

## St Luke's Hospice Plymouth Fundraising Privacy Notice

Our supporters are incredibly important to us. Without them, we simply wouldn't be able to help the people who need us or carry on providing the services that so many depend on. Our supporters help us in all kinds of valuable ways – whether it's giving up their time, donating money, goods or services, campaigning, or spreading the word about what we do. However, if you decide to help, St Luke's Hospice Plymouth will always respect your rights and your choices plus we're committed to respecting and protecting any personal information we obtain about you.

This privacy notice explains how we collect, use, and process personal data you provide to us or that we collect about you. Please read it carefully to understand our approach to handling your personal information and the practices we follow.

#### Who we are

St Luke's Hospice Plymouth is an independent charity, providing specialist care and support to people with progressive life-limiting illnesses in Plymouth, Southwest Devon and East Cornwall. As a hospice charity, we are registered with the Care Quality Commission, as well as The Charity Commission.

St Luke's is a Data Controller for the data we hold about you and are responsible for protecting your personal information by adhering to applicable data protection legislation including Data Protection Act 2018, UK General Data Protection Regulation 2021, Privacy and Electronic Communications Regulations (PECR) 2004 and the Data Use and Access Act (DUAA)2025. Our registered charity number 280681.

If you have any queries about this notice or how we use your personal information, please contact our Supporter Care Data Team on 01752 492626 or email <a href="mailto:funadmin@stlukes-hospice.org.uk">funadmin@stlukes-hospice.org.uk</a>. Alternatively, you can email the Data Protection Officer at <a href="mailto:dpo@stlukes-hospice.org.uk">dpo@stlukes-hospice.org.uk</a> or write to us at St Luke's Hospice Plymouth, Stamford Road, Turnchapel, Plymouth, Devon, PL9 9XA.

## What personal information do we collect about you and why?

We process your information when you make a donation to us, register for an event, join our lottery, offer to volunteer or support us in any other way. We will collect your name and address, so that we can process the interaction with you. We will also ask you how you prefer us to contact you.

We may process your personal information to enable us to run our charity effectively, process and manage your support for us, understand you better and to send you news and information about our work, fundraising activities and events.

On occasion, when it is appropriate, we may ask you for further information, such as:

- Your contact number (landline and/or mobile)
- Your email address
- Your date of birth
- Why you are making a donation to us; in particular, whether you are donating in memory of someone and your relationship with that person
- Your interest and activities

We store some information of our interactions with you, including:

- Records of your communications with us
- Donation and Gift Aid information
- Bank Details, if you set up a Direct Debit
- Information you may provide to us such as date of birth or reason for donating
- Any other information you choose to share with us, such as your relationship to other supporters or patients

## We collect your information in different ways

## You give us your data directly:

When you make a donation, register for an event, join our lottery, sign up to Gift Aid, when you donate goods to one of our shops, volunteer, or share your story with us, we collect details that enable us to process or administer our relationship with you.

If you register for an event, sign up for a newsletter, join our lottery or sign up for Gift Aid via our website, the details you submit are collected on our behalf by our website provider.

## You give us your data indirectly:

When you choose to use online fundraising sites or events sites, such as JustGiving, you may agree to them sending us your details so we can contact you to say thank you or register you for an event. Please be aware that third-party websites will have their own privacy practices that are outside of our control. You should check the privacy practices of any website before disclosing any personal information to them.

You may agree to let a friend or colleague, give us your details when registering for an event.

If you set up a direct debit or standing order, your bank will send us enough details to be able to process or administer your donations.

We collect general information about how people use our website to help us improve it. This information does not identify who you are — it is anonymous and combined with data from other users. We may use or share this combined, non-personal data however we see fit. Cookies do not allow us to access your computer or present any information about you, other than that you choose to share via your search engine browser preferences. For further information, please refer to our St Luke's Cookies Policy at <a href="https://www.stlukes-hospice.org.uk/cookie-policy/">www.stlukes-hospice.org.uk/cookie-policy/</a>

We use social media platforms, such as Facebook, X (Twitter), Instagram and LinkedIn. Companies like these use cookies within their systems which may, depending on your privacy settings, allow us to access some information from your accounts.

We also use publicly available information and data sources relating to businesses, such as the Companies House register, to find potential new supporters and invite them to be involved in supporting our cause through tailored communications which may be of interest to them.

# How do we use and process your information, and what legal basis do we use?

## When you tell us your marketing preferences

We will use your personal information:

- to promote to you the aims of St Luke's Hospice Plymouth
- to provide you with services or information you have requested
- where appropriate, to contact you about our work and campaigns
- for future fundraising and promotional purposes, including research and surveys

If you tell us, you are happy to be contacted by **email**, **text and telephone**:

We collect your name, email address and mobile number to contact you with marketing communications. Your details are kept on our database. We share this information with our email platform, to send you emails and our text platform, to send you text messages. Our lawful basis for processing your information in these instances is **consent**.

