

THE HABERDASHERS' COMPANY

DONOR PRIVACY NOTICE

ABOUT THIS PRIVACY NOTICE

The Haberdashers' Company (also known as The Worshipful Company of Haberdashers and including the Haberdashers' Foundation) (the "**Company**") is committed to protecting and respecting your privacy. This privacy notice sets out why we collect personal data, how we collect and use it and who it is shared with. It also explains the legal basis for the use of your personal data and the legal rights you have over the way it is used.

We may update this Privacy Notice from time to time. If we make significant changes, we will bring it to your attention directly.

WHO WE ARE AND HOW TO CONTACT US

For the purposes of the UK General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA**"), the Company is the controller of your personal data. This means that the Company determines the why and how your personal data is processed. We are registered as a controller with the Information Commissioner's Office (registration number Z7159344). The Data Protection Lead for the Company is the Director of Finance, who may be contacted via fd@Haberdashers.co.uk.

WHAT TYPES OF PERSONAL DATA WE PROCESS

The type and amount of personal data we process depends on the purposes for which we will need to use it, and may include:

- Basic identifiers, including your name, prefix, contact details (such as your email address, telephone number, address) and other relevant information (such as language preferences).
- Date of birth, to confirm you are over the age of 18.
- Information regarding past and present donations, including the amount, purpose, date and any conditions of your donation.
- Financial data necessary for us to process donations (including those by debit or credit card). These are always processed securely by trusted providers of online payment services.
- Personal data contained in any correspondence between us, including suggestions you make as to how the Company operates or does its work.
- We may process information about your place of work, position and your reasons for supporting our work.
- We may collect information about opinions, memberships, interests and affiliations including family and spouse/partner details, and relationships to anyone else who has a connection with the Company, information about your engagement with the Company, and information about where you work. We may collect this information from you, from media articles or from other publicly available sources such as Companies House, the Charity Commission, social networking sites such as LinkedIn or Facebook (please see more information in sections 4 and 5 below).
- Information relating to your attendance at or interest in events at the Company.

Special category data and criminal offences data

Certain categories of personal information are regarded by data protection law as more sensitive than others. Known as 'special category personal data', this relates to information about your health, racial or ethnic origin, details of sexual life, sexual orientation, religious beliefs, political opinions or any genetic or biometric data that is used to identify you. This information, and any information about criminal offences / convictions and related security measures, warrants a higher level of protection under data protection law.

Given the nature of our work, the Company may process special category data about you, including:

- Religious or philosophical belief if you choose to provide this when making a donation.
- Information about health (for example, information about food allergies if you are attending an event that we are catering).

When we collect this type of information from you, we will always make it clear what special category personal data we are collecting and why.

HOW WE COLLECT YOUR PERSONAL DATA

We collect your personal data in the following ways:

- **Information you give us directly:** you may provide your personal data when you interact with us in any of the scenarios outlined above, for example when you:
 - make a donation;
 - sign up to receive news about our activities;
 - enquire about our activities or services including via our website, email, telephone, SMS, social media or post;
 - take part in a survey conducted by the Company; or
 - communicate with us and provide us with information.

When we collect personal data directly from you, we will make it clear whether you are required by law or under a contract, to provide your personal data, and what will happen if you do not provide that data.

- **Information collected when you use our website:** when you use our website, some information about you may be recorded and temporarily stored.
- **Information shared by third party organisations:** we may receive information about you from third party partners with whom you engage, for example websites such as JustGiving when you donate. This may include information such as your name, contact information, and whether you are a taxpayer so we can claim gift aid.
- **Publicly available information:** we may collect information from publicly available sources, including social media sites (for example X, LinkedIn, Facebook and Instagram), Companies House, the Charity Commission, company websites or other third parties.

