

Privacy Notice for Fundraising and Donations

1. What This Privacy Notice Is For

This privacy notice describes how and why Worth Abbey collects personal information about individuals when carrying out our fundraising activities and when you make a donation. In accordance with the General Data Protection Regulations (GDPR).

Worth Abbey is committed to being transparent about how it collects and uses data and to meeting its data protection obligations. This privacy notice outlines how we do this. More detail is contained in the Worth Abbey Data Protection Policy which is available on request.

2. Responsibility for Data Protection

Worth Abbey, Paddockhurst Road, Turners Hill, Crawley, West Sussex, RH10 4SB is registered as the Data Controller with the Information Commissioner Office under registration number Z831059X.

The designated Data Protection Lead is the Abbey Bursar. The Abbey Bursar has overall responsibility for compliance with relevant data protection legislation and will endeavour to ensure that all personal data is processed in compliance with this notice.

All requests and enquiries regarding data protection should be sent to the Data Protection Lead by email to <u>accessdata@worth.org.uk</u>.

3. Why the Abbey Needs to Process Personal Data

The Abbey collects and uses personal data for a range of reasons including:

- To keep you informed about events and activities that you have indicated you are interested in;
- To send out newsletters;
- In connection with providing financial support to the Abbey and Outreach Peru Charities;
- To update you with the progress of projects that you have donated to.

4. Types of Personal Data Processed by the Abbey

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Date of birth;
- Gender;
- Family members;
- Records of donations and Gift Aid status, if applicable;

We may also need to process special category data, such as; race, ethnicity, religion, and criminal records. We do so in accordance with applicable law (including with respect to safeguarding) or by explicit consent.

5. How the Abbey Collects Data

The Abbey receives personal data from the individual directly, simply in the ordinary course of interaction or communication.

Data is saved on a Client Relationship Management (CRM) database called Raiser's Edge and some Microsoft Office applications.

6. PayPal

All PayPal transactions are subject to the PayPal Privacy Policy.

7. Who Has Access to Personal Data and Who the Abbey Shares it With

Personal data collected by Worth Abbey may need to be shared with third parties, including other entities in the Worth Group, which comprises of Worth School, Worth Society, Friends of Worth and Worth Abbey Projects Ltd. Data will only be processed by appropriate individuals in accordance with access protocols, for the purposes that the data was provided.

Worth Group IT systems are managed by Worth School. Some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

8. Lawful Basis for Processing Information

We process information to comply with our legal obligations, for the performance of a contract with you or legitimate interest.

9. How Long We Keep Personal Data

The Abbey will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

Records of potential and actual donors and donations	Until requested to remove
Gift Aid declarations	6 years after last payment
Legacies	6 years after completion of estate administration
Photographs	indefinitely for archiving purposes

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Protection Lead <u>accessdata@worth.org.uk</u>. However, please bear in mind that the Abbey will often have lawful and necessary reasons to hold on to some personal data even following such a request.

10. Keeping in Touch and Supporting the Abbey

We may contact you by email, telephone, post or by text message but we will only do this where we are allowed to do so under data protection law (for example, we will need your consent before sending you an email about a fundraising opportunity).

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and/or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents. This is to comply with our legal obligations in relation to money laundering.

We may use your personal information to tailor our fundraising communications to you. We will use the following information for this purpose: your postal address, history of giving and levels/depth of involvement with the Abbey. We will also obtain information from other sources that are publicly available and will date stamp and notate the source as and when we undertake any such searches.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Protection Lead <u>accessdata@worth.org.uk</u> in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the Abbey is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

11. Your Rights

Individuals have various rights under Data Protection Law to access and understand personal data

about them, these rights are:

- Right to be informed we will be transparent about how we collect and process personal information and the purposes that we intent to use it for.
- Right of access you have a right to access the data we hold on you.
- Right of rectification you can ask us to correct information that you believe is incorrect.
- Right to erasure in certain cases, you can ask to be forgotten.
- Right to restriction of processing in certain cases, you can request that we stop processing your data.
- Right to data portability we will make your information available to export for your personal use.
- Right to object you can object to us using your data in certain circumstances, and an absolute right to stop data being used for direct marketing.
- Rights regarding automated decision making.

12. Subject Access Requests

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Data Protection Lead <u>accessdata@worth.org.uk</u>.

Worth Abbey will respond to any such written requests as soon as is reasonably practicable and in any event within one month.

13. Data Accuracy and Security

Worth Abbey will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

Worth Abbey will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to Abbey systems. All staff and trustees will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

14. This Policy

Worth Abbey will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

15. Queries and Complaints

Any comments or queries on this policy should be directed to the Data Protection Lead, <u>accessdata@worth.org.uk</u>.

If an individual believes that the Abbey has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the Data Protection Lead <u>accessdata@worth.org.uk</u>. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the Abbey before involving the regulator.

March 2019