

# **Privacy & Data Protection Policies**

Cancer Support Scotland is committed to protecting your personal data. This Privacy & Data Protection policy states how we collect data, how we store it and how we use it. Cancer Support Scotland ("we," "our," "us") are the data controller for the purposes of the Data Protection Act 1998 ("DPA") and the General Data Protection Regulation ("GDPR") (law as of 25 May 2018) in respect of the personal information which we hold about you. You can update your information at any time by visiting www.cancersupportscotland.org/home-3/keeping-in-touch-dont-get-ticked-off/

The purpose of this policy is to give you a clear explanation about how Cancer Support Scotland collects and uses the personal information you provide to us and that we collect. We ensure that we use your information in accordance with all applicable laws concerning the protection of your personal information.

If you have any queries about this policy or your personal information please contact our CEO: Cancer Support Scotland
75 Shelley Road
Gartnavel Campus

Email: info@cancersupportscotland.org

Call: 0141 337 8199

Glasgow G12 0ZE.

Cancer Support Scotland is registered under the Data Protection Act 1998 Registration No. Z268688X and any data collected will be used and held in accordance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation 2018.

### **Privacy Policy**

## This Policy explains:

How we collect information.
What we do with the information.
What information we collect.
How we use the information.

## How do we collect information?

We obtain personal information from you when you enquire about our activities, register with us, send or receive an email, donate to us, ask a question about or use our services or otherwise provide us with your personal information. We may obtain your personal information from third party data suppliers only if they provide the appropriate evidence that you have agreed for your personal information to be shared with Cancer Support Scotland.

We also gather general information about the use of our websites such as pages visited and areas that are of most interest to users. We use this information to improve our website and make it a better experience for everyone. For further information please see the cookies section below.

Occasionally we obtain publicly available information such as contact information or we research information to help us perform due diligence checks to ensure we are not being abused by fraudsters or criminals posing as genuine donors or to ensure that there are no conflicts of interest from potential supporters or organisations prior to our engagement. We do these checks to help protect Cancer Support

Scotland from abuse. For further information around this please see the marketing section below and our Fundraising Policy is available on request.

### What information do we collect?

The personal information we collect might include name, address, email address, telephone numbers, date of birth, general health information or bank account details (for setting up regular direct debit or payment information). When you are using one or more of our services we may collect relevant medical information. See Fundraising and Service Information.

Data protection law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal information and covers health information, racial or ethnic origin, religious beliefs or other beliefs of a similar nature, sexual orientation, political opinion and trade union membership. We would only collect sensitive personal information where there is a clear need to do so such as participation in a challenge event, to ascertain what services are relevant to you or to cater other services and support to you. Before collecting any sensitive personal information about you we will make it clear to you what information we are collecting and the purposes for collecting the information.

# How do we use your information?

Using your credit or debit card to donate or purchase through our Cancer Support Scotland shop 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 this is done securely and in accordance with the Payment Card Industry Data Security Standard. You can find out more information about PCI DSS here: 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 are securely destroyed once the payment or donation has been processed. Only staff authorised and trained to process payments will able to see your card details.

### **Data Protection**

### This policy explains:

How we protect your information Services Fundraising Marketing It's your decision Personalisation and Profiling Keeping your personal information safe Your rights Website and IT Changes

### How do we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal or transactional data stored on our website and systems.

### **Services**

We collect details such as your name, address, telephone number, date of birth, email address to enable us to contact you regarding your appointments, details of new services, and to help us tailor our services to meet your needs. We also collect health information to ensure that that the service we provide is safe. We cannot provide our service without this information. We use the information you provide us to apply for grants and to demonstrate the effectiveness and benefits of our services. All identifiable information is omitted from the statistics and your personal details are never disclosed to any of our supporters without your written consent.

## **Fundraising**

Being able to communicate with you is important, as your support is critical in allowing Cancer Support Scotland to continue to support patients, family and carers and allowing Cancer Support Scotland to continue to offer their services free of charge.

We believe in being open, honest and transparent with our supporters and want you to feel comfortable about your decision to give us your personal information and how we may use it. We will use the details you provide to us to communicate to you how your support is helping and additional ways you can help in the future - whether that's through volunteering, events or fundraising.

From time to time we may also send you appeals requesting a donation to support Cancer Support Scotland's mission. We promise that we will only communicate with you in the way you wish us to and we will always respect your privacy. You can change your mind at any time and it is quick and easy to let us know that you no longer want to hear from us either by calling Cancer Support Scotland on 0141 337 8199 or emailing us at <a href="mailto:info@cancersupportscotland.org">info@cancersupportscotland.org</a>. We will always respond to your wishes in a sensitive, timely, courteous and professional manner.

Please be assured that we will take appropriate measures to keep your personal information safe and secure and we promise not to over-contact. We will never sell your information on to any other organisation or share it with another organisation for them to use for their own marketing purposes.

