Basingstoke, RG24 9NB. St. Michael's Hospice (North Hampshire) is a Company Limited by Guarantee and its Company No is 02588395.

If you want to request further information about this privacy notice or exercise any of your rights, you can email us at [info@stmichaelshospice.org.uk](mailto:info@stmichaelshospice.org.uk).

We are committed to protecting and respecting your privacy. To enable us to undertake our charitable objectives we collect and use personal information about individuals. We recognise the trust placed in us by individuals whose information we use. This notice (together with any other documents referred to in it) sets out the basis on how any personal data we collect from you, or that you provide to us, or that we obtain about you, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We are committed to ensuring that we do so in a manner that is both lawful and respects your privacy.

This notice applies to the general public including our supporters, contractors, and other customers. We have separate privacy notices for our patients and families, employees, volunteers and job applicants.

### Your Data Protection rights

You have certain rights in relation to your personal information, although those rights will not apply in all cases or to all the information that we hold about you. For example, we may need to continue to hold and process information to establish, exercise or defend our legal rights.

You have the right to be informed about how we use the data you provide. We will try to be as transparent as possible in our interactions with you. Any time you give us personal information you have a right to be informed about why we need it and how we will use it. You can find most of the information you need in this Privacy Notice.

### You have a right of access

You have a right of access to any of your personal data that we hold about you. You can contact us at any time to gain information about what data we hold about you and why we hold it. Please contact the Data Protection Officer at St. Michael's Hospice (North Hampshire) for further information about how we comply with this right at:

Data Protection Officer  
St. Michael's Hospice (North Hampshire),  
Basil De Ferranti House,  
Aldermaston Road,  
Basingstoke,  
RG24 9NB.

Or email [info@stmichaelshospice.org.uk](mailto:info@stmichaelshospice.org.uk)  
Or call us on 01256 844744

If you make a formal request, we will respond to acknowledge your request and will first require you to prove your identity. We may also ask you for any specific information you are seeking to help us make sure we meet your request fully and speed up the process.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

We will provide you the information that you are entitled to as soon as possible and without unreasonable delay and at the latest within one month of your identity having been verified.

In exceptional cases we may extend the period of compliance by a further two months if the request(s) are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

There is no charge made for this right of access by St. Michael's Hospice (North Hampshire).

To make a request to St. Michael's Hospice (North Hampshire) for any personal information we may hold we would ask that you contact our Data Protection Officer, see contact details above.

#### [You have the right to ask us to correct inaccurate personal information](#)

If you believe information we hold about you to be inaccurate or incomplete, you can ask us to correct it or complete it at any time e.g. the spelling of your name or your contact information.

You also have the right to ask for our processing of your personal data to be restricted. For example, if you are contesting the accuracy of data we are using about you. In such cases, we will restrict our processing while we verify the accuracy of the data that we hold.

#### [You can ask for certain information about you to be deleted](#)

You can also ask for certain information about you to be deleted, for example, if you are moving out of the area. In certain cases, we will be unable to delete all your information if there are statutory grounds that require us to retain it (i.e. HMRC, medical or other legal requirements).

#### [You have the right to data portability](#)

You have the right to data portability where processing is automated, although we don't currently carry out any such processing. If we do in future, you can make a request and this data can be exported from our systems for you.

#### [You have the right to ask us not to process your personal data](#)

It is always your decision as to whether you want to receive information about our valuable work, how we raise funds and the ways you can get involved. If you do not want us to use your personal information in these ways please contact us.

You may opt out of any of our marketing communication at any time by clicking the 'unsubscribe' link at the end of our marketing communications or by calling 01256 844744 or email us at [info@stmichaelshospice.org.uk](mailto:info@stmichaelshospice.org.uk)

## Lawful basis for processing

We must have a lawful basis for processing your information; this will vary on the circumstances of why we process and how we use your information, but typical instances include:

- the activities are within our legitimate interests as a charity that provides hospice care. This includes our legitimate interest to generate support, donations and income by direct marketing which are a routine part of the activities we undertake to fund our purposes as a hospice. 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 will not use your personal data for these activities where our interests are overridden by the impact on you and you have the right to ask us not to process your personal data for marketing purposes,
- the processing is necessary for compliance with a legal obligation to which we are subject e.g. we must provide certain contact information and other details about our services to HMRC and the Charities Commission,
- the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law,
- the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract,
- to protect vital interests e.g. the processing is necessary to protect someone's life,
- you have given consent for us to process the information.

