FUNDRAISING AND COMMUNICATIONS PRIVACY POLICY

COMBAT STRESS
FOR VETERANS' MENTAL HEALTH

We are committed to safeguarding your privacy and to this end have developed the following Privacy Policy to deal with issues which may concern you. Please read the Privacy Policy to understand how your personal information will be treated. This policy may change from time to time so please check it periodically. It was last updated on 17/05/2019.

This Policy sets out how Combat Stress promises to respect all personal data that you share with us, or that we get from other sources. We intend to keep this data safe and we will not do anything you would not reasonably expect.

This policy applies to all information collected, both offline and online, the websites we operate and our use of post, emails, telephone calls and text messages for marketing purposes. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.

Who are 'we'?

In this policy, whenever you see the words 'we', 'us' or 'our', it refers to Combat Stress and Combat Stress Trading Ltd.

The full legal information for each entity is:

- Combat Stress, a charity registered in England and Wales (206002), and Scotland (SC038828)
- Combat Stress Trading Limited is a company registered in England &Wales. Registration number 256353

Combat Stress and Combat Stress Trading Ltd are separate companies, each registered as a data controller in their own right.

Combat Stress Trading sells a range of goods and enters into corporate partnership arrangements; all of its profits are passed to Combat Stress.

Both of these companies are wholly owned and controlled by Combat Stress. Many of the staff who work for these two companies – including all the company directors – are Combat Stress employees, and the companies share many of the Combat Stress 'head office' functions such as marketing, legal and HR.

Combat Stress is a member of the Fundraising Regulator (www.fundraisingregulator.org.uk) and the Institute of Fundraising (www.institute-of-fundraising.org.uk).

Your acceptance of this policy, and our right to change it

By providing your information to us or by using our websites or social media pages, you consent to our collection and use of the information you provide in the ways set out in this policy. If you do not agree to this policy please do not use our sites, social media pages or provide your details to us.

If we make any significant changes in the way we treat your personal information we will make this clear on the Combat Stress website or by contacting you directly.

What information do we collect?

We will only ever collect the information we need and only share it with those that need to know – including data that will be useful to help improve our provisions and communications with you. We collect:

- **Non-personal** information such as IP addresses (the location of the computer on the internet), pages accessed and files downloaded. This helps us to determine how many people use our sites, how many people visit on a regular basis, and how popular our pages are. This information doesn't tell us anything about who you are or where you live. It simply allows us to monitor and improve our online service to you.
- **Personal** information such as name, postal address, phone number, email address, date of birth and bank details (where appropriate), information about your interests etc. You don't have to disclose any of this information to browse the online sites. If you donate by direct debit we will store your bank details. We DO NOT store your credit card details. However, some third-party providers may store your card details on their sites. All providers we use are fully compliant with PCI rulings.
- We also use **cookies** on our websites. Please see our cookies policy (below) for further information.

You have the right to withhold requested information, however we may not be able to provide you with certain services if you do this.

Children's data

It is our policy not to request donations or subscriptions, or accept product orders, from children under 18. If we are contacted by anyone under 18, before we collect data from them we will always ask them to:

- Obtain the permission of a parent or guardian before contacting us, and
- Let an adult know before they use our sites to obtain information about fundraising or supporting our work.

Other people's data

Some of the services we offer allow you to provide the personal data of other people (e.g. providing a friend's name for event tickets you have purchased or tagging people on photos on social media). Before providing anyone else's data please ensure they are happy for you to do so and under no circumstances must you make public another person's home address, email address, or phone number without their permission.

Where we collect information about you from

We collect information in the following ways:

When you give it to us DIRECTLY
You may give us your information when you give a donation, purchase our products, register for an event or communicate with us. Sometimes when you support us, your information is collected by an organisation working for us (e.g. fundraising/marketing agencies), but we are responsible for your data at all times.

When you give it to us INDIRECTLY
Your information may be shared with us by independent fundraising websites like Just Giving or Virgin Money Giving. These independent third parties will only do so when you have indicated that you wish to support Combat Stress and with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

When you give permission to OTHER ORGANISATIONS to share or it is available publicly
We may combine information you provide to us with information available from external sources. This will enable us to gain a better understanding of our supporters, improving our fundraising methods, products and services, and will help us to build a stronger relationship with you.

The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

- **Third party organisations**
  You may have provided permission for a company or other organisation to share your data with third parties, including charities. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.
- **Social Media**
  Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.
- **Information available publicly**
  This may include information found in places such as the Electoral Register, National Change of Address, Google, Companies House and information that has been published in articles/ newspapers. This allows us to assess and improve the accuracy of the information we hold about you and to better manage our relationship with you.
- **Links to third party websites**
  Our website contains links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our website and we are not responsible for the privacy policies that govern third party websites, including social media websites, even where we have provided links to them. If you use any link on our website, we recommend you read the privacy policy of that website before sharing any personal or financial data and make use of the privacy settings and reporting mechanisms to control how your data is used.

What do we do with the information we collect?

We will use the information you provide to:

- Verify your identity, and to detect and prevent fraud.
- Provide you with the services, products or information you have requested.

