



## **SurreyFields Data Protection Policy**

**This policy will be reviewed on an ongoing basis, at least once a year.  
SurreyFields will amend this policy, following consultation, where appropriate.**

Date of last review: January 2021

File name: SF Data Protection Policy Jan 21

## Who We Are

SurreyFields is a Community Interest Company (CIC) set up to provide a home to light the spark between animals and people established in January 2021. Our registered office is SurreyFields c/o 165a High Street, Hampton Hill, Middlesex TW12 1NL .

## Data Protection

We care about your personal data and ensuring you're informed about how we use it. SurreyFields promises to protect your data, and to manage any information you share with us in line with data protection laws.

This Privacy Policy sets out how and why SurreyFields will collect and use your personal data and our legal basis for its use, to ensure you remain informed and in control of your information.

If you have any questions about how SurreyFields processes your information, please get in touch by phone on 0330 130 1160 or email [info@surreyfields.org](mailto:info@surreyfields.org).

## Types Of Personal Data We Collect

- Depending on your interaction with SurreyFields, we may collect some or all of following types of information about you:
- Your contact details, such as name, postal address and email address
- A record of our communications with you
- Your giving history
- Your interests, and reasons for your support
- Information collected as part of our research, such as details relating to your personal circumstances
- Information about your pet
- Photography and videography, such as images at events, case studies and other marketing materials
- Sensitive information

Under data protection law, certain categories of personal information are recognised as sensitive, including health information, family structure, race, religious beliefs and personal circumstances. SurreyFields will sometimes collect sensitive personal data, the following provide examples of such situations, it is not an exhaustive list:

- Where you volunteer or apply for a job with us
- When you share health/medical data with us relevant to support your participation in or volunteering at an event.

In these cases, we will obtain your consent to process this data, or alternatively ensure that we have a valid legal basis for doing so, such as when it is in the substantial public interest.

## Where Does This Information Come From?

Most personal data we process is given to us directly by our supporters, customers and volunteers in the course of their interactions with us.

We may also receive your personal information when you donate to SurreyFields through third-party services such as Just Giving.

We occasionally use external lead-generation organisations to provide us with the contact details of people who've expressed an interest in SurreyFields, and agreed to receive communications from us. In addition, we sometimes conduct research using third party sources, as set out in the "Analysing your information" section below.

In some situations, we may update our supporters', customers' and volunteers' personal information using information from public registers or other agencies. For example, we might do this to check we have a valid and deliverable postal address for you, or to check if you are on Telephone Preference Service (TPS) or Fundraising Preference Service (FPS).

## How We Use Your Data

In simple terms, your personal data may be used to help us effectively deliver our charitable services or to help us raise funds for those charitable services.

We have summarised the different reasons why we do this (these are often referred to as 'purposes'). How we use your data for these purposes will depend on the nature of our relationship with you.

CATEGORY	EXAMPLES OF PURPOSES FOR WHICH WE COLLECT, STORE AND PROCESS YOUR DATA
VOLUNTEERING	<ul style="list-style-type: none"><li>• To enable us to recruit volunteers</li><li>• To support and train volunteers and ensure their safety</li><li>• To enable us to communicate with volunteers regarding their volunteering work, the wider work of SurreyFields and how they might support in other ways</li></ul>
MARKETING AND FUNDRAISING	<ul style="list-style-type: none"><li>• To send you marketing including behind the scenes news, updates about animals, general information about rehoming, volunteering and various ways you can support SurreyFields, including fundraising, events and campaigning</li><li>• To efficiently raise the fundraising income to allow us to provide a home to light the spark between animals and people.</li><li>• To manage, facilitate and record financial transactions associated with fundraising</li><li>• To manage events and fundraising activities</li></ul>
SPONSORSHIP	<ul style="list-style-type: none"><li>• To process your donation and send you confirmation</li><li>• Where Sponsorship is a gift, to tell the gift recipient who their gift is from</li></ul>

