



St Andrew's Club Privacy Policy for Supporters **February 2019**

1. The aim of this Privacy Policy

Our supporters - individuals, companies, trusts, foundations or livery companies - are extremely important to us, and this Privacy Policy explains how St Andrew's Club collects, stores, manages and protects your data. It outlines the types of data that we hold and how we use them to communicate with our supporters. We aim to be clear when we collect your personal information, and not do anything you would not reasonably expect. We will review this Privacy Policy annually.

2. Who we are and what we do

2.1 St Andrew's Club is a voluntary-funded community-based youth club. To do this we fundraise to keep the Club alive and thriving each year and to ensure both our core and capital costs are covered. We do this by applying to grant-making charitable trusts and foundations and by building relationships with individual and corporate supporters, and prospective supporters, through a range of social, networking and fundraising events, appeals and challenges each year. We keep those supporters in touch with the scope and impact of our work through newsletters, both printed and electronic.

2.2 In order to do this, we have a database that contains personal data collected by St Andrew's Club from individuals who have made a donation, taken part in our events, referred to us by another supporter, have signed up to receive our newsletter via the website or have expressed an interest in hearing more about the Club and its work. We always aim to keep your details up to date, and we will conduct projects to check the contact details we have for you are correct, and, where appropriate, update them. As a result, some of the data may also have been obtained from publicly available sources – for example, we may find a new address for you by using the Royal Mail's National Change of Address database (NCOA). We may also use information from publicly available sources to carry out research to assess your inclination and capacity to support St Andrew's Club financially or by volunteering your time. More information on these activities is below and you will always have the right to opt out. We value our relationship with you and we use your personal data to ensure we contact you in the most appropriate way, improve our services and to ensure we work efficiently and effectively.

2.3 St Andrew's Club is the Data Controller, which means we determine the purposes and means of processing personal data. We are also a Data Processor, meaning we are responsible for processing personal data on behalf of the Controller. St Andrew's Club Information Governance policy is available on our website.

3. Our responsibilities and legal basis for processing your data

3.1 As part of our work we process and store personal information relating to current and potential supporters and friends of St Andrew's Club and we therefore adhere to GDPR (European General Data Protection Regulation 2016/679). We take our responsibilities under this regulation seriously and ensure the personal information we obtain is held, used, transferred and processed in accordance with the regulation.

3.2 We also abide by the Privacy and Electronic Communications Regulations (PECR), which sits alongside the GDPR (European General Data Protection Regulation 2016/679). This gives people specific privacy

President

The Rt Hon. the Lord Strathclyde CH PC

Chairman

Elizabeth Cuffy JP

Deputy Chairman

Anthony Scott

General Manager

Paul Whittle

Vice Presidents

The Earl of Selborne GBE DL FRS, Christabel Dimmock, The Very Reverend Dr John Hall, Ray Mingay CMG
Michael Passmore, Peter Scott, Sir David Sieff, Canon Christopher Tuckwell, Barry Walsh



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rights in relation to electronic communications and St Andrew's Club will ensure it complies with the relevant areas the PECR covers:

- Marketing by electronic means, including marketing calls, texts and emails. PECR applies to us as we market by email;
- The use of cookies or similar technologies that track information about people accessing a website or other electronic service. PECR applies to us as we use cookies on our website. Their use is covered in the website Privacy Policy and visitors are alerted to them by a Cookie Pop Up.

3.3 St Andrew's Club processes the information outlined in this Privacy Policy either because you have given us your *consent* or in pursuit of our *legitimate interests* where this is not overridden by your interests and rights or freedoms:

- Communicating with current and potential supporters
- Furthering the St Andrew's Club charitable mission (which includes fundraising and securing the support of volunteers);
- Enabling St Andrew's Club to achieve its strategic and operational goals.

We may pursue these *legitimate interests* by contacting you by telephone, post or social media. Your *consent*, and information about how you can manage the ways that we contact you, including how to opt in/out from some or all contact from St Andrew's Club, is outlined in the 'Your rights' section below.

4. The data we hold

St Andrew's Club maintains a record of current, former and prospective supporters. The personal data we store and process, the majority of which is given to us by our supporters but some of which we may obtain from other sources, may include:

- name, title, gender and date of birth;
- contact details including postal address, email address, phone number and links to social media accounts;
- your occupation and professional activities;
- your recreations and interests;
- family and spouse/partner details and your relationships to other supporters;
- records of donations and Gift Aid status, where applicable (as required by HMRC);
- records of communications sent to you by St Andrew's Club or received from you;
- volunteering by you on behalf of St Andrew's Club;
- information about your wealth (although we will **never** carry out wealth screening, a process which uses third-party partners to automate some of this work);
- media articles about you;
- information on your engagement in St Andrew's Club, events, groups or networks;
- bank details from cheques received/ standing orders set up

St Andrew's Club does not store any credit/debit card details.



