**Raising Health Privacy Policy**

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Raising Health is committed to protecting your privacy. This policy sets out how we will use and protect any information you share when you visit our website.

**What this privacy policy covers**

Whether you are a donor, volunteer or fundraiser, Raising Health is committed to protecting your personal information. This policy explains how Raising Health uses the personal information you provide to us and that we collect, online, via phone, email, in letters or in any other correspondence.

We ensure that we use your information in accordance with all applicable laws concerning data protection of personal information. This policy explains:

* What information Raising Health may collect about you;
* How we will use that information;
* Whether we disclose your details to anyone else;
* Your choices regarding the information you provide to us; and
* How we use cookies to provide services to you or to improve your use of our website. If you have any queries about this privacy and cookies policy please contact Fundraising Manager, Raising Health, Riverside House, Bridge Park Road, Thurmaston, Leicester LE4 8PQ or email lpt.raisinghealth@nhs.net

By using our website or any of our services, or providing us with any personal data, you agree to your personal data being used and disclosed in the manner set out in this policy.

**Who we are**

Raising Health is the registered charity of Leicestershire Partnership NHS Trust (LPT). LPT provides community and mental health care for the people of Leicester, Leicestershire and Rutland and is the Controller.

**Our Mission**

Raising Health to support patients, their carers and the NHS staff who look after them in Leicester, Leicestershire, Rutland.

It does this through targeted fundraising campaigns and effective management of donations, to provide additional resources, assets and skills which link closely with the strategic aims of LPT and the broader strategic aims of NHS healthcare in the East Midlands.

Our registered charity number is 1057361.

**Information collection**

We collect information in the following ways:

* Information you give us. For example, when you engage with our social media or message boards, make a donation to us, register for an event or otherwise provide us with personal information. When you register, we’ll ask for personal information, like your name, email address and telephone number to store with your account.
* Information we get from your use of our website and services. We collect information about the services you use and how you use them, like when you view or interact with our content.

We may also receive information about you from third parties. This can include information such as your name, postal address, email address, phone number, your geographic location (for mobile devices), credit/debit card details and whether you are a tax payer so that we can claim Gift Aid. We, like all companies, are able to confirm what browser you are using, IP address and computer operating systems that are being used and this information may be used to improve the services we offer.

By submitting your details you enable us to raise funds and to provide you with the services, information, activities or online content you select and any other related services Raising Health may provide if you have given us consent to do so.

We do not usually collect ‘sensitive personal data’ about our supporters unless there is a clear reason for doing so, such as participation in a marathon or similar fundraising event or where we need this information to ensure that we provide appropriate facilities or support to enable you to participate in an event.

We may collect health information if you tell us about your experiences relating to a personal health condition; this will enable us to provide you with information about a particular area of the NHS in Leicester that may be of interest to you.

**Website users**

Raising Health’s website uses cookies to help our website work well and to track information about how people are using it. More information on cookies can be found further down the page.

In addition, if you submit your information via our website then the following will also apply:

* Raising Health website collects personal information when you register with us or submit an enquiry form (send us a message).
* The website forms will collect information such as your name, email address and post code.
* As part of the registration process, you agree that any registration information you give to Raising Health will be accurate, correct and up to date.
* We collect and retain information about your donations to us so that we can process your donations and deal with future queries.
* We will use the information to send marketing communications to you if you have opted in to receive this under the General Data Protection Regulation (EU) 2016/679 (GDPR)
* We use cookies to allow us to store limited information on an individual’s computer to track them through tracking cookies. We use this information to provide you with a good experience when browsing our website and to improve the functionality of our site.

**Your debit and credit card information**

If you use your credit or debit card to donate to us, buy something or pay for a registration online or over the phone, we will ensure that this is done securely and in accordance with the Payment Card Industry Data Security Standard. Find out more information about [PCI DSS standards](https://www.pcisecuritystandards.org/pci_security/).

We do not store your credit or debit card details at all, following the completion of your transaction. All card details and validation codes are securely destroyed once the payment or donation has been processed. Only staff authorised and trained to process payments will be able to see your card details.

If we receive an email containing any credit or debit card details, it will be immediately deleted, no payment will be taken and you will be notified about this. All purchases or donations made via credit or debit card should be completed through our [website](http://www.raisinghealth.org.uk) or via our fundraising team by calling 0116 2950889.

