

CHUF Privacy Policy

Updated: February 2021

CHUF respects your privacy and is committed to protecting your personal data and/or your child's personal data (as applicable). This privacy policy will inform you as to how we look after your personal data and/or your child's personal data (as applicable) and tell you about your privacy rights and how the law protects you and your child.

IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy aims to give you information on how CHUF collects and processes your personal data and/or your child's personal data (as applicable), including any data you may provide through this website when you sign up to our newsletter, register for one of our events or use the contact form to get in touch with us.

This website is not intended for use by children. However, we do collect some personal data relating to children if you provide it to us and give your consent to us processing your child's personal data and we have been able to undertake reasonable steps to confirm that you have parental responsibility for the child. When we refer to someone with parental responsibility for a child we mean someone who, according to the law in the child's country of residence, has the legal rights and responsibilities for a child that are normally afforded to parents. This could include a child's carer.

We store your child's personal data as part of your personal record on our internal computer systems. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

CHUF is the data controller and is responsible for your personal data and/or your child's personal data (as applicable) (referred to as "CHUF", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy or our privacy practices, including any requests to exercise your legal rights or your child's legal rights, please contact us in the following ways:

- **Full name of legal entity:** CHUF (registered as a charitable incorporated organisation with company number CE003673 and charity number 1160831)
- **Email address:** info@chuf.org.uk
- **Postal address:** Nelson House, Fleming Business Centre, Burdon Terrace, Jesmond, Newcastle upon Tyne NE2 3AE
- **Telephone number:** 0191 281 3166

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on the date stated at the beginning of the policy. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data and/or your child's personal data (as applicable) changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU AND YOUR CHILD

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you and/or your child (as applicable) which we have grouped together as follows:

Identity Data	includes first name, last name, title, date of birth and gender.
Special Category Data	includes age and details of physical illness or medical condition.

Contact Data	includes email address and telephone numbers and billing address in relation to donations made by you.
Profile Data	includes donations made by you and your or your child's interests, preferences, feedback and survey responses.
Financial Data	includes bank account and payment card details in relation to donations made by you.
Transaction Data	includes details about payments made as donations from you
Marketing and Communications Data	includes preferences in receiving marketing from us and our third parties and your communication preferences.
Technical Data	includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices used to access this website.
Usage Data	includes information about how you use our website and services, the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our contact number.

We may collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data and/or your child's personal data (as applicable) but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data and/or your child's personal data (as applicable) so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or enable you to attend one of our events). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

SPECIAL CATEGORY PERSONAL DATA

Some of the personal data we may collect about you and/or your child (as applicable) is considered to be sensitive and requires a higher level of protection. This may include your or your child's age and details of physical illness or medical condition. We need to have further justification for collecting, storing and using this type of personal data.

We will only process special categories of personal data in limited circumstances with your explicit written consent. When we seek your explicit written consent, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. This will usually be as part of our Heart Heroes programme.

You should be aware that it is not a condition of your arrangement with us that you agree to any request for consent from us.

We do not need your consent where the purpose of the processing special category personal data is to protect you or another person from harm or to protect your well-being and if we reasonably believe that you need care and support, are at risk of harm and are unable to protect yourself.

HOW WE COLLECT PERSONAL DATA

We use different methods to collect data from and about you and/or your child (as applicable).

Direct interactions with you

By filling in forms on our website or by corresponding with us by post, phone, email or otherwise, you may give us your or your child's Identity, Special Category, Contact or Profile Data and your Financial, Transaction and Marketing and Communications Data when you:

- register to attend one of our events;
- subscribe to our newsletter or other publications;
- make a donation;

- request information or marketing to be sent to you; or
- give us feedback, complete a survey or contact us.

Automated technologies or interactions

As you interact with our website, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies (which may include server logs). We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties or publicly available sources

We may receive Technical Data about you from various third parties including analytics and search information providers such as Google based outside the UK.

HOW WE USE PERSONAL DATA

We will only use your personal data and/or your child's personal data (as applicable) when the law allows us to. Most commonly, we will use your personal data and/or your child's personal data (as applicable) in the following circumstances:

- **where it is necessary for our legitimate interests.** This means the interest of our charity in conducting and managing our charity to enable us to give you the best service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data and/or your child's personal data (as applicable) for our legitimate interests. We do not use your personal data and/or your child's personal data (as applicable) for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **where we need to perform a contract that we have entered into with you.** This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **where we need to comply with a legal obligation.** This means processing your personal data and/or your child's personal data (as applicable) where it is necessary for compliance with a legal obligation that we are subject to.