5. How we use your data

5.1 Unless you have requested otherwise, your data are accessible to St Andrew's Club and may be used and processed for a full range of engagement and fundraising purposes. These include the following communications and marketing activities, which may be sent by mail, email, telephone and social media, as requested by you:

- an e-newsletter up to 6 times a year
- a printed newsletter 3 times a year
- occasional impact reports/fundraising appeals
- occasional event invitations by email/post: yes/no

5.2 St Andrew's Club may use third-party partners to support the activities described above. If you interact with the St Andrew's Club through a third party (for example, supporting St Andrew's Club via Virgin Money Giving) then we may obtain information about you from that third party. The receipt of data by St Andrew's Club in this manner is subject to the third party's own privacy policy.

Here is a list of parties with whom we partner in this way, with a link to their own Privacy Policies:

- On-line donation platform: Virgin Money Giving - <https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp>
- Cloud-based fundraising customer relationship marketing database: Donorfy - <https://donorfy.com/privacy-policy/>
- Cloud-based automated e-mail marketing service: MailChimp - <https://mailchimp.com/legal/privacy/>
- Outdoor fundraising challenge events organiser: Virgin London Marathon - <https://www.virginmoneylondonmarathon.com/en-gb/privacy-policy/>
- Outdoor fundraising challenge events organiser: Prudential RideLondon-Surrey - <https://www.prudentialridelondon.co.uk/privacy-policy/>
- Outdoor fundraising challenge events organiser: Action and Adventure Challenge - <https://www.actionchallenge.com/terms-conditions>
- Outdoor fundraising challenge events organiser: Global Adventure Challenges - <https://www.globaladventurechallenges.com/privacy-policy>
- On-line shopping fundraising platform and registered charity: Giving Machine - <https://www.thegivingmachine.co.uk/privacy-policy/>
- On-line shopping fundraising platform: Amazon Smile – <https://www.amazon.co.uk/gp/help/customer/display.html?nodeId=502584>
- On-line event management platform: Eventbrite - <https://www.eventbrite.co.uk/support/articleredirect?anum=8478>
- On-line auction platform for charities: Givergy – <https://www.givergy.com/site-policies> and <https://www.givergy.com/terms-and-conditions>

Data obtained in this way are treated no differently to any other once held by St Andrew's Club, and are bound by the terms of this Privacy Policy as soon as they are received.

5.3 Tools may be used to help us improve the effectiveness of St Andrew's Club communications with you, including tracking whether the emails we send are opened and which links are clicked within a



message. We monitor website visits and use tools such as Google Analytics to improve our website and services, which has its own Privacy Policy : <https://www.google.com/policies/privacy/partners/>

6. How we gather and update your data

6.1 St Andrew's Club was founded with the help of philanthropy, and philanthropy continues to make an enormous impact at St Andrew's Club. As we are a fundraising charity we may gather information about you from publicly available sources – for example, Companies House, the Electoral Register and the media – to help us to understand more about you as an individual and your ability to support St Andrew's Club, including financially. We will **never** carry out wealth screening, a process which uses third-party partners to automate some of this work. We may use information gathered from public sources alongside the information you provide to undertake analysis of who might support St Andrew's Club and to understand the preferences of our supporters about events, communication and services. By doing this, we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you. We also use publicly available sources to carry out due diligence on donors in line with the St Andrew's Club's Gift Acceptance Policy and to meet money laundering regulations.

6.2 Fundraising is a key part of St Andrew's Club's work, and we are committed to working in a transparent, ethical, responsible and honest way. To reflect this commitment, we are a member of the [Fundraising Regulator](#) and committed to the Regulator's [Code of Practice](#); and we will also always abide by the [Fundraising Regulator's Promise](#).

7. Protecting your data

7.1 We are committed to holding your data securely and treating them with sensitivity. All data are held securely and in accordance with the GDPR (European General Data Protection Regulation 2016/679). Supporter data are held on Donorfy, a secure cloud-based database. You can read Donorfy's security notice here: <https://donorfy.com/security>. Bank details and original Gift Aid declarations are stored securely in locked files.

7.2 Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside St Andrew's Club other than those which are acting as agents for St Andrew's Club (for example, if we use an external mailing house to print and send our newsletters). All external entities with whom data are being shared and to whom we are not legally bound must sign a contract and/or a confidentiality and non-disclosure agreement before any data transfer takes place. We do not share with, sell to or trade your data with any other organisations.

7.3 Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers are located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

8. Your rights

St Andrew's Club considers its relationship with supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. You will always have the right to:



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- Be informed as to how we use your data (via this Privacy Policy);
- Access or request a copy of the data we hold about you;
- Update, amend or rectify the data we hold about you – you can manage your own data via the email link at <https://www.standrewsclub.com/index.php/about-us/our-policies>
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from St Andrew's Club
- Ask us to suppress your data from our records;
- Withdraw consent, where it is used as a legal basis for processing;
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you have any questions about this Privacy Policy, or would like to receive a copy of the information we hold about you, please contact us at:

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9. Future changes

From time to time, we may use your information for new purposes not currently described in this Privacy Policy. If our information practices change at some time in the future, we will always post the policy changes on this page.

Last updated on: 27 February 2019