

**Privacy Policy**

|  |  |
| --- | --- |
| Document Control | |
| Reference: | Privacy Policy\_1.2 |
| Version: | 1.2 |
| Originator: |  |
| Document Owner: |  |
| Stakeholders: |  |
| Published/Saved: | LPT Document Library |
| Board Approval: Required? |  |
| Effective Date: |  |
| Last Review Date: |  |
| Next Review Date: |  |

|  |  |
| --- | --- |
| **Related Documents** | |
| **Document** | **Relationship to this policy** |
|  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Document History | | | | |
| Date | **Version** | **Action** | **Amendments made** | **By Whom**  **(Name & Job Title)** |
| Nov 2022 | 1.1 |  | Added numbering. | Spencer Preece (Governance and Policy Administration Assistant) |
| April 2023 | 1.2 |  | Removed mention of VirginMoneyGiving. | Spencer Preece (Policy and Quality Assurance Assistant) |

|  |  |  |  |
| --- | --- | --- | --- |
| **Document Approval** |  |  |  |
| Version | Approved by; | Meeting & Minute Reference | Date |
|  |  |  |  |

1. **Introduction**
   1. The Little Princess Trust (“We”) is committed to protecting the personal data that we collect and process about you. We aim to be clear and transparent and not do anything you would not reasonably expect. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information.
   2. This document along with our Terms and Conditions of Use and our Cookie Policy explains how we collect personal information from you, what personal information we will collect, how we will use this personal information and why we need to collect it.
   3. We are committed to using your personal information in accordance with our responsibilities. We are required to provide you with the information in this Privacy Notice under applicable law which includes:
      * UK General Data Protection Regulation (‘UK GDPR’) and the Data Protection Act 2018 (‘DPA’) referred to as the ‘data protection legislation’
      * The Privacy and Electronic Communications Regulation (2003)
   4. By giving us your personal information, you agree to the use of it as set out in this policy.
   5. If you have any questions about this Privacy Policy, please contact us at The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ, email dpo@littleprincesses.org.uk, or telephone 01432 352359.
2. **Data Controller**
   1. The Little Princess Trust is registered as a Data Controller under number ICO: ZA200876. We are a charity registered in England whose charity registration number is 1176160 and our address is The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ.
3. **What information do we collect?**
   1. Personal information is information about yourself that can be used to identify you. Personal information we usually collect can include your name, date of birth, email address, postal address, telephone number, mobile telephone number, credit/debit card details and whether you are a UK tax payer so that we can claim Gift Aid.
   2. We may also collect information about your visits to our website, for example how you accessed our website, where you accessed our website from and what you searched for on our website. For more information about the more technical information we may collect, such as the IP address (the location of the computer on the Internet) and cookies, please see our Cookie Policy page.
   3. The UK General Data Protection Regulation (“UK GDPR”) recognises certain categories of personal information as sensitive and therefore requiring more protection.  For example, this includes information about your health, religious beliefs, ethnicity and political opinions.  We only collect special category data where there is a clear need to do so, such as to cater our 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 it.
4. **How do we obtain your personal information?**
   1. We collect information in the following ways:
      1. When you give it to us directly; This might be when you:

* Interact with us online
* Communicate with us
* Make a donation
* Take part in an event
* Fundraise on our behalf
* Order products or services from us
  + 1. Apply to work or volunteer for us.
    2. When you give it to us indirectly: This is when you give permission to other parties to share it with us. These might be:
    - Fundraising sites such as JustGiving or Virgin Money Giving
    - Sub-contractors in technical, payment and delivery services
    - Event organisers, for example the London Marathon
    - Analytics providers and search information providers
    - If you make a donation via social media sites such as Facebook or Instagram
    - If you request a wig via one of our partner organisations
  1. These independent third parties will only share your information with us when you have indicated that you wish to support The Little Princess Trust with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your information.
  2. We may also obtain information about you from a family member or a friend who contacts us on your behalf, or if a fundraiser passes on your details to us.
  3. If you are a young person experiencing hair loss your details might be passed to us by a health care professional, or a friend or relative.  We will use information given to us to contact you, but we will not process or store your information unless you (or your parent/guardian if you are under 18) give us consent to do so.
  4. When your information is available publicly or from other external sources, we may combine information that we already have about you with information available publicly or information available from external sources in order to gain a better understanding of you and to improve our fundraising methods, products and services.  
     Such information could be for example, socio-demographic and lifestyle information and information about previous donations you have made.  
     The information we get from other external sources may depend on your privacy settings or the responses you give, so you should regularly check them. For example, 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.  
     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.
  5. We may also obtain information about you where it is publicly available and found in places such as Companies House, Land Registry website and information that is published in articles and newspapers.
  6. As a charity, we take reasonable and appropriate steps to know who our donors are, particularly where significant sums are being donated.  
     We may conduct research, including accessing information which is already publicly available, on prospective donors, partners or volunteers to ensure it would be right for us to accept this support. This will help to give assurance that the donation is not from an inappropriate source and does not pose an ethical or organisational risk to The Little Princess Trust and the children and families we support.
  7. We may also obtain personal information about you from other sources, such as if a family member or friend contacts us on your behalf. We may also combine your personal information with other information we collect from third parties.
  8. To understand how we use information about the communications devices you use, such as IP address (the location of the computer on the internet) and cookies, please see our Cookie Policy.