We will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We rely on consent as a lawful basis for processing your personal data and/or your child's personal data (as applicable), as set out in the special category personal data section above.

Purposes for which we will use your personal data and/or your child's personal data (as applicable)

We have set out below, in a table format, a description of all the ways we plan to use your personal data and/or your child's personal data (as applicable), and which of the legal bases we rely on to do so.

We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data and/or your child's personal data (as applicable) for more than one lawful basis depending on the specific purpose for which we are using it.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data and/or your child's personal data (as applicable) where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing
To process any donations you make	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to receive donations and claim Gift Aid (where applicable))
To manage our relationship with you, which will include providing you with information you have requested including our newsletter, notifying you about changes to our terms or privacy policy and asking you to provide feedback or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how you use our services, to develop them and grow our charity)

<p>To enable you to attend one of our events</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>Performance of a contract with you</p>
<p>To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a charity reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our charity and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, experiences and our relationship with you</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to keep our website updated and relevant, to develop our charity and to inform our marketing strategy)</p>

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our charity)
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Marketing and promotional information

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a donation made, event attended or other experience provided.

Change of purpose

We will only use your personal data and/or your child’s personal data (as applicable) for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data and/or your child’s personal data (as applicable) for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data and/or your child’s personal data (as applicable) without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to use our donation systems.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed.

We do not share the information collected by the cookies with any third parties.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

DISCLOSURES OF PERSONAL DATA

We may share your personal data and/or your child's personal data (as applicable) with the third parties set out below for the purposes set out in the table in the 'How we use your personal data and/or your child's personal data (as applicable)' section above.

- Service providers acting as processors who provide IT and system administration services.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.
- Third parties to whom we may choose to sell, transfer or merge parts of our charity or our assets. Alternatively, we may seek to acquire other charities or businesses or merge with them.

If a change happens to our charity, then the new owners may use your personal data and/or your child's personal data (as applicable) in the same way as set out in this privacy policy.

- Third parties to whom we are under a duty to disclose or share your personal data and/or your child's personal data (as applicable) in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of our donors, or others.
- Professional advisers such as lawyers, bankers, auditors and insurers based in the UK who provide consultancy, legal, banking, accounting and insurance services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and/or your child's personal data (as applicable) and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data and/or your child's personal data (as applicable) for their own purposes and only permit them to process your personal data and/or your child's personal data (as applicable) for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We may transfer your personal data and/or your child's personal data (as applicable) with third parties that are located outside the UK.

Whenever we transfer your personal data and/or your child's personal data (as applicable) out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data and/or your child's personal data (as applicable) to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data and/or your child's personal data (as applicable) out of the UK.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data and/or your child's personal data (as applicable) from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data and/or your child's personal data (as applicable) to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data and/or your child's personal data (as applicable) on our instructions, and they are subject to a duty of confidentiality.

We have 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.

DATA RETENTION

We will only retain your personal data and/or your child's personal data (as applicable) for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data and/or your child's personal data (as applicable) for a longer period in the event of a complaint.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and/or your child's personal data (as applicable), the purposes for which we process your personal data and/or your child's personal data (as applicable) and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law, for tax purposes, we have to keep some of your personal data and/or your child's personal data (as applicable) for seven years from the end of the tax year or accounting period to which it relates.

This will apply to Gift Aid declarations and associated Identity and Contact Data, and Financial and Transaction Data.

In some circumstances you can ask us to delete your personal data and/or your child's personal data (as applicable). Please see the 'Your legal rights' section below for further information.

In some circumstances we will anonymise your personal data and/or your child's personal data (as applicable) so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you and your child have rights under data protection laws in relation to your personal data and/or your child's personal data (as applicable). You and your child each have the right to:

- **Request access to your personal data and/or your child's personal data (as applicable)** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and/or your child (as applicable) and to check that we are lawfully processing it. You can make this request on behalf of your child provided we are able to undertake reasonable steps to confirm that you have parental responsibility for the child.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data and/or your child's personal data (as applicable).** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data and/or your child's personal data (as applicable) where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data and/or your child's personal data (as applicable) to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data and/or your child's personal data (as applicable)** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data and/or your child's personal data (as

applicable) for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing of your personal data and/or your child's personal data (as applicable).** This enables you to ask us to suspend the processing of your personal data and/or your child's personal data (as applicable) in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data and/or your child's personal data (as applicable) to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data and/or your child's personal data (as applicable) in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data and/or your child's personal data (as applicable). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data and/or your child's personal data (as applicable) (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive, or you request further copies of your personal data and/or your child's personal data (as applicable) following a previous request. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data and/or your child's personal data (as applicable) (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.