We collect and use your personal information by relying on the legitimate interest basis. This is because when you, for example, request to receive services, make a donation, or volunteer with us, we have a legitimate organisational interest to use your personal information to respond to you and there is no overriding prejudice to you by using your personal information for this purpose. We will always provide you with the option to opt-out of hearing from us. In most instances, however, we will rely on obtaining your consent to our use of your personal information. This is the case, for example, where we seek to obtain your consent to receive email marketing from Cancer Support Scotland.

## Marketing

We will only communicate with you once you have authorised us to do so. For example:

### **Email**

If you actively provide your consent to us along with your email address and/or mobile phone number we may contact you for marketing purposes by email or text message. By subscribing to Cancer Support Scotland's emails or opting in to email communication from Cancer Support Scotland you grant us the right to use your email address for email marketing.

### Post/Telephone

If you have provided us with your postal address or telephone number we may send you direct mail or telephone you about our work, unless you have told us that you would prefer not to receive such information.

### It's vour decision

It is always your decision as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you do not want us to use your personal information in these ways please indicate your preferences on the form from which we collect your data.

You may opt-out of our marketing communications at any time by clicking the 'unsubscribe' link 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 calling Cancer Support Scotland on 0141 337 8199 or email us at info@cancersupportscotland.org

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

# **Personalisation and Profiling**

We carry out targeted fundraising activity to ensure that we are contacting you with the most appropriate communication, which is relevant and timely and will ultimately provide an improved experience for you. For example, by providing timely news about our work, letting you know the different ways you can support us and how you can help raise funds.

To do this, we may also use basic profiling techniques using information about you, which you have volunteered or we have found online. This will help us tailor our communication so you hear about the areas of our work that are of most interest to you - i.e. volunteering, events, or services, and how your support is helping support cancer patients, family members and carers.

We may also use your personal information that we have gathered in the course of our relationship to understand the likelihood of you responding to a marketing communication from us, potentially donating and in some instances donating or supporting us at a higher level. Because we have a greater understanding of you, this means our communication will hopefully be relevant and of interest to you and in turn it will help us reduce our costs for communication by only communicating with supporters that want to hear from us.

You can stop receiving marketing communications from us, because they have become more generic, less relevant to you, or you are no longer interested in our cause. If you do wish to opt-out please contact Cancer Support Scotland on 0141 337 8199 or email us at: <a href="mailto:info@cancersupportscotland.org">info@cancersupportscotland.org</a>

### **Disclosures**

We will never sell or pass your personal information on to other organisations for them to use for their own marketing purposes.

However, we may disclose your personal information in the following circumstances:

- 1. To third parties who provide a service to us and are data processors. This would include our trusted organisations that work with us relating to our charitable purposes. When this occurs, we have a data protection compliant contract in place with these third parties. Examples include
  - Get Timely (our services booking system which holds your contact information regarding your service appointments)
  - HMRC (to recoup Gift Aid)
  - Mailchip (our newsletter generator)
  - E-Tapestry (our fundraising database and stores your personal giving information).
  - Beatson Psychology Department

We require these third parties to comply strictly with the data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all our data processors and monitor their activities to ensure they are complying with the processes defined by the Data Protection Laws.

- 2. Where we are under a duty to disclose your personal information in order to comply with law or the disclosure is 'necessary' for purposes of national security, taxation, suicide prevention, child protection issues and criminal investigation or we have your written consent.
- 3. Where we need to perform due diligence checks to ensure we are not being abused by fraudsters or criminals posing as genuine donors for example money laundering proceeds of crime tax avoidance. We do these checks to help protect Cancer Support Scotland from abuse.

# Keeping your personal information Safe

We keep your personal service information for 2 years after your last appointment. All other information will be kept for as long as required to operate in accordance with legal requirements and tax and accounting rules. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

# Your rights

Under the Data Protection Act 1998 and the General Data Protection Regulation, which comes into force on May 25th 2018 you have the following rights:

- The right to access your personal information
- The right to edit and update your personal information
- The right to request to have your personal information deleted
- The right to restrict processing of your personal information
- The right to object
- The right to lodge a complaint with a supervisory authority

## 1. The right to access your personal information

You have a right to obtain confirmation that your personal information is being processed. You also have the right to request a copy of your personal information we hold.

You have the right to obtain details of the personal information we hold about you by making a subject access request in accordance with the DPA or the GDPR. Please ensure you provided us with all the requested information in a format to help us locate your records, all requests must be put in writing. After 25 May 2018, we may only charge a reasonable fee where the request is manifestly unfounded or excessive. You can make a request to: <a href="mailto:info@cancersupportscotland.org">info@cancersupportscotland.org</a>

Should you wish to exercise these rights we require you to prove your identity with two pieces of approved identification. Please address requests to:

Cancer Support Scotland 75 Shelley Road Gartnavel Campus Glasgow G12 0ZE

# 2. The right to edit and update your personal information

The accuracy of your personal information is important to us. You can edit your personal information including your address and contact details at any time.

## 3 The right to request to have your personal information deleted

You have the right to request the deletion of your personal information which we will review on a case by case basis.