If you tell us, you are happy to be contacted by **post**:

We collect your name and postal address to send you marketing communications by post. Your details are kept on our database, and we share this information with external mailing companies. Please note that we may send you marketing materials by post where we have not received your explicit consent to do so, unless you have previously told us not to mail you. However, we will use mailing preference services to check this is appropriate. Our lawful basis for processing this information is **legitimate interests**.

## When you support St Luke's Hospice Plymouth

We will use your personal information for administration purposes, including:

- to create an account for you if you register with us
- to thank you for donations received and ask you about Gift Aid
- to notify you about changes to our services or policies
- as part of our efforts to keep our website safe and secure
- to ensure that content from our site is presented in the most effective manner for you and for your computer
- for segmentation of our database, for example, by analysing information such as postcodes of supporters, frequency of donations or when we last contacted someone. This enables us to tailor our communications.

## Signing up to attend or take part in an event

We collect your name, date of birth (to confirm your age at the time of the event), address, email address, telephone number and mobile number (optional) to confirm your place and send you event stewardship information. Booking information is collected via our website and processed through our database. Payment is processed via a separate payment gateway. Our lawful basis for processing your information is **legitimate interests**, however we are also required by law to collect your date of birth to verify age for safeguarding of under 16s and ensure to ensure under 16s do not receive fundraising messages (lawful basis - **legal obligation**)

## Signing up to Gift Aid

We collect your name and address to claim Gift Aid. We share this data with HMRC and our lawful basis for sharing your information is **legal obligation**.

## • Offline – in shops or via fundraising forms

We collect your name, email address, postal address, telephone number and your instruction to claim Gift Aid (which we share with the HMRC) to process your cash donation and thank you. We also have the forms scanned so that we hold them digitally and the information received is stored in our database. Our lawful basis for processing your information is **consent.** 

## Giving us a donation or becoming a regular giver

If you make a donation online – as a one-off or a regular donation

We collect your name, address, email address and phone number to process your donation and to thank you. At the point of payment, you are directed to our payment gateway where your debit/credit card details are collected (these are encrypted). Our lawful basis for processing your information is **legitimate** interests.

## Supporting one of our campaigns to improve care

We collect your name, email address and mobile number to send you campaign updates, when you provide us with these details for this purpose. We share this information with our email platform; to send you emails and we keep these details on our database. Our lawful basis for processing your information is **consent**.

## If you sign up to our lottery

We collect your name, address, email address and phone number to confirm your subscription. At point of payment, depending on your chosen method of payment, you are directed to the relevant payment gateway (to process your debit/credit card) or direct debit processor (to process your bank details). In addition to collecting the above, we will ask for your date of birth to ensure you are over 18 and therefore eligible to enter the lottery. Our lawful basis for processing your information is **consent** however we also have a **legal obligation** to ensure participants are over 18 to comply with gambling laws.

If you ask us to stop sending marketing information, we will update our records to stop these types of communications as quickly as we can, but you may still receive further marketing information for up to 30 days, which were already in progress prior to your asking us to stop.

When we process your personal information for our **legitimate interests**, we make sure to consider and balance any potential impact on you (both positive and negative) and your rights under data protection laws. Our legitimate business interests do not automatically override yours and we will not use your information for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted by law.

If you wish to opt out of all marketing communications or change your marketing preferences, please email <a href="mailto:funadmin@stlukes-hospice.org">funadmin@stlukes-hospice.org</a>,uk or telephone 01752 492626.

#### Who do we share your information with and why?

St Luke's promises never to sell or rent your data to any third party or share it with any third party for marketing purposes.

We may share your information with:

- HMRC (for Gift Aid claims)
- Payment processors (e.g. Paypal, Stripe)
- Event platforms (e.g. Eventbrite, JustGiving)
- Trusted IT and Information Service Providers (e.g. ID verification platform to confirm you are over 18 and eligible to enter the lottery)
- Mailing providers to send out communication on our behalf (e.g., to send you newsletters, inform you of events)

We undertake due diligence and ensure suppliers meet and comply with the data protection legislation. A full list of third parties we use can be found at <a href="https://www.stlukes-hospice.org.uk/information-protection/">https://www.stlukes-hospice.org.uk/information-protection/</a>

There may be certain circumstances, such as assisting the police with the investigation of a serious crime, where it may be necessary for the hospice to share your personal information with external agencies without your knowledge or consent.

## Where do we store your information?

We use a variety of platforms to store and process your personal information. All information will be held in accordance with the Data Protection Act 2018, UK GDPR and the Privacy Electronic Communications Regulations.

For example, we will use third party providers to record Gift Aid donations (whether this is made online or in person), to undertake face-to-face canvassing (e.g., when you are approached to make donations to the hospice).

#### International transfers

Any personal information stored outside of the UK, e.g. stored and maintained in a secure database in the United States, there is a Data Privacy Framework is in place to ensure that this can be transferred securely and adheres to the Data Protection Principles.

For any additional request to transfer your data internationally outside the UK/EU, we will make sure that an adequate level of protection is satisfied before the transfer.

## How long do we keep your information for?

We retain your personal information for as long as necessary and to meet our legal obligations. Our retention is listed below:

- Supporter contact details, donation history and Gift Aid declaration are held for 6 years from the date of the last interaction
- Event participation information is held for 3 years
- Legacy pledges are retained until the pledge is fulfilled or withdrawn.