1. **How do we use your personal information?**
   1. How we use your information would largely depend on why you are providing it.  We may use your information in the following ways:
      * To provide you with the information, support, services or products you have requested from us
      * To gain a full understanding of your situation so we can develop and offer you the best possible personalised services
      * To keep a record of your relationship with us and for internal administrative purposes (such as our accounting and records), and to let you know about changes to our services or policies. We use your personal information to look into, and respond to, complains, legal claims or other issues
      * To process your donations
      * To claim Gift Aid on your donations
      * To carry out statistical analysis and research in order to help us to understand how we are performing and how we can improve our services and meet the needs of people that require our help
      * To notify you about changes to our service
      * To allow you to participate in interactive features on our website, when you choose to do so
      * To improve our website to ensure that content is presented in the best way for you and your computer
      * To further our charitable aims, including for fundraising activities
      * To provide you with information about the goods and services we offer, if you have agreed to receive this information
      * To prevent fraud, misuse of services or money laundering and to perform due diligence in respect of larger donations
      * To process your application for a job or volunteer role with us
      * We may also use your personal information for other purposes which we specifically notify you about and, where appropriate, obtain your consent
   2. If you are receiving a wig from The Little Princess Trust, we use your personal information to:
      * Supply and fit you with a wig
      * Check and make improvements to our services
      * Investigate any concerns or complaints you may have, either about your wig or the standards of any salon or wig fitter(s) looking after you

1. **Direct Marketing**
   1. When you have given us your consent, we use your information to send you communications about our work and how you can help us, for example, information about our events, fundraising activities and how you can donate to us.
   2. Occasionally, we may include information from partner organisations or organisations who support us in these communications. Our forms have clear marketing preference questions and we include information on how you can say no to such marketing.
   3. We rely on your consent for all marketing communications.
   4. You can let us know if you would prefer not to receive these communications at any time by emailing info@littleprincesses.org.uk, calling us on 01432 352359, or writing to us at The Little Princess Trust, The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ.
   5. You can also change or edit any of your contact preferences at any time (including telling us that you don’t want us to contact you for marketing purposes by telephone, or by post) by contacting our Supporter Services Team on 01432 352359 or info@littleprincesses.org.uk or you can write to: The Little Princess Trust, The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ.  
      If you have indicated that you do not wish to be contacted by us for marketing purposes, we will retain your details on a ‘do not contact’ list to help ensure that we do not contact you accidentally.
   6. However, we may still need to contact you if you carry on dealing with us, including (but not limited to):
      * Processing a donation you make or any continuing direct debit;
      * Providing you with information you need in order to participate in an activity or event for which you have registered;
      * Explaining and apologising where we have made a mistake; and
      * Dealing with future legal claims in connection with a contract we have with you
   7. You can also enter your details on the Fundraising Preference Service (FPS) website and choosing ‘Little Princess Trust (Charity Number 1176160). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at https://public.fundraisingpreference.org.uk/ or by calling the telephone helpline on 03003033517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days of your request.
2. **When your personal information might be shared with other people and why?**
   1. We will not sell, trade or rent your details to any third parties, but we may sometimes share your information with our trusted service providers who are authorised to act on our behalf, for example payment providers such as Enthuse to accept payments via our website, organisations organising fundraising events such as runs, and associated organisations who work on our behalf, or whom we work with in partnership to deliver and improve our services.
   2. If you have requested a wig from The Little Princess Trust, only with your express permission, your contact details will be passed to a salon or wig fitter local to you to supply and fit you with a wig.  We ensure that all salons and wig fitters are held to strict standards for data use and security.
   3. We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. We may have to share your personal information with other businesses and/or suppliers in order to provide you with products you have ordered.
   4. Where you have given us permission to contact you, we may pass on your information to external service providers to contact you on our behalf. We may need to share your personal information with our search engine providers so they can assist with the improvement of our website.  
      If another party wants to invest in us or we are taken over by another party, we may need to share your personal information with them. In addition, from time to time we may exchange your personal information with other organisations for the purposes of fraud reduction.  
      We may also share information with our financial and legal advisers for the purposes of obtaining advice and protecting our legal rights. We may also share your information with the emergency services if we think there is a risk of serious harm or abuse to you or someone else.
3. **Where we store your personal information**
   1. Your information is normally kept within the UK or within the European Economic Area (EEA) and this is a priority for The Little Princess Trust when selecting where we host and use your information.
   2. On some occasions, we may have to use services that host your information outside of these areas. For example activities could include among other things, the processing of your payment details, the provision of support services and the fulfilment of your order.
   3. When this occurs, we will only ever use highly reputable suppliers that have gone through information security due diligence, have contractual clauses about the high standard of data processing, and meet all requirements that your information is looked after to a standard as if it were in the UK or the EEA. For more information about this please contact us at [dpo@littleprincesses.org.uk](mailto:dpo@littleprincesses.org.uk)
4. **International transfers of information**
   1. We may, on occasion decide to use the services of a supplier outside the European Economic Area (EEA), which means that your personal information is transferred, processed and stored outside the EEA. You should be aware that, in general, legal protection for personal information in countries outside the EEA may not be equivalent to the level of protection provided in the EEA.
   2. However we take steps to put in place suitable safeguards to protect your personal information when processed by the supplier such as entering into the European Commission approved standard contractual clauses. When we transfer your personal information and process it in the United States, we do so in accordance with the European Commission approved standard contractual clauses. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.
   3. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy.
   4. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information to our website; any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access.
5. **How we protect your information**
   1. We use technical and corporate organisational safeguards to ensure that your personal information is secure. We limit access to information on a need-to-know basis and take appropriate measures to ensure that our people are aware that such information is only used in accordance with this Privacy Notice.
   2. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.
   3. Our online forms are always encrypted and our network is protected and routinely monitored.
   4. If you use your credit or debit card to donate to us or buy something online, we pass your card details securely to our payment processing partners. We do this in accordance with industry standards and do not store the details on our website.
   5. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including personal information) disclosed or transmitted over public networks.
   6. In cases when we use external websites provided by other organisations such as Twitter, Instagram, JustGiving, YouTube, Shopify or Facebook, then we would ask you to consult their privacy policies:
      * Twitter: www.twitter.com/en/privacy
      * Instagram: www.help.instagram.com/519522125107875
      * YouTube: www.youtube.com/intl/ALL\_uk/howyoutubeworks/policies/overview/
      * Facebook: www.facebook.com/privacy/policy/
      * JustGiving: www.justgiving.com/info/privacy-policy-versions/privacy-policy-v30
      * Shopify: www.shopify.com/legal/privacy
6. **How long we will keep your personal information?**
   1. The Little Princess Trust has specific criteria to determine how long we retain your information for, which are determined by legal and operational considerations.   
      For instance, we are legally required to hold some personal information to fulfil statutory obligations, for example the collection of gift aid or to support certain financial transactions, as well as to keep a record of your interactions with us.
   2. If you would like to know how long we will hold any specific information, then please contact us at dpo@littleprincesses.org.uk or you can write to us at our address: The Little Princess Trust, The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ, and we will provide you with further details.
7. **Your rights**
   1. The rights you have under data protection law are:
      * **The right to access your personal information**