**How we may use your information**

We may use your information for a number of purposes including the following:

* To provide you with the services, products or information you have requested or which we feel may interest you where you have consented to being contacted;
* To process donations we may receive from you;
* To fundraise in accordance with our internal policies and procedures;
* To provide you with information about our work or our activities that you have agreed to receive;
* To fulfil sales contracts you have entered into with us;
* For administration purposes (for example we may contact you regarding a donation you have made or the event you have registered for);
* For internal record keeping, including the management of any feedback or complaints;
* To analyse and improve the services offered on our sites to make it as user-friendly as possible;
* We may analyse your personal information to create a profile of your interests and preference so that we can contact you with information relevant to you. We may make use of additional information about you, including geo-demographic information and measures of affluence, when it is available from external sources to help us do this effectively. This helps us understand the background of the people who support us and helps us to make appropriate requests to supporters who may be able and willing to give more than they already do. We may also use your personal information to detect and reduce fraud and credit risk
* Where it is required or authorised by law.

If you enter your contact details into one of our online forms, we may use this information to contact you, even if you don’t click ‘submit’ on the form. We will do this to see if we can help with any problems you might be experiencing with the form or with our website, or to see if you would like to continue the action you were taking on the form.

**Marketing materials**

We may contact you for marketing purposes by email, post or telephone if you have agreed to be contacted in this manner. By subscribing to Raising Health emails or opting in to email communication from Raising Health, you grant us the right to use the email for both email marketing purposes and advertisement targeting. We may also send you service communications via email.

It is your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you are happy for us to use your personal information in these ways please tick the relevant box(es) situated on the form(s) on which we collect your data.

We will conduct all marketing activity in line with General Data Protection Regulation and will only send you marketing materials if you have clearly opted to do so.

You may opt-out of our marketing emails at any time by clicking the “GDPR form” link in at the end of our marketing emails.

You can also change any of your contact preferences at any time (including telling us that you don’t want us to contact you for marketing purposes) by contacting our office on 0116 2950889 or lpt.raisinghealth@nhs.net

Where you have instructed us to remove your information from our list a message will be sent to you to confirm that as from the date of your request your details have been located and erased from all of some of the following (dependent on your request):

·     Harlequin (our customer relationship management database and staff lottery processing database);

·     Local processing spreadsheets that you may appear on (for example event files);

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There are some areas where your details will remain for slightly longer than the date advised:

·      Within Harlequin staff lottery processing software, we cannot delete data from archived files (from previous draws) until the current raffle draw is complete. Therefore your details will be erased after the completion of the latest draw to be completed

·    Under Article 17 (3b) of the GDPR items can be exempt from erasure, where the data is required for compliance with a legal obligation. We are obliged to keep information relating to taxation, including Gift Aid, for the HMRC for 6 financial years from the end of the financial year relating to the transaction date. If you have given us permission to collect Gift Aid on your donation, we must keep any details relating to any of these transactions for this period of time before deleting them.  However, they will then be erased in line with this retention period, and not used for any other purpose.

Finally, your erasure request can be more instantly fulfilled in respect of live systems, but your data will remain within the backup environment until it is overwritten. If we were to restore any data, we are able to choose from which systems this would be restored and would therefore be able to identify whether the back up copy required checking for erasure once restored.

We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

**Information sharing and disclosure**

Raising Health may share your personal information with Leicestershire Partnership NHS Trust (LPT) as they act as the Controller for Raising Health.

Raising Health may share your information with our Processors. This would include our trusted partners that work with us in connection with our charitable purposes, (subject to your communication preferences and our internal policies and procedures). We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all of our Processors and regularly monitor their activities to ensure they are complying with Raising Health and LPT policies and procedures.

Rest assured, we will never share, sell or swap your details with any third parties for the purposes of their own marketing or the monetising of your data.

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies) which will include gift aid claims, or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect Raising Health, for example in cases of suspected fraud or defamation.

**LPT Staff Lottery - STAFF ONLY**

Raising Health runs the staff lottery, raising funds for Staff Benefit within LPT, as well as giving out weekly prizes. As part of the process, we send details to LPT’s Payroll Provider of those staff who have registered to join the LPT Staff Lottery so that they may make deductions directly from your salary. We also send details of cancellations and adjustments. We may also contact the payroll provider on your behalf to raise queries. We receive information from the payroll provider relating to those who have deductions from their salary so that we are able to reconcile our database and ensure that those entered into the weekly draw are paying correctly.

**Under 13s**

We are committed to protecting the privacy of the young people that engage with us. Our fundraising events request specific information about the age of participants. If you are under 13 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When we collect data about a child or young person aged under 13 we will make it very clear as to the reasons for collecting this data and how it will be used in a manner that they will understand.

**Inappropriate website content**

If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws, such as defamatory content on our forums or social media pages, we may use your personal information to inform relevant third parties such as your internet provider or law enforcement agencies.