HOW WE USE YOUR PERSONAL DATA

We will use your personal data for various purposes consistent with the legal basis we rely on. These purposes include:

- Processing and administering donations you make, including processing for gift aid purposes;
- Communicating with you, for example to acknowledge receipt of your donation or to provide additional information you may have requested;
- Organising activities you have told us you may wish to be involved in;
- Sending you communications that may be of interest, including information about our events and activities, campaigns and appeals asking for donations and other fundraising activities and initiatives for which we seek support;
- Sending you communications about Company fundraising activities, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support;
- Seeking your views on the events, services, communications or activities we conduct so that we can make changes or improvements;
- Maintaining our organisational records and ensuring they are accurate, up to date and we know how you prefer to be contacted;
- Carrying out analysis of our donor database, including reviewing historical donations in order to find new donors or to increase engagement of existing donors with the Company. For example, this may include inviting prospective donors to events, or contacting past donors about new opportunities for

donation where they have expressed an interest in our work.

Failure to provide personal data

When we collect personal information, we will make it clear whether you are required by law, or under a contract, to provide your personal data, and what will happen if you do not provide that data.

OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA

Data protection law requires us to have a legal basis for processing your personal data. Depending on the purposes for which we use your data, we may rely on one of the following legal bases:

- **Consent:** Here you have provided your consent for us to use your personal data, for example, if you sign up to receive events and fundraising communications from us. You may withdraw consent at any time by emailing us at fd@haberdashers.co.uk. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- **Performance of a contract:** It may be necessary for us to use your personal data to carry out our obligations under a contract entered into with you or to take steps you ask us to take prior to entering into a contract. This is what we rely on when carrying out administrative activities relating to your donation (such as processing your donation and issuing receipts).
- **Legal obligations:** It may be necessary for us to use your personal data to comply with our legal obligations. For example, we are legally required to retain transaction details for gift aid or accounting/tax purposes.
- **Legitimate interests:** It may be necessary for us to share or use your personal data for the purposes of “legitimate interests” pursued by the Company or a third party (as long as those legitimate interests are not overridden by your rights and freedoms). We may also receive data from this list of partners. Examples include:
 - Providing individual thank you notes to donors;
 - Planning future fundraising campaigns by looking at information about past donors, such as location, levels of giving or interests;
 - Inviting existing donors to increase their engagement with the Company;
 - Researching and reaching out to prospective new donors;
 - Where images and video are taken at events of members, stakeholders or visitors;
 - Sending you printed editions of The Haberdasher magazine or other printed materials;

Special category data

We will only process special category data where we have also identified an appropriate condition for doing so in accordance with Article 9 of the UK GDPR and the DPA 2018. An appropriate condition will be satisfied where:

- you have provided **explicit consent** (such consent may be withdrawn at any time by emailing fd@haberdashers.co.uk)

When processing these categories of personal data, will ensure that appropriate safeguards are implemented in accordance with the UK GDPR and the DPA.

HOW WE KEEP YOUR PERSONAL DATA SAFE

We understand how important it is to protect your personal data and take appropriate steps to safeguard it.

We implement adequate technical and organisational measures to ensure a level of security appropriate to the potential risks. We have an internal Data Protection Policy, which governs how we protect your personal data. For example:

- all persons authorised to access personal data are required to undergo appropriate training and must comply with security measures that we have put in place;

- We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- To mail printed versions of The Haberdasher to your address if you have specified a wish to receive it.

Please note, we interact via the internet and email, and no external data transmission over the internet can be guaranteed to be 100% secure. While the Company strives to safeguard your personal data and mitigate any risks as far as possible, we cannot guarantee the security of the information you provide online and you do this at your own risk. If you would like more information about the security measures we have implemented please contact us.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

We will not share your personal data with third parties without your consent unless the law allows us to. We may disclose your personal data to the following third parties, to enable us to provide our services, fulfil our charitable objectives or comply with our legal obligations:

- Haberdashers' schools;
- Charities in receipt of grants from the Company;
- service providers we use in connection with the management of our donor database and communicating with you (for example, [sending out marketing emails on our behalf]);
- service providers we use in connection with our internal accounting and compliance systems;
- third parties to whom we are required to do disclose personal data under a legal obligation (for example for the purposes of fraud prevention or tax compliance);
- we may use the personal information (never special category data) that you supply to us and work with other third-party controllers to achieve our fundamental business objectives. These controllers will rely on your consent to process your personal data and send you printed information from us. For example, our printers, In Print Digital Solutions LTD. require your consent to send you The Haberdasher magazine in print. We have GDPR Data Protection contract in place with this business, signed by both parties. You may withdraw your consent at any time by emailing fd@haberdashers.co.uk
- third parties in connection with or as a result of restructuring or reorganisation of our operations. In such event we will require that third party commits to protecting your personal data and privacy rights;
- we may also need to disclose personal data to other third parties that provide services for us, for example our legal advisors or accountants. We select all our service providers with care and only share with them the minimum amount of data required to provide their service. Where appropriate, we put appropriate agreements in place that require third parties to comply with data protection laws and protect your personal data with the same care as we do.