RAFFLES	<ul style="list-style-type: none"> <li>• To process your payment and to enter you into the draw</li> <li>• To confirm your entry into the draw via email if you entered online</li> </ul>
LEGACIES	<ul style="list-style-type: none"> <li>• If you have gotten in touch with us about leaving us a legacy, we will manage and administrate your legacy pledge</li> </ul>
EVENTS	<ul style="list-style-type: none"> <li>• To process registration fees, administer events</li> <li>• To collect and store images and videography with the purposes to promote future fundraising events</li> <li>• To obtain relevant information on health or medical conditions, to support the safe participation of event participants and volunteers</li> </ul>
MEDIA & PR	<ul style="list-style-type: none"> <li>• Contacting you about press enquiries and case studies to help promote our work</li> </ul>
DONATIONS	<ul style="list-style-type: none"> <li>• To process your donation and send you a thank you letter</li> </ul>
ENQUIRIES	<ul style="list-style-type: none"> <li>• To enable us to record, consider and reply to enquiries</li> </ul>
ANALYSIS, TARGETING AND SEGMENTATION	<ul style="list-style-type: none"> <li>• To better understand our supporters and allow us to serve you messages and marketing that are optimised for you and tailored to you, and to find more people like you</li> </ul>
RESEARCH	<ul style="list-style-type: none"> <li>• To send you surveys</li> <li>• To carry out research in relation to our supporters and services</li> </ul>
EMPLOYMENT	<ul style="list-style-type: none"> <li>• To enable SF to select and recruit staff</li> </ul>
PHOTOGRAPH / VIDEOGRAPHY	<ul style="list-style-type: none"> <li>• To archive and store images and videos for historical interest and event promotion</li> </ul>

## Volunteering

Volunteers provide invaluable support across all aspects of SurreyFields. Where you have provided us with your information to volunteer, we process this in order to recruit volunteers (for example, by reviewing volunteering applications), support/train volunteers and communicate with you generally about the work we do to ensure that you are kept well informed about SurreyFields, your own volunteering and how you can get more involved.

As mentioned, in some cases we may collect sensitive data about you so that we can ensure we meet any access, health or dietary needs you may have and to monitor equality and diversity.

## Event Participation

When you register to participate in one of our events, we will ask you to provide any relevant medical/health information that will allow us to support you in your participation. This is to ensure your safety and enjoyment of the event. This sensitive personal data is considered and treated as Special Category Data.

## Marketing And Fundraising

SurreyFields's marketing activity helps to provide a home to light the spark between animals and people and raise the income we need which enables us to do this. Our marketing activity also helps us to provide help to animals beyond our gates, such as through our community engagement work, educational and campaigning activity.

SurreyFields will seek your consent to send you marketing via email, phone or text message (SMS).

If you choose to hear from us in this way, you'll receive behind the scenes news, updates about animals, general information about volunteering and various ways you can support SurreyFields, including fundraising, events and campaigning. Examples include a monthly update email, emails inviting you to events, and email updates on our campaigning activity

SurreyFields will rely on legitimate interests to send you marketing and fundraising communications by post, if you have provided a postal address. Unless you tell us not to, we'll contact you by post with communications we believe you'll be interested in. If you would like to opt out of these communications, you can let us know by contacting us.

When you register to attend or take part in one of our fundraising or challenge events we will use your information to process the registration fees (if any), administer your participation in the event and provide you with information about the event.

We will never rent, swap or sell your details for marketing purposes.

You're free to change your contact preferences at any time, just let us know by contacting us.

## Financial Transactions

If you donate to us we'll process your debit or credit card details. We will also pass your card details securely to our payment-processing partner as part of the payment process. We do this in accordance with the Payment Card Industry Security Standard and don't store the details on our website or databases.

## Analysing Your Information

It's important for us to know why you choose to support SurreyFields, as this helps us to give you the information that is most relevant for you. We'll analyse your data in order to better understand your preferences, to improve our services, and to tailor our marketing communications to you. The information we'll use to do this might include things like your interests, preferences, and level of potential donations so that we can see who may be interested in supporting us or who may be able and willing to give more.

In some instances, we may add publicly available information to our analysis. This might include information that is contained in the Charity Commission Registers, press and web articles and Linked In.

SurreyFields also carries out generic click-through email tracking, which allows us to analyse when an email has been interacted with (e.g. opened or when links within it are clicked). This helps us to better understand the impact of our communications and success of our campaigns.

