



## Fair Processing Notice – Donations

When Christadelphian Care Homes processes your personal data we are required to comply with the Data Protection Act 2018 (“DPA”) up to and including 24 May 2018, and from 25 May 2018, the General Data Protection Regulation 2016 (“GDPR”) (the DPA and GDPR are together referred to as the “Data Protection Legislation”).

Your personal data includes all the information we hold that identifies you or is about you. Examples of this are: your name, home address and records of donations you have made to Christadelphian Care Homes.

Everything we do with your personal data counts as processing it – this includes collecting, storing, amending, transferring and deleting it. We are therefore required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.

This fair processing notice provides information about the personal data we process, why we process it and how we process it.

### Our responsibilities

Christadelphian Care Homes is the data controller of the personal data you provide. We have appointed a Privacy Officer who has the day to day responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation.

### Why do we process your personal data?

We process your personal data in order to process your donation. If you have Gift Aided your donation your data will be shared with HMRC to enable the Gift Aid to be processed. We may also process your personal data to respond to any queries or comments you submit to us. The legal grounds we rely on to process your data are GDPR article 6(1)(b) performance of contract and GDPR article 6(1)(f) legitimate interests.

### Who will receive your personal data?

For donations made online through JustGiving, your data will be processed by Giving.com Ltd, a company authorised and regulated by the Financial Conduct Authority (ref no. 793668). JustGiving will process your donation and manage Gift Aid, if applicable. JustGiving’s privacy policy is available [here](#).

### How long will we keep your personal data?

We will retain your personal data for six years from the end of the financial year in which your last donation was made. We have a legal requirement to retain some information to fulfil statutory obligations. Your information will be kept securely at all times. Following the end of the six year period, your files and personal data we hold about you will be permanently deleted or destroyed. If we are required to obtain your consent to process your personal data, any information we use for this purpose will be kept until you withdraw your consent, unless we are entitled to retain the personal data on the basis of other grounds set out in the Data Protection Legislation.

### What are your rights?

You benefit from a number of rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner’s Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>). These rights apply for the period in which we process your data.

#### One: Access to your data

You have the right to ask us to confirm that we process your personal data, as well as having the right to request access to/copies of your personal data.



We will provide the information free of charge unless your request is manifestly unfounded or excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information.

We will provide the information you request as soon as possible and in any event within one month of receiving your request. If we need more information to comply with your request, we will let you know.

### Two: Rectification of your data

If you believe personal data we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it unless we don't feel it is appropriate, in which case we will let you know why. We will also let you know if we need more time to comply with your request.

### Three: Right to be forgotten

In some circumstances, you have the right to ask us to delete personal data we hold about you. This right is available to you:

- Where we no longer need your personal data for the purpose for which we collected it
- Where we have collected your personal data on the grounds of consent and you withdraw that consent
- Where you object to the processing and we don't have any overriding legitimate interests to continue processing the data
- Where we have unlawfully processed your personal data (i.e. we have failed to comply with GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation

There are certain scenarios in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

### Four: Right to restrict processing

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we don't have to delete it. This right is available to you:

- If you believe the personal data we hold isn't accurate – we will cease processing it until we can verify its accuracy
- If you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection
- If the processing is unlawful; or
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim

### Five: Data portability

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller. This right only applies to personal data you provide to us:

- Where processing is based on your consent or for performance of a contract (i.e. the right does not apply if we process your personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means

We will respond to your request as soon as possible and in any event within one month from the date we receive it. If we need more time, we will let you know.

### Six: Right to object

You are entitled to object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority
- For direct marketing purposes (including profiling); and/or



- For the purposes of scientific or historical research and statistics

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

### Automated decision making

Automated decision making means making a decision solely by automated means without any human involvement. We do not carry out any automated decision making using your personal data.

### Your right to complain about our processing

If you think we have processed your personal data unlawfully or that we have not complied with GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website - <https://ico.org.uk/concerns/>.

### Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact Sarah Owen, our Data Privacy Officer at our Support Centre on [sarahowen@cch-uk.com](mailto:sarahowen@cch-uk.com).