

Privacy Policy

The Shakespeare Hospice is committed to protecting your personal data and this privacy policy states how we collect data, how we store it, and how we use it.

This privacy policy applies to the websites products and services offered by The Shakespeare Hospice, with the exception of our direct services with patients be they adult or children and their carers and families. These are covered by a separate Clinical Services Privacy Notice Policy (Please see Appendix 1).

The purpose of this policy is to give you a clear explanation about how The Shakespeare Hospice's collects and uses the personal information that 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:

Jayne Taylor-Farren
Head of Operations & Finance and Data Manager
The Shakespeare Hospice
Church Lane
Shottery
Stratford upon Avon
CV37 9UL

Email: jtaylorfarren@theshakespearehospice.org.uk

Tel: 01789 266852

The Shakespeare Hospice's is registered under the Data Protection Act 2018 registration no Z6383074, and any data collected will be used and held in accordance with the requirements of the Data Protection Act 2018.

For further information please select any of the following headings.

How do we collect information?

We obtain personal information from you when you enquire about our activities, register, apply to volunteer or work with us, send or receive an email, make a donation to us, ask a question about our services or otherwise provide us with your personal information. Sometimes 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 other organisations.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 1 of 15	Revision due by:	March 2023



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. For further information around this please see the marketing section below.

We will collect CCTV images for the sole purpose of incident investigation and potential liaison with the authorities e.g. Police.

What information do we collect?

The personal information we collect might include name, address, email address, telephone numbers, date of birth, bank account details (for setting up regular direct debit or payment information), and your family relationships to avoid duplicating communications.

Data Protection law recognises that certain categories of personal information are more sensitive. These are known as special categories of data and cover health information race, religious beliefs and political opinions. We do not usually collect special categories of data about our supporters.

However, we will collect sensitive data for employees, casual workers, or volunteers as part of our statutory, contractual, and management responsibilities.

How do we use your information?

We may use your personal information for:

- Dealing with your enquiries requests and complaints
- Processing your donations and orders made online or through our shops
- Providing you with information about our work activities events and services
- Complying with our legal obligations policies and procedures
- Providing and personalising our services
- Administering membership records
- Fundraising
- Conducting market research
- Recruitment, onboarding, and management responsibilities

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 2 of 15	Revision due by:	March 2023



Using your credit or debit card to donate or purchase through our shops

- 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.

How 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.

Marketing

Being able to communicate with you is important, as your support will help transform the lives of patients with life limiting conditions. And 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 use it.

We will use the details you provide to us to communicate with you about how your support is helping us to provide services to young people and adults in our community with a life limiting illness, ensuring that patients and their families are supported with the care and compassion they need. We would also like to tell you how your support is helping and other ways you can help in the future whether that's through volunteering, participating in events, or fundraising. From time to time we might also send you appeals asking for a donation so we can continue to raise the voluntary funding needed for our hospice.

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 its quick and easy to let us know that you no longer want to hear from us by calling the Fundraising team on 01789 266852, email

<u>fundraising@theshakespearehospice.org.uk</u>. We will always respond to your wishes in a sensitive, timely, courteous and professional way.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 3 of 15	Revision due by:	March 2023



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 pass your personal information on to other organisations for them to use for their own marketing purposes.

In certain instances, we collect and use your personal information by relying on the legitimate interest legal basis. This is because when you, for example, request to receive services or products from 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. However, 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 The Shakespeare Hospice.

We will only communicate to you in the way you have told us. For example:

Email/text marketing

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 The Shakespeare Hospice's emails or opting in to email communication from The Shakespeare Hospice's you grant us the right to use the email for email marketing.

Post/telephone marketing

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 or we receive a notification from the Fundraising Preference Service that you have requested marketing communications to stop. We also actively check telephone numbers against the Telephone Preference Service (TPS) and will only make telephone calls to you where your telephone number is listed on the TPS if you have specifically told us that you do not object to such calls and have consented to receive them from The Shakespeare Hospice.

It's your 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 on which we collect your data.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 4 of 15	Revision due by:	March 2023



You may opt-out of our marketing communications at any time by clicking the 'unsubscribe' link in at the end of our marketing emails or sending us an "opt-out" text message following the instructions we provide you in our initial text.

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 the Fundraising team on 01789 266852, email

fundraising@theshakespearehospice.org.uk.

Personalisation and Profiling

We also 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.

In order to do this, we may also use profiling techniques to provide us with general information about you, which you have volunteered around your lifestyle and purchasing habits. 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, and how your support is helping us to provide services to young people and adults in our community with a life limiting illness, ensuring that patients and their families are supported with the care and compassion they need.

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 fundraising 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 opt out of your data being used for profiling. However, this may mean that you stop receiving marketing communications from us or they become more generic and less relevant to you as they are no longer based on your interests in our cause. If you do wish to opt-out please contact the Fundraising team on 01789 266852, email fundraising@theshakespearehospice.org.uk.