## Special Category Data

If we process any special categories of information i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, processing of genetic or biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sexual orientation, we must have a further lawful basis for the processing.

This may include:

- the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services based on legislation or pursuant to contract with a health professional and subject to the relevant conditions and safeguards
- the processing is necessary to protect your vital interests or someone else's vital interests, e.g. where the data subject is physically or legally incapable of giving consent
- the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- you give us consent to do so.

## How we collect information about you

We may collect information about you whenever you interact with us. For example, if you are a patient, register for one of our events, sign up to our newsletter, donate to us, apply for a job or volunteering opportunity, or otherwise give us any other personal information. We may also collect information about you from other organisations if you have given permission to share or the information is available publicly.

## What information we collect and how we use it

Developing a better understanding of our supporters through their personal data allows us to make better decisions, fundraise more efficiently and, ultimately, helps us to give our patients the best possible quality of life by providing specialist care and support both within our Hospice in Basingstoke and at patients' homes throughout North Hampshire.

When you interact with us, we may collect, names, addresses, email addresses, telephone numbers, IP addresses, bank account details, dates of birth and relevant medical information. Unless you are a patient, we do not usually collect sensitive personal data about you e.g. health information, unless there is a clear reason for doing so such as a fundraising event where we need this information to ensure that we provide appropriate facilities or support to enable you to participate in an event. Clear notices will be provided on registration and application forms for such events, so it is clear what information is needed and why we need it.

St. Michael's Hospice (North Hampshire) will never sell your personal information but will use your personal information for a number of reasons including the following:

- For fundraising and to promote the interests of the charity; the generosity of individuals and organisations is essential to funding the vital work we undertake, and we view you as part of the St. Michael's Hospice (North Hampshire) family,

We conduct a range of fundraising and marketing activities in relation to:

- Our cause, campaigns and projects,
- Events and challenges; we send our customers occasional newsletters, event news and updates by email and by post. At times we may also provide you with personalised updates that we think will be most interesting and relevant to you. You can opt out of receiving these marketing messages at any time.

Retail shops and special offers

- We promote our activities through a range of methods and channels, including online and social media platforms. We use personal information to thank you for supporting us and to provide you with further communications about our activities according to your preferences and interests,
- We also ask if you are able to Gift Aid your donations and we will keep information specifically for this reason, as required by HMRC,
- In relation to any correspondence you have entered into with us whether by letter, email, social media or another means
- Dealing with your enquiries, requests and complaints
- Processing a donation you have made
- For 'service administration purposes', which means St. Michael's Hospice (North Hampshire) may contact you for reasons related to a donation you have made or the activity or online content you have signed up for
- For internal record keeping
- Fundraising
- Complying with our legal obligation policies and procedures
- Processing a job application
- To provide you with any information regarding our events or activities or online content
- Data screening and cleansing

We may collect some or all of the information above when you visit our website, depending on how you use it. We monitor how people use our website so we can improve it. However, you can use our website

anonymously without giving us information and we don't know who you are. If you visit our site anonymously, we may still record information about:

- The areas of the website you visit
- The amount of time you spend on the site
- Whether you are new to the site, or have visited before
- How you came to our site, for example via a search engine or through an email link

## Cookies

Cookies are small text files on your device. They are made by your web browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website's server. They improve your experience of using a website for example, by remembering your preference setting and by measuring your use of a website to ensure that it meets your need. You can find more information about Cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org)

### Disabling Cookies

You can manually delete old cookies and stop cookies from being saved to your hard drive in the future. Find out more on the all about cookies website.