If you have any questions about how long we keep your information, email <a href="mailto:funadmin@stlukes-hospice.org.uk">funadmin@stlukes-hospice.org.uk</a> or <a href="mailto:dpo@stlukes-hospice.org.uk">dpo@stlukes-hospice.org.uk</a> or write to St Luke's Hospice Plymouth, Stamford Road, Turnchapel, Plymouth, Devon, PL9 9XA, for attention of the Data Protection Officer.

## How do we protect personal information?

We take appropriate technical and organisational measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used.

We use a secure service when you make a donation or register for an event through our website.

You should be aware that the use of the internet is not entirely secure and although we will do our best to protect your personal data we cannot guarantee the security or integrity of any personal information which is transferred from you, or to you, via the internet. Any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features such as encryption to try to prevent unauthorised access.

## What are your rights?

## Right to be informed

You have the right to know how and why your personal data is being collected, stored and used.

That means, before (or when) we collect your data, we will tell you:

- What data we're collecting (like your name, email, or location)
- Why we're collecting it
- How it will be used
- For what purpose

## Right of access

You have a right to ask us whether we are processing information about you, and request access to this information.

Requests for 'right of access' should be directed to a member of staff or you can contact:

Data Protection Officer
St Luke's Hospice Plymouth
Stamford Road
Turnchapel
Plymouth
Devon
PL9 9XA

or email: <a href="mailto:dpo@stlukes-hospice.org.uk">dpo@stlukes-hospice.org.uk</a>

We will act in accordance with your instructions within one calendar month.

## Right to rectification

You may ask us, or we may ask you, to rectify information you or we think is inaccurate

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided us with changes, for example if you change your postal address, email address, name, payment details, or if you wish to cancel your registration, please let us know by email <a href="mailto:funadmin@stlukes-hospice.org.uk">funadmin@stlukes-hospice.org.uk</a> or telephone us on 01752 492626.

## Right to be forgotten (erasure)

Request that your information be deleted or removed where there is no need for us to continue processing it and where the retention time has passed. However, if you have made a donation we will need to keep your financial information for six years, but so far as possible, we will anonymise your record for the remainder of this period.

### Right to restriction

You have a right to ask us to restrict our processing of your information ('right to restriction') if:

- you contest its accuracy, and we need to verify whether it is accurate
- you ask us to restrict use of it instead of erasing it
- you have objected to processing of your information being necessary for the performance of a task carried out for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.

You also have the right to prevent us from processing your data for the purposes of marketing.

We will act in accordance with your instructions as soon as reasonably possible

## • Right to Portability

Ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.

## Right to Object

You have the right to say "no" to how your personal data is being used in certain situations. For example, you have the right to object to receiving marketing materials.

## Right to object to automated decisions and profiling

We do not currently use your personal data for automated decision-making or profiling that has legal or similarly significant effects on you. If we introduce

technology that automates segmentation or profiling in the future to help us better understand and engage with our supporters, we will ensure that:

- It does not produce decisions with legal or similarly significant effects without meaningful human involvement.
- You will be informed clearly about how your data is used.
- You retain the right to object to such processing at any time.

All key decisions about our fundraising and supporter engagement continue to be made by people.

## Changes to this policy

Any changes we may make to our privacy policy in the future will be posted on <a href="https://www.stlukes-hospice.org.uk/data">https://www.stlukes-hospice.org.uk/data</a> and, where appropriate, notified to you by email. Please check the website frequently to see any updates or changes to our privacy policy. By continuing to use our website you will be deemed to have accepted such changes.

#### Contact us

If you would like more information, or have any questions about this privacy policy, please contact our Supporter Care team by email at <a href="mailto:funadmin@stlukes-bospice.org.uk">funadmin@stlukes-bospice.org.uk</a> or by telephone on 01752 492626.

You can also write to us at the following address:

Data Protection Officer
St Luke's Hospice Plymouth
Stamford Road
Turnchapel
Plymouth
Devon
PL9 9XA

or email: dpo@stlukes-hospice.org.uk

## **Information Commissioner's Office**

The Information Commissioner's Office (ICO) is the body that regulates the hospice under Data Protection legislation.

If you wish to make a complaint about the way we've used your data, it's generally recommended to contact us first, so that we can try to resolve the issue directly. However, if you are not satisfied with our response or you believe we are not processing your personal data in accordance with the law, you can then proceed with a complaint to the ICO.

You can either call their helpline on 0303 123 1113 (local rate) or use their live chat service at <a href="https://ico.org.uk/global/contact-us-public/public-advice/">https://ico.org.uk/global/contact-us-public/public-advice/</a>. They are available Monday to Friday, 9am to 5pm.

Alternatively, you can write to the ICO at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5A

Or you can complete an online form at <a href="https://ico.org.uk/make-a-complaint/data-protection-complaints/">https://ico.org.uk/make-a-complaint/data-protection-complaints/</a>

This privacy policy was last updated on 30 June 2025.