

1. Purpose

This policy commits Sophie Hayes Foundation to integrity and transparency at every level of the organisation; this includes the ways that we collect, handle, and maintain our data records. The purpose of this policy is to lay out how our values translate into how we handle personal data and to demonstrate how our information handling adheres to legislative and statutory requirements.

This policy outlines:

- The scope and application of this policy
- What information we collect
- How we use and store personal data
- Information about your right
- Cookies and Privacy

2. Scope

This Policy applies to all data and information collected and held regarding individuals and businesses external to the organisation, and includes donors, supporters, stakeholders and interested parties.

All data collected and held about individuals internal to the organisation including staff, trustees, volunteers, and service users, is dealt with in the Internal GDPR Policy.

This policy applies to information held in any format, both print and electronic, and extends to portable storage (USB/memory sticks, CD's etc) email, recordings, and photographs.

This policy draws on established good practice and guidance and recommendations contained on the Information Commissioner's section for organisations [For organisations | ICO](#), the Data Protection Act 2018 and the UK General Data Protection Regulations (GDPR) 2021.

3. The Policy

3.1. The information we collect

We collect data from you when you interact with the Sophie Hayes Foundation, in-person, by post, over the phone or by SMS. Some of this information is personal data which can be used to identify you. Personal data can include your name, address, date of birth, telephone number, email address and sometimes bank details if you are donating.

We will only collect data which is relevant to the purpose for which you have given it.

Examples of when we collect information are when you do things such as:

- Sign up for our newsletter
- Sign up to hear about volunteering opportunities
- Request information from us
- Request training
- Fundraise for us
- Donate to us
- Sign up to a campaign

	Position	Name	Date
Originator	Head of Operation	Carly Webster	1 st July 2024
Reviewer	CEO	Emily Death	10 th July 2024
Approval	CEO	Emily Death	10 th July 2024

3.2. Why we collect personal data

We collect personal data to ensure you (our donors, supporters and interested parties) receive up to date information you have requested from us.

We also may use your personal data to keep you informed about our work based on what you have indicated you would like to receive, such as the newsletter, or information about volunteering opportunities.

If you have donated to us, we use your information to process any donations you have given, and any Gift Aid associated with that donation.

3.3. How might we contact you?

We may contact you via post, email, telephone, or SMS text. However, we will only contact you through the channel you have told us you wish to receive our communication, and where we have received your consent to do so.

When we contact you directly about the Sophie Hayes Foundation, including fundraising campaigns, regular correspondence such as newsletters, volunteering opportunities or upcoming events, this is a type of Direct Marketing. We contact you about these things when you have given us your consent to do so.

Some supporters may not have expressed their communication preferences to us. In those cases, we will conduct a balancing exercise to determine whether we have a legitimate interest in contacting you. This balancing exercise will include recent contact and donation or fundraising activity, and whether you would reasonably expect to receive information from us. Unless you have opted into emails to receive communications that can be categorised as direct marketing, which includes our newsletters and fundraising related emails, we will not send you these at all but may provide you with the opportunity to opt in by email if this was not provided at the point of involvement with the charity.

If you are a new supporter, we will aim to capture your consent for Direct marketing purposes at the data collection point. You do not have to give consent – it is your decision. If you do consent, we will also ask your preferences for how you would like to be contacted, by phone, text, email or by post. As a default position we will consider consent to remain valid while you are regularly donating to us or receiving our regular communications and have not objected to doing so.

You can give or withdraw consent to Direct Marketing or change your contact preferences at any time by emailing us at info@sophiehayesfoundation.org or writing to us at 154-160 Fleet Street. London. EC4A 2DQ. You can also unsubscribe through the link at the bottom of our emails to you.

3.4. Storing and sharing personal data

Sophie Hayes Foundation is committed to ensuring that there are appropriate technical controls in place to protect your personal details, for example, our online forms are always encrypted (this prevents other people accessing them) and our website is maintained internally by the Sophie Hayes Foundation communications team.

We regularly review who has access to information that we hold to ensure it is only accessible by trained staff and, where appropriate, volunteers.

Your data will not be processed outside of Sophie Hayes Foundation and will not be disclosed to any parties outside of the Sophie Hayes Foundation, except for trusted parties and affiliates with whom we work, for example, sending e-newsletters or processing donations and Gift Aid, e.g., our bank, database and HMRC.

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We only enter relationships with third parties who have appropriate data protection policies and procedures in place. All data held by third parties is deleted when it is no longer needed. We will always clearly indicate instances when your personal information will be shared with a third party.