TRANSFERS OF PERSONAL DATA TO OTHER COUNTRIES

We do not transfer your personal data outside the UK.

KEEPING YOUR PERSONAL DATA UP TO DATE

We take care to ensure that your personal data we hold is up to date and we would really appreciate it if could you let us know when your contact details change. Periodically, we will issue a membership survey inviting you to update your information. In between these formal surveys, you can do so by contacting us at fd@haberdashers.co.uk.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will hold your personal data only for as long as it will be necessary to fulfil the purposes of processing. We normally hold records of donations for at least six years so we can fulfil our statutory obligations

for tax purposes. If you would like further information about our retention periods, please contact the Director of Finance at fd@haberdashers.co.uk.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. We may periodically ask you to renew your consent. If you ask us to stop contacting you with details of events or fundraising information, we will keep a record of your contact details on our marketing suppression list to ensure we comply with your request.

AUTOMATED DECISION-MAKING AND PROFILING

Automated decision-making is when a computer or similar electronic system uses personal data to make decisions about people without any human involvement. Profiling involves collecting various pieces of information about a person in order to analyse or evaluate certain aspects relating to that person or to make predictions about them (for example, how that person may behave or what their preferences are). Automated decision-making does not have to involve profiling, though it often will.

We do not use your personal data in automated decision-making, including profiling (i.e. we do not make decisions about you by way of automated means without human involvement).

YOUR RIGHTS

You have the following rights in relation to your personal data:

- **Right to be informed** – You have a right to information about how we collect and use your personal data (this is contained within this privacy notice).
- **Right of access to your personal data** (commonly known as a "subject access request") – You can ask us to confirm if we process your personal data, request a copy of your personal data and certain information to check that we are processing your data lawfully. This right always applies but there are some exceptions which mean you may not always be entitled to a copy of all of your personal data that we hold.
- **Right to rectification** – You can ask us to correct any information about you if you think it is wrong, or to update or complete information if you think it's incomplete.
- **Right of erasure** – You can ask us to erase information about you in some circumstances although there might be reasons why we cannot do this.
- **Right to restrict our processing of your personal data** – You can ask us to stop processing your personal data, for example if you want us to establish its accuracy or you are questioning our legal basis for processing it. This right only applies in certain circumstances.
- **Right to object** – You can object to our use of your personal data in certain circumstances. Please note, you always have a right to object to processing of your personal data for direct marketing purposes.
- **Right to data portability** – You can ask us to transfer your personal data to you or to another organisation free of charge and in a structured, commonly used format which is openly accessible to software (such as a CSV file). This right only applies where we hold your personal data to fulfil a contract or because we have gained your consent.

To make a request, please contact the Director of Finance at fd@haberdashers.co.uk.

YOUR RIGHT TO COMPLAIN

We seek to apply high standards to the protection of your personal data. However, if you are not happy with the way in which we have processed your personal data or dealt with your request, then please contact the Director of Finance at fd@haberdashers.co.uk in the first instance. You can also complain to the Information Commissioner's Office via:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Further details can be found at <https://ico.or.uk/make-a-complaint/>.

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice will be revised and updated from time to time to reflect any changes to the way we handle your personal data or new legal requirements. We will advertise any changes on our website or, if the changes are material, we will bring them to your attention directly. If you subscribe to our mailing list, a link to the most up to date version of this Privacy Notice will be included at the bottom of each email.

This Privacy Notice was last updated in October 2023.

Date of last review:	November 2023	Date of next review:	<i>October 2024</i>
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