## How The Law Applies To SurreyFields Use Of Personal Information

We are required under law to make sure that we have a valid ground for processing your data. The law sets out six different grounds for when personal data can be processed (plus additional ones where sensitive data is used - should these become relevant in future operations they will be reviewed within this policy.

- Consent - (seeking your agreement to use and/or store your data as a record) for the purpose stated at time of collection.
- Legitimate Interest - necessary records, history of pet, personal circumstances which relate to rehousing or taking a pet into care

### Overview

SurreyFields will only process your personal information if any of the following apply:

- We have asked you for your express consent and have a record of this (for example, we will ask for your consent to send you marketing communications by email)
- We have a legitimate interest to do so. Our use will be fair and balanced and never unduly have an impact on your rights (for example, it is in our legitimate interests to analyse the data you provide so that we can improve our services and tailor our communications to you)
- We have a contract with you which we can only fulfil by using your personal information.
- We have a legal obligation to use or disclose information about you.

### Consent

In some cases we will rely on consent, for example, to send you or make marketing and fundraising emails, phone calls and text messages. In addition, if you register as a SurreyFields volunteer or Challenge Event Participant it can be very helpful if you share information on any medical conditions that may affect your ability to perform your voluntary work. You can withdraw consent for these channels and activities by contacting us.

### Legitimate Interests

This legal ground for processing means that we can process your personal information if we have a genuine and legitimate reason for doing so, and that reason is not overridden by your rights and interests as an individual.

Examples of the legitimate interests processing activities we undertake are:

## Business Objectives

## Processing Activities

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TO RAISE THE FUNDRAISING INCOME TO ALLOW US TO BE SurreyFields

- To process your donations where you have asked us to do so
- To send you marketing communications by post

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FOR ADMINISTRATION PURPOSES

- To deliver Sponsorship welcome pack
- To provide you with information necessary to an event you have signed up for
- To provide you with information about any fundraising activities you have agreed to take part in
- To follow up with you about your enquiry

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TO CONDUCT RESEARCH

- To conduct supporter satisfaction research
- To invite you to take part in surveys or research to help improve our services
- To conduct desk research to help identify high value supporters

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TO ANALYSE DATA TO BETTER UNDERSTAND THE PROFILE OF OUR SUPPORTERS AND TAILOR OUR COMMUNICATIONS TO THEM

- To analyse your data in order to better understand your preferences, to improve our services, and to tailor our marketing communications to you
- To use public sources to add to our analysis
- To conduct segmentation to allow us to make our marketing communications more relevant to you, and to enable us to identify potential new supporters

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TO RECRUIT AND MANAGE VOLUNTEERS

- To assess volunteer applications and recruit volunteers
- To communicate with volunteers about information that is essential to their role, and about the wider activities of SurreyFields
- To process volunteers data to effectively administer their close relationships with SurreyFields and provide them with appropriate care and support

We have considered and balanced our legitimate interests against individuals' privacy rights in these scenarios and we do not believe that any adversely affect our supporters' rights or interests. If you would like to find out more or ask us to stop processing your data in these ways, you can do this at any time by contacting us.

## **Contractual relationships**

In some cases, we will be under a contractual obligation to provide you with goods and services, which means that we have to process your data in order to fulfil those obligations.

## **A legal obligation**

Sometimes we may have a legal obligation to process information about you – for example we are obliged to keep financial records. We're also required to keep a record of your communication preferences, in accordance with the General Data Protection Regulation.

## **Data Retention**

We'll retain personal information for different periods of time depending on your relationship with SurreyFields.

For example, if you donate to us, we'll keep your financial information for up to seven years after your last interaction with us.

We will keep some data indefinitely (for example, your name and giving history). It's important for us to retain this information as a majority of SurreyField's legacy income comes from people we weren't aware would leave us a gift in their will. Sometimes this legacy is left decades after the supporter's last interaction with SurreyFields. Knowing that the individual was a supporter in the past is important for us to know in case that will is contested.

In these cases, we'll only retain data that is necessary for these purposes, and we will delete or anonymise other parts of the record.

If you decide you no longer wish to hear from us, we'll need to keep a note of that on our suppression list indefinitely.