Disclosures

We will never 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:

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 5 of 15	Revision due by:	March 2023



- To third parties who provide a service to us and are data processors. This would include our trusted partners that work with us in connection with our employment /volunteering charitable purposes, and other entities that may act as fundraisers for The Shakespeare Hospice, sell The Shakespeare Hospice's products or provide The Shakespeare Hospice's information and marketing (subject to your communication preferences and our internal policies and procedures). We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all our data processors and regularly monitor their activities to ensure they are complying with The Shakespeare Hospice's policies and procedures.
- Where we are under duty to disclose your personal information in order to comply with law or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation or we have your written consent.
- We need to perform due diligence checks to prevent money laundering from the proceeds of crime, reputational risks, and to ensure we do not engage persons that are unsuitable to work in an environment with vulnerable adults and children.

Consent from parents/guardians if you're under 13

We are committed to protecting the privacy of the young people that engage with us through our website and at fundraising events.

Our fundraising events also request specific information about the age of participants. Anyone under the age of 16 must obtain parental or guardian consent before participating in an event organised by The Shakespeare Hospice. Children aged under 13 must obtain the consent of a parent or guardian before providing any personal information.

Vulnerable Person Policy

Policy Statement

Fundraising activities, public support and public trust are all essential to The Shakespeare Hospice ability to achieve its overall objective of providing excellent care and compassion to young people and adults with a life limiting illness, and to those who matter to them, throughout Stratford upon Avon, the South Cotswolds and North Cotswolds.

We believe that giving to your favourite causes should be a positive experience for all, whether an existing donor or potential new supporter. Everyone should have the opportunity to donate if they are able to, but The Shakespeare Hospice recognises that it is inevitable that some of the many people that we engage with through our fundraising activities will not always have the capacity, at the point of the interaction,

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 6 of 15	Revision due by:	March 2023



to fully understand the nature of the donation they are being asked to give to The Shakespeare Hospice, or the consequences of making that donation.

The Shakespeare Hospice also understands that people in vulnerable circumstances may need further support before deciding whether to donate.

The Shakespeare Hospice recognises that it has an obligation to protect those in vulnerable circumstances. Whenever we suspect that someone we engage with is lacking capacity or is in vulnerable circumstances, we will take steps to terminate the contact in a way which seeks to protect that person while protecting their dignity and having due regard for any desire they have expressed to support The Shakespeare Hospice.

Whenever a fundraiser suspects that a person may be vulnerable; our approach is to immediately end the engagement. The Shakespeare Hospice will provide alternative options for the individual to engage with us once the conversation has ended, thereby upholding the right that everybody has, to donate if they wish to and are able to do so.

Keeping your personal information

We keep your personal information for as long as required to operate the service 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 2018 and the General Data Protection Regulation, you have the following rights:

- 1. The right to access your personal information
- 2. The right to edit and update your personal information
- 3. The right to request to have your personal information deleted
- 4. The right to restrict processing of your personal information
- 5. The right to object
- 6. 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.

Should you wish to exercise any of these rights, in terms of the information that we hold about you, you can make a request to see your data by completing a Subject Access Request Form – Please see Appendix 2which is available to download or

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 7 of 15	Revision due by:	March 2023



upon request. Alternatively, please ensure you provided us with all the requested information in an alternative written format to help us locate your records.

You must provide proof of your identity by enclosing two pieces of approved identification. Your request will be processed within 30 days of receipt of your request and all the relevant information we require.

Please address requests to

Jayne Taylor-Farren
The Shakespeare Hospice
Church Lane
Shottery
Stratford upon Avon
CV37 9UL

Email: jtaylorfarren@theshakespearehospice.org.uk

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. Please address requests to:

Jayne Taylor-Farren
Head of Operations & Finance and Data Manager
The Shakespeare Hospice
Church Lane
Shottery
Stratford upon Avon
CV37 9UL

Email: jtaylorfarren@theshakespearehospice.org.uk

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.

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.

Should you wish to exercise these rights please address requests to:

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022	Page 8 of 15	Revision due by:	March 2023
No: DSP001		•	



Jayne Taylor-Farren
Head of Operations & Finance and Data Manager
The Shakespeare Hospice
Church Lane
Shottery
Stratford upon Avon
CV37 9UL

Email: jtaylorfarren@theshakespearehospice.org.uk

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

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 these rights please address requests to:

Jayne Taylor-Farren
Head of Operations & Finance and Data Manager
The Shakespeare Hospice
Church Lane
Shottery
Stratford upon Avon
CV37 9UL

Email: jtaylorfarren@theshakespearehospice.org.uk

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.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 9 of 15	Revision due by:	March 2023



Alternatively, you can exercise this right by contacting: Jayne Taylor-Farren
Head of Operations & Finance and Data Manager
The Shakespeare Hospice
Church Lane
Shottery
Stratford upon Avon
CV37 9UL

Email: jtaylor@theshakespearehospice.org.uk

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 further.

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

If you wish to lodge a complaint or seek advice from a supervisory authority please contact:

The Office of the Information Commissioner Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: +44 (0) 01625 545 745

Website: www.ico.org.uk

Other websites

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.