You have a right to request access to the personal data that we hold about you.

* + - **The right to request a copy of the information we hold about you**

We will provide you with this unless legal exceptions apply.

* + - **The right to amend your personal information**

You have the right to have inaccurate or incomplete information we hold about you corrected.  If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

* + - **The right to instruct us to delete your personal information**

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.

* + - **The right to restrict how we use your personal information**

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations:  if some information we hold on you isn’t right; we’re not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

* + - **The right to object to us using your personal information**

If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your information. If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

* + - **Right for your personal information to be portable**

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

* + - **The right to complain to a supervisory authority if you think we are not using your personal information correctly**
    - **The right to withdraw consent for us to use your personal data**
  1. You may exercise any of your rights in relation to your personal information by contacting us on 01432 352 359 or by emailing dpo@littleprincesses.org.uk or you can write to us at our address: Data Protection Officer, The Little Princess Trust, The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ.
  2. We will always ask for your permission to use your personal information for marketing purposes or prior to sharing this information with a third party for such purposes. You will be asked to tick certain boxes on the forms we use in order to opt in to us retaining your personal information and permit us to use your personal information in this way.
  3. Our website may, from time to time, contain links to other websites. If you follow one of these links, please note that these websites will have their own Privacy Policies and that you will need to read these. Please make sure you read these policies before you submit any personal information to these websites.
  4. You can request a copy of the personal information we hold about you at any time. If you would like a copy of some or all of your personal information, please let us know by contacting us on 01432 352 359 or by sending an email to dpo@littleprincesses.org.uk or you can write to us at our address: The Hannah Tarplee Building, 22-25 Berrington Street, Hereford, HR4 0BJ.

1. **Changes to our Privacy Policy**
   1. We reserve the right to make changes to this Privacy Policy. Each time you visit this site you should check this Privacy Policy to check that no changes have been made to any sections that are important to you. Where appropriate, any changes will be notified to you by email.  This Privacy Policy was last updated in April 2023.
2. **Complaints**
   1. You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your personal information has been processed in a way that does not comply with the GDPR. You can do so by calling the ICO helpline on 0303 123 1113 or via their website https://ico.org.uk/.