3.5. Third parties we use are:

- Blackbaud's Etapestry system, for the newsletter
- Payment processing platforms including Just Giving and Go Cardless

We regularly review the information that we hold and remove data that is no longer required. As part of our responsibilities to ensure that data we hold is accurate and up to date, and you can contact us to update any information we hold about you by either:

- emailing info@sophiehayesfoundation.org
- writing to us at 154-160 Fleet Street. London. EC4A 2DQ.

We will not disclose your data to any other third parties unless we have your explicit consent to do so. At no time will your data be passed to a third party for marketing purposes. Your personal data will be held on our database during the period of our active relationship. Once we no longer require your data it will remain on our database indefinitely but will be marked inactive and no further steps will be taken to process it. We will not keep your personal data for any longer than it is necessary. Once it is no longer required, we will take all reasonable steps to destroy it or erase it from our systems.

3.6. Your rights

In relation to us processing your personal data you have the following rights, which can be exercised at any time:

- To withdraw your consent for us to process your data
- To be forgotten – to request your data is no longer processed or stored by us
- Subject Access Requests – a right to request a copy of the data we hold about you within timeframes outlined by the ICO. Guidance is available here [Make a subject access request | ICO](#)
- To object to your data being used by us for the purpose of Direct Marketing.

If at any time you have concerns about the way your data has been processed by the Sophie Hayes Foundation, and these concerns cannot be resolved by the Sophie Hayes Foundation have the right to take those concerns externally and raise them with the regulator, the Information Commissioner, www.ico.org.uk

3.7. Questions and contact details

Copies of our Data Protection Policy are available upon request.

Contact us via email: info@sophiehayesfoundation.org

Contact us by post, 154-160 Fleet Street. London. EC4A 2DQ.

If at any time you have concerns about the way your data has been processed by the Sophie Hayes Foundation, and these concerns cannot be resolved by the Sophie Hayes Foundation, you have the right to take those concerns externally and raise them with the regulator, the Information Commissioner, [Make a complaint | ICO](#)

3.8. Cookie policy

Any information that we collect through the use cookies is completely anonymous and not personally identifiable. Our systems will not store your name, address, telephone number, or email address unless

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volunteered to us by you. This shall be treated as proprietary and confidential; we do not sell or share your details with any third parties. Additionally, none of the cookies we use gather any information that can be used to advertise services or products to you from our or any other website.

3.9. The Law

The EU Cookie Law (The Privacy and Electronic Communications Regulations 2011 and subsequent amendments 2015, 2016, 2018 and 2019) is a piece of privacy legislation that requires visitors to give consent before allowing a website to store or retrieve any information from any device using cookies. By educating visitors on how information about them is collected using cookies and allowing them to decide for themselves if they wish to allow it to take place, the aim is to protect online privacy for everyone.

3.9. What Are Cookies?

Cookies are small text files, downloaded to your computer by the browser (e.g., Internet Explorer, Firefox etc.) whenever you access a website. They enable websites to store such information as user preferences and login details. They may also be used to record how long you spend browsing each page on a site or what pages you visit most. Cookies can be thought of as providing a “memory” for the website, enabling it to recognise you and respond appropriately. Generally, cookies are most beneficial to you, the visitor, making your interaction with frequently visited sites smoother and easier than they would be without them.

3.10. How Our Website Uses Cookies

Website Statistics

We use Google Analytics and WIX, our website host, third-party services which create their own set of cookies for the purpose of compiling several statistical reports. The information gathered is completely anonymous and is used to assess a wide variety of website activities, including how our site is navigated and what pages are most popular. If you would prefer that Google did not track about your browsing habits, you can install a browser add-on to opt-out.

Finding our Offices

We use Google Maps on our Contact Us page to provide detailed information on how best to visit our offices. Google set a cookie that allows them to remember which browser you are using and what preferences you have set when you view maps. We use Google Maps tools on the basis that Google adheres to its privacy policy and its terms of service.

Social Media

We may also use several third party, social media plug-ins including but not limited to Google’s ‘+1’ button, Facebook’s ‘Like Box’, Twitter’s ‘Follow Button’, LinkedIn’s ‘Share’ and ‘Follow’ and Instagrams ‘Follow’ buttons. We use these services for the convenience of our visitors, allowing them to access up to the minute information as well as recommend our services to others. To learn more about each organisations’ privacy policies, please visit their websites.

How to Disable Cookies?

By continuing to browse this site you are agreeing to our use of cookies as described above. However, you can still disable cookies at a browser level if you wish. You may experience reduced functionality if you choose to do so. The settings that decide how your browser handles cookies will typically be found in the ‘Options’ or ‘Preferences’ menu of your browser. In order to understand these settings, you should use the ‘Help’ option in your browser for more details.

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4. Reference and related documents

Code of Conduct
Data Protection Policy
Fundraising Policy

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