



## **Privacy and cookie policy**

This Privacy Policy sets out the data processing practices of Purity Fundraising Ltd. Please note that all data thus captured will be used and held in accordance with the requirements of the Data Protection Act 2018 and GDPR.

Purity Fundraising is a charity telephone fundraising agency which works in conjunction with charities to highlight the work they do and raise funds for continuing projects around the world.

Purity Fundraising Ltd is the processor and our Data Protection Officer is Graham Beattie. If you have any requests concerning your personal data or any queries with regards to how we handle your data you can contact the DPO by phone on 01273 666866, email [graham@purityfundraising.com](mailto:graham@purityfundraising.com) or write to us at Graham Beattie, Purity Fundraising Ltd, HQ Tower Point, 7<sup>th</sup> Floor, 44 North Rd, Brighton, BN1 1YR

## **Purpose of processing your personal data**

<b>Activity</b>	<b>Purpose of processing</b>	<b>Lawful basis</b>
Contacting you by telephone	Provide you with information and ways in which you can help the charity you support.	Legitimate interests
Contacting you by telephone	Complete market research about an organisation of which you are a member	Legitimate interests

## **The legal basis on which we rely are:**

### **Compliance with a legal obligation**

We are required to collect from you, certain personal details for the purposes of fulfilling a gift aid declaration. These include, your full name, date of birth and current address.

### **Legitimate interests**

We are a Data Processor for our client charities, who remain the Data Controllers in respect of your Data in relation to your charity support. We may receive your personal data as a charity supporter of one of our client charities and use this data to make contact with you, to discuss your support of charities.

We have a legitimate interest on the basis that this is the nature of our business and contact with you is in our commercial interest

### **1. Marketing**

We will never use the personal data you have provided us with for marketing purposes, nor will it be passed to any third parties for marketing purposes.

### **2. Recipients/categories of recipients**

In carrying out our business including our obligations to you, we may use sub-contractors. These will be dialler providers and data cleansing agencies which are used for compliance with TPS regulations. We will ensure that they respect your privacy and abide by all data protection laws.

### **3. Transfers to third countries**

As part of our processing activities we do not transfer your details to anywhere outside of the UK

### **4. Retention periods**

We will keep your personal data in connection with the agreements you have made for 3 months after the agreement was made. We need to retain this data for our own accounting purposes and for legal and tax purposes.

In terms of retained personal data, this will not be used for marketing purposes.

### **5. Call Recording**

All calls made on behalf of our clients to their supporters are recorded for quality monitoring purposes. These will also be used to verify whether a potential complaint is to be upheld. Call recordings are retained for 3 months. This may change as stipulated by the client we are under contract to.

### **6. Data subject's rights**

You have rights in respect of your personal data. We will need to confirm your identity before we can consider your request so, if you wish to exercise any of these rights, we will need 2 forms of identity to ensure you are the data subject. These can be passport, driving licence, utility bill or bank statement.

**The right to be informed** – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with. If you have any questions on how and why we process your data, please contact the DPO. If you want to know more about this right, the Information Commissioner's Office has more guidance on their website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

**Right of access** – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

**Right to rectification** – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

**Right to erasure** – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>

**Right to restrict processing** – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DP at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

**Right to data portability** – you have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and that processing is by automated means. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

**Right to object** – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

- (i) Legitimate interests/legal task – your objection should be based on the situation pertaining to you/your own personal situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
- (ii) Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.
- (iii) Scientific/historical research and statistics - your objection should be based on the situation pertaining to you/your own personal situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>

**Rights relating to automated decision making including profiling** – you have the right in respect of automated decision making, including profiling. Where we carry out solely automated decision making, including profiling, which has legal or similarly significant effects on you, we can only do this if it is in connection with a contract with you, we have a right under law or you have provided your explicit consent. We will tell you if this happens and tell you how you can request human intervention or challenge the decision. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

#### **7. Processing based on consent**

Where we process your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by contacting the DPO at the contact details above.

#### **8. The right to lodge a complaint to the supervisory authority**

If you are unhappy with any aspect of our handling of your data, you can make a complaint to the ICO - <https://ico.org.uk/concerns/>

#### **9. Automated decision making including profiling**

Purity Fundraising will not use automated decision making or profiling

#### **10. Cookies.**

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on <http://www.allaboutcookies.org/>

Purity Fundraising do not use cookies on their website.

#### **11. Third party websites.**

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

#### **12. Changes to the privacy policy.**

This privacy policy is regularly reviewed and will be updated when necessary. If we make any significant changes to the policy, we will communicate these to you.