**Where we may store your information**

For financial and technical reasons we may, on occasion need to use the services of a supplier outside the European Economic Area (EEA), however we will ensure that your information is held in compliance with the European data protection regulations. By submitting your personal information you agree to this transfer, storing or processing at a location outside the EEA. We will take all steps reasonably necessary to ensure that your data is kept secure and in accordance with this privacy policy.

**Keeping your records**

We keep records for as long as required to operate the service in accordance with legal requirements and tax and accounting rules. Where your information is no longer required, we will destroy all paper records and archive all digital data.

**Cookies**

Cookies make the interaction between users and websites faster and easier, and help to improve websites. Without cookies, a web site could not remember a user's preferences.

We also use cookies to gain insights about our sites’ performance, such as page views, conversion rates, device information, visitor IP addresses and referral sites. We also may use third party cookies, such as Google Analytics, to assist with analyzing performance. Any third party cookie usage is governed by the privacy policy of the third party placing the cookie.

None of the cookies used on our website gather personal information about you.

**Cookies which are from trusted third parties**

We utilise the technology of third parties on a regular basis to offer the best and most efficient service possible on our website. This in turn means that there will be a number of third party cookies from our trusted suppliers used on our website. Each company is responsible for the cookies that they place onto your device and have separate policy documents to highlight their use.

Our list of trusted third parties who may deploy a cookie to your device, with a link to their cookie details is below:

|  |  |  |
| --- | --- | --- |
| Third Party | Policy location  | Type of business |
| Stripe | <https://stripe.com/gb/privacy> | Online payments |
| Google Analytics | <https://www.google.com/policies/privacy/>  | Website analytics |
| Facebook | <https://www.facebook.com/legal/FB_Work_Privacy> | Social media |
| Twitter | <https://twitter.com/en/privacy> | Social media |
| Paypal | <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full> | Online payment |
| Just Giving | <https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20>  | Online donation platform |
| Virgin Money Giving | <https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp>  | Online donation platform |

**Tracking**

We use multiple first and third party technologies such as pixel tags and web beacons to track and improve the user experience on our sites, quality of service and to monitor the effectiveness of campaigns and digital marketing activity.

We may use them to:

* see what website content is popular and how people are using the site as they allow us to track users movement through our website. This type of information is amalgamated so that we can build up a picture of how the site is performing.
* make sure we offer you a consistent service. For example, if we are testing new website content or we want to run a survey, we use tracking to remember what content you have seen or if you have already been asked to join the survey.

**Third Party Privacy Statements**

As outlined in this policy we may, on occasion, need to share your data with a third party organisation. These organisations are listed below along with their privacy statement.

|  |  |  |
| --- | --- | --- |
| Third Party | Policy location  | Type of business |
| DBS Data | <https://dbsdata.co.uk/privacy-policy/> | Data check |
| Adept  | <http://www.adeptdesign.co.uk/about/privacy-policy>  | Website host |
| Stripe | <https://stripe.com/gb/privacy> | Online payments |
| Google Analytics | <https://www.google.com/policies/privacy/>  | Website analytics |
| Facebook | <https://www.facebook.com/legal/FB_Work_Privacy> | Social media |
| Twitter | <https://twitter.com/en/privacy> | Social media |
| Harlequin | <http://www.harlequinsoftware.co.uk/privacy/>  | CRM database |
| Paypal | <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full> | Online payment |
| Just Giving | <https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20>  | Online donation platform |
| Virgin Money Giving | <https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp>  | Online donation platform |

**Your ability to edit and delete your account information and preferences**

The accuracy of your information is important to us. If you would like to change your preferences or update the details we hold about you other than online, please contact our Fundraising Team on

0116 2950889 or by email to lpt.raisinghealth@nhs.net or write to Fundraising Manager, Raising Health, Riverside House, Bridge Park Road, Thurmaston, Leicester LE4 8PQ.

Under Data Protection law (General Data Protection Regulation (EU) 2016/679; Data Protection Act 2018) you have a right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We require you to prove your identity with two pieces of approved identification. Please address requests to the Fundraising Manager, Raising Health, Riverside House, Bridge Park Road, Thurmaston, Leicester LE4 8PQ.and we will respond within 28 days, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records.

**Changes to this privacy policy**

We may update the terms of this policy at any time, so please do check it from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our website. By continuing to use our website you will be deemed to have accepted such changes.

**Complaints, compliments or comments**

If you are unhappy with our work or something that we have done or failed to do, we want to know about it. We also welcome your views on what we do well. Your comments enable us as an organisation to learn and continuously improve our services. Please address any correspondence to the Fundraising Manager, Raising Health, Riverside House, Bridge Park Road,Thurmaston, Leicester LE4 8PQ or email lpt.raisinghealth@nhs.net