



Fundraising and Communications Data Protection and Privacy Policy

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- If you have any questions about this Fundraising and Communications Data Protection and Privacy Policy or our Ethical Fundraising Policy and Pledge, please contact Rob Anderson our Fundraising and Development Coordinator: randerson@ch1889.org
- For more information about our Corporate Data Protection and Privacy Policy, Jan O'Day our Director of Corporate Services and Data Protection Officer: joday@ch1889.org



1. Introduction

- a) Cambridge House pursues a vision of a society without poverty where all people are valued, treated equally and lead fulfilling and productive lives.
- b) We are an independent social action charity that works to tackle poverty and promote social justice:
 - Company limited by guarantee no.105006 and registered charity no.265103.
 - Address: Cambridge House, 1 Addington Square, London SE5 0HF
- c) Cambridge House aims to tackle poverty and social injustice and to achieve this we seek funding from a range of sources and communicate with the public for a range of reasons, including promoting our aims and values and campaigning on issues that are relevant to our mission.
- d) Cambridge House is committed to:
 - Being open, honest, fair and accountable.
 - Ensuring all fundraising and communications:
 - Complies with relevant legislation, including legislation on data protection, money laundering and bribery, and government guidance in relation to acts of terrorism and political activity.
 - Is consistent with best practice and with the guidelines provided by the Institute of Fundraising and the Charity Commission.
- e) This policy has been drawn up to provide guidance to on how we do this to comply with legislation on data protection and privacy, including the General Data Protection Regulation (GDPR).
- f) We have a separate Corporate Data Protection and Privacy Policy which you can find on our website or request from **Jan O'Day our Director of Corporate Services and Data Protection Officer: joday@ch1889.org**
- g) We also have an Ethical Fundraising Policy and Pledge which can be found on our website or request from **Rob Anderson our Fundraising and Development Coordinator: randerson@ch1889.org**

2. Data protection in fundraising and communications

- a) We communicate with our supporters for several reasons and in different ways. These include fundraising, campaigning and promotional activities.
- b) As outlined in our Fundraising Pledge, we do not use fundraising techniques such as telemarketing or door-to-door collections or outsource to fundraising agencies.
- c) However, some of our fundraising activities fall under the definition of 'Direct Marketing' as defined in the Data Protection Act. The Information Commissioners Office also includes activities that promote an organisation's aims and ideals as direct marketing, meaning that any campaigning or awareness raising work we do also falls under direct marketing.

3. How we protect and respect the data of people who share their data with us

We will ensure individuals are:

- a) Treated fairly by ensuring that all individuals who we seek to obtain personal information from:
 - Know who we are
 - Know about our proposed use(s) of their personal information and the legal basis for that processing (i.e. giving their specific unambiguous consent)
 - Know how long we will retain their information for this purpose
 - Are aware of any other relevant information about the specific circumstances in which their data would be processed
 - Are confident that the personal data we process are adequate, relevant and limited to what data we need for the purpose consent was given
- b) Can use their rights to manage their personal information by
 - Ensuring they have the appropriate information to access the information we hold on them by making a Data Subject Access Request
 - Providing information on how to lodge a complaint with a supervisory body such as Information Commissioners Office or the Charity Commission.
 - Maintaining a 'Suppression List' with the minimum information required to enable us to adhere to the wishes of individuals who do not want to receive Direct Marketing from us.

4. How we process data lawfully

- a) In accordance with GDPR Art. 5(1)(b) we ensure that personal data are “collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.”
- b) We will obtain explicit consent wherever required and will ensure that even implied consent is freely given, specific and informed and must involve a positive action indicating agreement. In line with best practice, we will also try to secure this even if not strictly required. When gaining consent, we will ensure that we are obtaining it in a way that is:
 - Displayed clearly and prominently
 - Asks individuals to positively opt-in
 - Gives them sufficient information to make a choice about whether to consent based on the specific and disambiguated purpose(s) for which are seeking to obtain their personal information
- c) We will retain a record of consent such as a form or digital record. In the case of verbal consent, we will retain a note of when verbal consent was obtained and what privacy information was provided.
- d) We will also ensure we refresh consent with individuals within a reasonable timescale of no more than 36 months for non-fundraising activities, and 24 months for fundraising activities, especially if we contact individuals frequently (more than once a month). We also commit to refreshing consent if circumstances change, for example if our activities change significantly or we need to contact individuals more frequently.
- e) We will take reasonable steps to ensure personal data is accurate and, as appropriate within the law and best practice, is kept up to date.
- f) We will delete or archive data after the specified period unless we have lawful basis to do otherwise such as refreshed consent.

5. How we ensure personal data is secure

We will ensure that:

- a) personal data is stored securely using modern software that is kept-up- to-date b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- b) When personal data is deleted this should be done safely such that the data is irrecoverable.
- c) Appropriate back-up and disaster recovery solutions are in place

6. Implementation of our data protection policy

Putting the above principles and commitments into practice, the below framework provides an overview of our fundraising and communications activities involving personal information, how we process data, and how we ensure we do so lawfully, fairly, and transparently:

Direct marketing activity:	How we communicate with people:	How we will know we can communicate with people:	Consent must be refreshed or data deleted after:
Individual donor fundraising	Email	Explicit positive consent	24 months
	Post	Explicit positive consent	24 months
	Live Phone Call	Explicit positive consent	24 months
Newsletters	Email	Explicit positive consent	24 months
	Post	Requires justified collection of data plus consent and/or Legitimate Interest	36 months
Events and promotional activities	Post	Requires justified collection of data plus consent and/or Legitimate Interest	24 months
	Email	Explicit positive consent	24 months
	Live Phone Call	Explicit positive consent	24 months
Campaigns	Post	Requires justified collection of data plus consent and/or Legitimate Interest	24 months
	Email	Explicit positive consent	24 months
	Live Phone Call	Explicit positive consent	24 months
Challenge event or volunteer recruitment	Post	Requires justified collection of data plus consent and/or Legitimate Interest	24 months
	Email	Explicit positive consent	24 months
	Live Phone Call	Explicit positive consent	24 months
Communications that are for the purposes of processing direct marketing information (e.g. updating donor information)	Email	Requires justified collection of data plus consent	36 months
	Live Phone Call	Requires justified collection of data plus consent	36 months
	Post	Requires justified collection of data plus consent	36 months