- Administer your donation, event registration or support your fundraising, including claiming Gift Aid from HMRC.
- Process orders, deliver products and communicate with you about orders.
- Keep a record of your relationship with us.
- Ensure we know how you prefer to be contacted and where you have agreed to it, provide you with information that we think may be of interest to you including fundraising request.
- Carry out research on the demographics, interests and behaviour of our supporters and website users to help us gain a better understanding of them and to enable us to improve our service and communications.
- Provide a personalised service to you when you visit our website – this could include customising the content and/or layout of our pages for individual users.
- Manage surveys and questionnaires.
- We use your personal information to investigate, and respond to complaints, legal claims or other issues.

We may use your personal information for other purposes which we specifically notify you about and, where appropriate, obtain your consent e.g. sharing your story.

Using your information for marketing

We only want to communicate with you by the method you prefer and send you information that may be of interest to you. Our marketing communications include information about our latest news, campaigns and lifesaving work.

With your consent, we will contact you to let you know about the progress we are making and to ask for donations or other support. Occasionally, we may include information from partner organisations or organisations who support us. We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing communications. If you don't want to hear from us, we will respect your wishes.

If you text to donate or text a specific code to be sent some information we may call you back to deal your request. During this call we will ask you if you would like to hear from us in the future.

You can change your preferences at any time by completing our consent form at **combatstress.org.uk/preferences**. Alternatively, if you would like to discuss the communications you are receiving please call Supporter Care weekdays between 8.30am and 4.30pm on **01372 578151** or **email fundraising@combatstress.org.uk**. Please allow 28 days for us to fully complete your request

If we contact you by email, every message we send will include a link to opt out of receiving future messages if you change your mind.

If you would like further information on how to record your communication preferences on the official register then please visit The Mailing Preference Service (mpsonline.org.uk), The Telephone Preference Service (tpsonline.org.uk) and the Fundraising Preference Service (fundraisingregulator.org.uk/the-fundraising-preference-service).

We will never sell your personal data or share it with third parties for their marketing purposes.

Building profiles of supporters and targeting communications

Developing a better understanding of our opted-in supporters through their personal data allows us to

fundraise more efficiently and make better decisions; ultimately, helping us to reach our goal of making sure veterans can tackle the past and take on the future.

We use profiling and screening techniques, including some automated techniques, such as postcode

segmentation, to ensure communications are relevant and timely, and to provide an improved experience for our supporters. Profiling also allows us to concentrate our resources effectively, which donors regularly tell us is a key priority for them. We do this because it allows us to 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. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.

When building a supporter profile, we may analyse the following: the history of your support to us, geographic, demographic and other information relating to you, in order to better understand your interests and preferences and contact you with the most relevant communications. In doing this, we may use additional information from third party sources when available. Such information is compiled using publicly available data.

Sharing your information

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency, legitimately exercising a power, or if compelled by an order of the Court.
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or website.
- We are working with a carefully-selected partner that is carrying out work on our behalf. These partners may include mailing houses, marketing agencies, IT specialists and research agencies. The kind of work we may ask them to do includes processing, packaging, mailing and delivering purchases, answering questions about products or services, sending postal mail, emails and text messages, making fundraising or administration calls, carrying out research or analysis and processing card payments. We only choose partners we can trust. We will only pass personal data to them if they have signed a contract that requires them to:
    - abide by the requirements of the Data Protection Act
    - treat your information as carefully as we would
    - only use the information for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation)
    - allow us to carry out checks to ensure they are doing all these things

Storing your information

Information is stored by us on computers located in the UK. We may transfer the information to other offices and to other reputable third party organisations as explained above – they may be situated inside or outside the European Economic Area. We may also store information in paper files.

We place great importance on the security of all personally identifiable information associated with our supporters, customers and users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are authorised to access user information and we use secure server software (SSL) to encrypt financial and personal information you input before it is sent to us. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

We will keep your information only for as long as we need it to provide you with the goods, services or information you have required, to administer your relationship with us, to inform our research into the preferences of our supporters, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need information we will always dispose of it securely, using specialist companies if necessary to do this work for us.

Your rights

The Data Protection Act 2018 gives you certain rights over your data and how we use it. These include:

- The right of access to a copy of the information we hold about you (known as a subject access request), and the right to have your data corrected or updated.
- The right to prevent your data being used for direct marketing.
- The right to ask us to stop processing and erase all data relating to you. If there is no other legal ground for the processing (e.g. administration of your donation or registering you for an event) we will do so.
- The right to lodge a complaint. Please write to: Robert Marsh, Director Income Generation, Combat Stress, Tyrwhitt House, Oaklawn Road, Leatherhead, Surrey KT22 0BX or email **robert.marsh@combatstress.org.uk**. We will respond within five days.

If you wish to exercise any of these rights please contact the Chief Information Officer, Combat Stress, Tyrwhitt House, Oaklawn Road, Leatherhead, Surrey KT22 0BX. We do not charge for reasonable or proportionate requests. Please include your full name and address and any details to help us identify and locate your information.

For more information about your rights under the Data Protection Act go to the website of the Information Commissioner's Office at ico.org.uk.

Combat Stress is not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act; using the funds generously donated to us by our supporters for such activities is not in accordance with our charitable purposes.

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