Internet-based transfers

Given that the Internet is a global environment using it to collect and process personal data necessarily involves the transmission of data on an international basis. This means for instance that data you pass to us may be processed outside the

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 10 of 15	Revision due by:	March 2023



European Economic Area, although the data will always be held securely and in line with the requirements of UK data protection legislation. By communicating electronically with us you acknowledge and agree to our processing of personal data in this way.

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 www.allaboutcookies.org.

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 www.allaboutcookies.org. 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 data collected is not shared with any 3rd party. 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.

We use the following cookies on our site:

__atuvc on www.addthis.com

About this cookie:

This cookie is associated with the AddThis social sharing widget which is commonly embedded in websites to enable visitors to share content with a range of networking and sharing platforms. It stores an updated page share count.

There is no specific information about how this cookie is used on this site. If you own this website, or have any information about how this cookie is used on this site, please get in touch.

About this cookie's host: This domain is owned by Addthis. AddThis provides web widgets that site owners embed into their pages or other content, to enable visitors to create and share links to the content across social networks. They also make use of the data collected to provide advertisers and marketers with profile information for targeted, behavioural advertising. It has also recently been reported that Addthis makes use of experimental browser and canvas fingerprinting techniques, which

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 11 of 15	Revision due by:	March 2023



enables tracking of visitors without the use of cookies. These techniques also mean that most browser privacy settings are bypassed.

Related general information about atuvc:

Functionality Cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

More about cookie classifications.

First Party Cookies

One of the key attributes of a cookie is its 'Host' - this is the domain name of the site that ultimately sets the cookie. Only the host domain can retrieve and read the contents of the cookie once it has been set.

If the host name is the same as the domain in the browser address bar when it is set or retrieved, then it is a First Party Cookie.

First party cookies are only set or retrieved by the website while you are visiting it, so they cannot normally be used to track activity or pass data from one site to another.

However, the owner of that website can still collect data through their cookies and use that to change how the website appears to the user, or the information it displays.

Of course, they can also collect the data and use it outside their website, and even sell it on to other organisations. However, if they do this it must be explained in the site's privacy policy.

Most desktop browsers allow you to see a list of the cookies that have been set – and they will normally be listed by the host domain value.

Persistent Cookie

As the name suggests, this type of cookie is saved on your computer so that when you close it down and start it up again, it can still be there.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 12 of 15	Revision due by:	March 2023



Persistent cookies are created by giving them an expiry date. If that expiry date is reached, it will be destroyed by the computer. If the expiry date is not set then it is automatically a session cookie.

The expiry date will normally be saved as the time the cookie was first created plus a number of seconds, determined by the programmer who wrote the code for the cookie. However, there is no real limit on the expiry date - so it could be set to be 20 years in the future. In addition, if you revisit the website that served up the cookie, it may automatically place an updated version on your computer - with a revised future expiry date.

If you login into a website, then shut down your computer, start it up again, and go back to the website to find you are still logged in - then it is using a persistent cookie to remember you.

Persistent cookies are also used to track visitor behaviour as you move around a site, and this data is used to try and understand what people do and don't like about a site so it can be improved. This practice is known as Web Analytics. Since Google started providing its own analytics technology free of charge to website owners, almost all websites use some form of it - although there are also paid-for services available to rival Google's.

Analytics cookies are probably the most common form of persistent cookies in use today.

However, persistent cookies can also oddly, have a shorter life span than some session cookies, as they can be coded to be destroyed within a second or two of being set, whereas a session cookie will always last until you close down your browser.

gat & git - these are google analytics

ga	2 years	Used to distinguish users.
gid	24 hours	Used to distinguish users.
gat	1 minute	Used to throttle request rate.
AMP_TOKEN	30 seconds to 1 year	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022	Page 13 of 15	Revision due by:	March 2023
No: DSP001		•	



gac<propertyid> 90 days Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversion tags will read this cookie unless you opt-out Learn more.

Customization

Read the analytics.js <u>Domains & Cookies developer guide</u> to learn all the ways these default settings can be customized.

Read the <u>Security and privacy in Universal Analytics</u> document for more information about Universal Analytics and cookies.

ga.js - cookie usage

The ga.js JavaScript library uses first-party cookies to:

- Determine which domain to measure
- Distinguish unique users
- Throttle the request rate
- Remember the number and time of previous visits
- Remember traffic source information
- Determine the start and end of a session
- Remember the value of visitor-level custom variables

By default, this library sets cookies on the domain specified in the document.host browser property and sets the cookie path to the root level (/).

ASP.NET - this records ID sessions on the site

When a client communicates with a server, only the **session ID** is transmitted between them. When the client requests for data, **ASP.NET** looks for the **session ID** and retrieves the corresponding data. This is done in the following steps: Client hits the web site and information is stored in the session.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 14 of 15	Revision due by:	March 2023



Changes to the Privacy Policy

We may update this policy from time to time. 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.

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(s).

This document was last updated 15th March 2022.

Approved by: AA&MM		Revision No.	2
Date of Approval: 10/04/2018		Date of Implementation:	April 2018
Date of Review: March 2022 No: DSP001	Page 15 of 15	Revision due by:	March 2023