## 4. The right to restrict processing of your personal information

You have the right to 'block' or suppress processing of your personal data. However, we will continue to store your data but not further process it. We do this by retaining just enough of your personal information so we can ensure that the restriction is respected in the future.

Should you wish to exercise your right to edit, update, delete or restrict the processing of your data please address requests to:

Cancer Support Scotland 75 Shelley Road Gartnavel Campus Glasgow G12 0ZE

Or email info@cancersupportscotland.org

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 28 days before they take effect

## 5. The right to object

You have the right to object to your personal information being processed to marketing (including profiling) and for research purposes. From the very first communication from us and every marketing communication we send after you will have the right to object to marketing.

Alternatively, you can exercise this right by contacting Cancer Support Scotland. Please address requests to:

Cancer Support Scotland
75 Shelley Road
Gartnavel Campus
Glasgow G12 0ZE
Or email info@cancersupportscotland.org

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 28 days before they take effect.

If we process your personal information for the exercise or defence of legal claims or we can demonstrate compelling grounds that override your rights and freedoms we may not be able to fulfil your request. However, we will contact you to discuss this further.

## 6. Your right to lodge a complaint with a supervisory authority

If you are unhappy with how we handle your personal information and you wish to lodge a complaint or seek advice from the Information Commissioner's Office (ICO) you can do so by calling their helpline.

Tel: +44 (0) 01625 545 745 Website: <u>www.ico.org.uk</u>

# Other websites - Linking policy

We encourage linking to our site from other websites, although we do not accept any responsibility for the accuracy or quality of the information external to the Cancer Support Scotland website. In terms of reciprocal linking by Cancer Support Scotland to other websites, we only link to recognised registered charities or relevant partners we feel may be useful to you. We do not endorse any commercial organisations.

Users are encouraged to view, print and download the contents of our website for personal use, however the material on our website or any part of it is not to be incorporated or distributed in any work or in any publication in any form, nor used for any commercial purposes.

### **Internet-based transfers**

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy which may differ from ours.

### Use of cookies

A cookie is a small piece of information sent by a webserver to a web browser which enables the server to collect information from the browser. Find out more about cookies on <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

Most browsers will allow you to turn off cookies. If you want to know how to do this please look at the menu on your browser, or look at the instruction on <a href="www.allaboutcookies.org">www.allaboutcookies.org</a>. Please note however, that turning off cookies could restrict your use of our website.

Some of these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. The information we get through the use of these cookies is anonymous and we make no attempt to identify you or influence your experience of the site while you are visiting it. If you do not allow these cookies we will not be able to include your anonymous visit in our statistics.

### **Text to Donate**

We offer text to donate which is a quick and easy way to donate to Cancer Support Scotland. We use Vodaphone Giving as our provider. For further information please see <a href="https://www.vodafone.co.uk/about-us/just-text-giving/">www.vodafone.co.uk/about-us/just-text-giving/</a>

## Logo Usage

To use our logo for your own purposes you must first gain permission from a member of the Cancer Support Scotland Team (this cannot be just a phone/face-to-face conversation and must be accompanied by a letter/email).

The full logo must always be used along with our Charity Registration number SC012867.

If our logo is used for purposes not discussed or agreed to we have the right to request that you remove it from your materials.

Please call the Fundraising Team on 0141 337 8199 to discuss.

## **Photography**

All photos used within this website have the permission of the subject. Some pictures used may be posed by models.

## **Charity Registration**

Cancer Support Scotland is a registered charity in Scotland (SC012867). Registered company (153568) Registered Office of Cancer Support Scotland, 75 Shelley Road, Glasgow G12 0ZE

### **Disclaimer**

Cancer Support Scotland makes every effort to ensure that the content of the site is accurate and up to date, but we accept no liability in relation to typographical errors or third-party information. Using Cancer Support Scotland services should not be a substitution for professional medical care. If you have any concerns about your health or the treatment you are receiving you should discuss these with your doctor.

Other relating documents -

- 1. Providing and personalising our services (Providing Good Standards of Practice and Care Policy)
- 2. Booking appointments for our services (see Acceptance of Service policy)
- 3. Dealing with your enquiries, requests and complaints (see Complaints Procedure Policy)
- 4. Processing your donations made online or directly with us (see Our Donor Promise policy)
- 5. Providing you with information about our work services and volunteering opportunities (See Acceptance of Services Policy & Volunteering Policy)
- 6. Complying with legal obligations and our policies and procedures
- 7. Administering membership records (see Membership Form)
- 8. Fundraising (see Fundraising policy)
- 9. Conducting market research (new Market Research Policy needed)

To see a copy of any of these policies please contact – Info@Cancer Support Scotland.org Changes to the Data Protection Policy

We may update this policy from time to time. If there are any significant changes in the way we treat your personal information we will contact you and we will place a prominent notice on our website. When we do, we will revise the updated date at the bottom of this page. We encourage our users to frequently check this page for any changes to stay informed about how we are helping to protect your personal information we collect.

For information regarding Staff and Volunteer Data protection, please see our Staff and Volunteers Data Protection Policies.

All material on this website is protected by copyright.