## Job Applicants and current and former St. Michael's Hospice (North Hampshire) employees

If you apply to work at St. Michael's Hospice (North Hampshire) we will only use the information you give us to process your application. If we want to disclose information to someone outside the organisation for example, if we need to obtain a reference or we need to complete a Disclosure to the Disclosure & Barring Service, we required to do so by the law.

If you are unsuccessful in your job application, we will hold your personal information for six months after we have finished recruiting the post you applied for. After this date we will destroy or delete the information. If you begin employment we keep the information in this file secure and will only use it for matters that apply directly to your employment. Once you stop working for us we will keep this file according to our retention guidelines.

## Who we share your information with

We will only share personal information within St. Michael's Hospice (North Hampshire), or between the Hospice and the Friends of St. Michael's Hospice, for the purposes for which it was obtained. We will not sell your information to any other organisation and we will keep your information confidential, except where disclosure is required or permitted by the law (for example to Government agencies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing). We may use an external data agency using approved public data sources to check that the contact details we have are up to date. In exceptional circumstances where we think someone is at serious risk of being harmed. We will do everything we can to ensure they meet our required Privacy Standards. We may also be required by law to share information with the police, local authority safeguarding team or other law investigation agency. You will not be informed if this has happened.

We may need to share your information with other partner organisations who assist us to administer certain services, or example sending our marketing material or administering our lottery. We will also share email addresses with providers of social media and email marketing platforms.

Information about the use of IT systems may be shared with technical suppliers for the purposes of support and system administration.



Your information may be shared with us by independent event organisers, for example the London Marathon, or fundraising sites like Just Giving or Virgin Money Giving. These independent third parties will only do so when you have indicated that you wish to support St. Michael's Hospice (North Hampshire). You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

## How we protect your personal information and who has access

We take appropriate physical, electronic and managerial measures to ensure we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any online transmission is always at some risk.

If you use your credit or debit card to donate to us, buy something or pay for a registration online or over the phone we will ensure this is done securely and in accordance with the Payment Card Industry Security Standards. You can find more information about PCI DSS here

[https://www.pcisecuritystandards.org/pci\\_security/](https://www.pcisecuritystandards.org/pci_security/)

We will not retain any of your credit or debit card details.

Our website is HTTP secure with online forms encrypted. Our network is protected and routinely monitored. All databases are encrypted and password protected.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We may use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

## How long will St. Michael's Hospice (North Hampshire) keep my personal information

We will hold your personal information on our systems for as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the claiming of Gift Aid).

Personal information that we no longer need is securely disposed of or anonymised so you can no longer be identified from it. This information may be retained by us in archives for statistical or historical research purposes although we do this in a manner that complies with applicable data protection law.

We do not store any data on those aged under the age of 16 unless there is expressed permission given from a parent or guardian for a special reason.

## Consent from Parents/Guardians if you're under 16

We are committed to protecting the privacy of young the people that engage with us throughout our website and at fundraising events. Our fundraising events also request specific information about the age of



participants. Anyone under the age of 16 must obtain parental or guardian consent before participating in an event organised by St. Michael's Hospice (North Hampshire).

## Complaints

St. Michael's Hospice (North Hampshire) tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of St. Michael's Hospice's (North Hampshire) collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to [info@stmichaelshospice.org.uk](mailto:info@stmichaelshospice.org.uk)

If you believe that St. Michael's Hospice (North Hampshire) has not complied with your data protection rights, you can complain to the Information Commissioner's Office, their address is Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by calling 0303 123 1113.

## Changes to St. Michael's Hospice's (North Hampshire) Privacy Notice

This Privacy Notice may be updated from time to time so you may wish to check it each time you submit personal information.

\* Data Protection Requirements means the Data Protection Act 2018, the General Data Protection Regulations 2018, the EU Data Protection Directive 95/46/EC, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000 (SI 2000/2699), the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, the General Data Protection Regulation (from 25 May 2018) and all other applicable laws and regulations relating to processing of personal data and privacy in any applicable jurisdiction as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner or such other relevant data protection authority.