If you'd like more information on our retention policy, please contact us.

## **Data Storage**

SurreyField's operations are based in the UK and we store our data within the European Economic Area (EEA).

Some organisations which provide services to us may transfer personal data outside the EEA for processing purposes, but we'll only allow them to do so if your data is adequately protected (for example, if they are certified under the EU/US Privacy Shield scheme, or if we have a prescribed contract in place with them).

## **Data Sharing**

SurreyFields will not exchange or sell your personal information to another organisation for their own marketing purposes.

However, there are some situations where we may have to share your personal information with other organisations. An example could be sharing your details to reunite you with a lost animal via a vet, or to update microchipping databases. In some cases, we may have to share data about you when requested to do so by statutory agencies, such as the police.

We may also share your data with our contracted suppliers, and external service providers, such as our:

email service providers;

In these situations, the relationship between SurreyFields and the third-party data processor will be governed by a contract and strict security requirements will be in place to protect your personal information.



## Your Data Protection Rights

When SurreyFields is using your personal information on the basis of your consent, you have the right to withdraw that consent at any time. You also have the right to ask SurreyFields to stop using your personal information for direct marketing purposes. Simply contact us and we will amend your contact preferences.

Presuming that these rights are not overridden by our legal obligations, or where our legitimate interests are not overridden by your rights and interests as an individual, you have the following data protection rights:

### Right to be Informed

You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

### Right of Access

You can contact us asking what information we hold on you and to request a copy of that information. From May 2018 we will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

### Right of Erasure

From May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). We'll be required to keep an appropriate record (such as a suppression list) so that we can make sure you don't receive future communications. In some instances a legal basis will override the right to erasure. An example of this would be the legal requirement to record financial transactions for seven years.

### Right of Rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

### Right to Restrict Processing

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

### Right to Data Portability

Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to a competitor.

### Right to Object

You have an absolute right to stop the processing of your personal data for direct marketing purposes.

### Right to object to automated decisions

In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions that have a legal effect on you, you have the right to object. This right is more applicable to mortgage or finance situations; SurreyFields does not undertake complex computerised decision-making that produces legal effects.

## Filming And Photography At Events

Please note that SurreyFields (or our authorised service providers) or our commercial partners may film or photograph participants, volunteers and spectators attending or taking part in events and use such footage or photographs.

We do this in order to publicise the event for commercial and/or fundraising purposes including, but not limited to: television broadcasts, advertising, publications, marketing material, merchandising, social media, personalised direct mail and other media that may be made available to the public. Secondly, to enable our commercial partners to publicise their involvement and/or association with the event.

No personal details (including names) of any under 16-year-old participants will be used in any publicity materials without the written consent of their parent or legal guardian, but we may use images where children are incidentally included (for example, images of mass participation in the warm-up exercises, or on the starting line).

## Notification Of Changes To This Privacy Policy

This Privacy Policy may change from time to time. For example, we will continue to update it to reflect new legal requirements. Please visit this website page to keep up to date with the changes to our Privacy Policy.

## What To Do If You Are Not Happy

SurreyFields is committed to maintaining high standards in all of its work. The charity engages with donors, partners, volunteers and its customers in many ways. This includes various fundraising activities such as direct mail and street fundraising, and direct communications through social media and the press. Supporters also have the opportunity to engage with SurreyFields through community projects and rehoming activities.

SurreyFields is committed to maintaining good relations with all supporters, donors, partners, volunteers and its customers and aims to always treat people with respect care, integrity and dignity.

In the first instance, please talk to us directly so we can help resolve any problem or query. You can reach us on: Phone: 0330 120 1160 Email: [info@surreyfields.org](mailto:info@surreyfields.org) Post: Our registered office is SurreyFields, c/o 165a High Street, Hampton Hill, Middlesex TW12 1NL.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their helpline 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)

## Contact us

If you have any questions about this Policy, or about how SurreyFields manages your data, please contact us:

Phone: 0330 120 1160

Email: [info@surreyfields.org](mailto:info@surreyfields.org)

Post: SurreyFields, c/o 165a High Street, Hampton Hill, Middlesex TW12 1NL

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