

**Privacy Policy (Draft)**

This privacy policy applies to information we, Plymouth & Cornwall Cancer Fund collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us on honsec@pccf.org.uk

**1. Personal data that we process**

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed

|  |  |  |
| --- | --- | --- |
| **Purpose** | **Data (key elements)** | **Basis** |
| Enquiring about our organisation and its work | Name, address, email, letter, message | Legitimate interests – it is necessary for us to read and store your message so that we can respond in the way you would expect |
| Grant Applications | Name, address, email, letter, message | Contract - it is necessary for us to read and store your application so that we can respond in the way you would expect |
| Making a donation | Name, address, email, letter, payment information | Legitimate interests – this information is necessary for us to fulfill your intention of donating money and your expectation of receiving a confirmation message |
| Website functionality | No cookie features on our site |  |
| Fundraising – including Just Giving, Social Media | Supporter contact details (Direct Mail – opt out option)  Just Giving share with PCCF, details about donations made to them, including your personal data, unless you choose to donate anonymously  Social Media – Name, photograph | Consent – you have given your active consent |

Just Giving privacy policy is available - <https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20>

Facebook Privacy Policy is available -

<https://www.facebook.com/policy.php>

**2. How we use your data**

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table above.

For example, we may use your personal information to:

* reply to enquiries you send to us
* handle donations or transactions you initiate
* process your grant application

**3. When we share you data**

We will only pass on your data to third parties in the following circumstances:

* You have provided your explicit consent for us to pass data to a named third party
* We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or we are required by law to share your data

In addition, we will only pass on data to third parties outside the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

**4. How long we keep your data**

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete data promptly once it is no longer required.

Where data is collected on the basis of consent, we will review consent at least every three years.

**5. Rights you have over your data**

You have a range of rights over your data, which include the following:

* Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this
* You have the right to ask for rectification and/or deletion of your information
* You have the right of access to your information
* You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed

A full summary of your legal rights over your data can be found on the Information Commissioner’s website - <http://ico.org.uk>

**6. Cookies and usage tracking**

There are currently no cookie features on our website.

However, our website does have a plugin to Google Analytics who anonymously track visitors to this site. This information collected by Google Analytics about usage of our website is not personally identifiable. Google’s privacy policy is available at <http://www.google.com/privacypolicy.html>

**7. Modifications**

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we’ll notify people whse personal data we hold is affected.

**Approval Date: 26th June 2018 (Committee Meeting Minute No 1439)**

**Review Date: June 2021**