

## **Privacy Notice: Funders, Donors and Website Users**

At Buttle UK, we respect your privacy and we are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you:

- visit our website;
- make donations to us; or
- otherwise assist us in the work that we do.

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website and otherwise in your interactions with us. This notice explains your privacy rights and how the law protects you.

#### **Controller**

We are Buttle UK, a charity registered with the Charities Commission in England & Wales (charity registration number 313007) and the Office of the Scottish Charity Regulator in Scotland (charity registration number SCO37997). We are a charitable trust and so the Trustees of Buttle UK control and are responsible for your personal data. Our address is 15 Greycoat Place, London SW1P 1SB.

If you have any questions about this policy, you can contact us by emailing [privacy@buttleuk.org](mailto:privacy@buttleuk.org)

#### **Changes to the privacy notice and your duty to inform us of changes**

This version of our privacy policy was last updated on 23rd May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect only that personal data from you that we need in order to operate our charity in the way that you would anticipate.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**As a donor or grant funder:**

<b>Contact Data</b>	includes first name, last name and email address, telephone number, residential and business addresses.
<b>Communications Data</b>	includes emails, content submitted via website, notes of conversations and meetings, records of conversations and meetings.
<b>Financial Data</b>	includes payment or direct debit instructions, may include bank account and payment card details, billing address, gift aid details.
<b>Donation Data</b>	includes details about donations you have made to us.
<b>Marketing Data</b>	includes information about your direct marketing preferences, for example whether you have agreed to receive marketing emails or newsletters from us.

**As a website user:**

<b>Contact Data</b>	includes first name, last name and email address, telephone number, residential address
<b>Communications Data</b>	includes emails, notes of conversations, and records of conversations.
<b>Technical Data</b>	includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
<b>Usage Data</b>	includes information about your use of our service, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); elements you viewed or words you searched for; page response times; download errors; length of visits; interaction information (such as scrolling, clicks, and mouse-overs).

In respect of our website, we also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### 3. How is your personal data collected?

#### As a donor or grant funder:

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Contact, Communications, Financial and Donation Data by submitting information on our website or by corresponding with us by phone, post, email or otherwise. This includes personal data you provide when we are discussing and processing donations from you.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, for example we may receive Contact Data from publically available sources such as Companies House and the Electoral Register.
- **Contact, Financial and Donation Data** from providers of donation websites such as Committed Giving, Just Giving or Virgin Money
- **Marketing Data** where you unsubscribe from our direct marketing email communications or email newsletters via Mailchimp.

#### As a website user:

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Contact and Communications Data by submitting information on our website. This includes personal data you provide when you enquire about our charity or otherwise show an interest in the work that we do.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

Technical Data from analytics providers such as Google based outside the EU who provide server monitoring tools to monitor the status of our APIs and the type and volume of queries being made to them.

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

From time to time, we will send to our donors or other interested parties, marketing communications by email about our services. We will only do so where you have expressly

consented to receiving such emails and whenever we send such a communication, we include an option for you to unsubscribe from receiving further such communications.

From time to time, we may also contact donors or potential donors by telephone to see whether or not you are interested in supporting our charity. You may inform us at any time if you do not want to be contacted in this way.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [privacy@buddleuk.org](mailto:privacy@buddleuk.org) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

**As a donor or grant funder:**

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To process your donation or grant and to otherwise administer our charity	(a) Contact (b) Financial (c) Donation (d) Communications	Necessary for our legitimate interests (to collect funds in order to provide charitable services to support individuals who are seriously affected by financial hardship)
To send you marketing material	(a) Contact (b) Marketing	Necessary for our legitimate interests (to raise funds in order to provide charitable services to support individuals who are seriously affected by financial hardship)
To manage our relationship with you	(a) Contact (b) Communications	Necessary for our legitimate interests (to build a relationship with you that is beneficial to the charity and the donor or grant provider, to tailor our charity offerings appropriately, to keep our records updated and to study how our charity is operating).

**Opting out:** You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

**As a website user:**

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To administer our charity and manage our relationship with you.	(a) Contact (b) Communications	Necessary for our legitimate interests (to promote our charitable services to support individuals who are seriously affected by financial hardship, to answer website enquiries, to tailor our charity offerings appropriately, to keep our records updated and to study how our charity is operating)
To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Contact (b) Technical	Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a charity reorganisation or group restructuring exercise)
To deliver relevant website content and marketing messages to you.	(a) Contact (b) Usage (c) Communications (d) Technical	Necessary for our legitimate interests (to study how individuals use our website, to grow our charity and to inform our marketing strategy)
To use data analytics to improve our website, our services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our charity and to inform our marketing strategy)

**Cookies**

Buttle UK's website uses cookies to enhance the user's experience while visiting the website. The website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their own computer or mobile device.

**What is a cookie?**

A cookie is a small file saved on to the computer's hard drive. It enables our website to identify your computer as you journey through our website.

Cookies allow websites and applications to track, save and store your preferences in order to present content, options or functions that are specific to you. This enables the website, through its server, to provide the users with a tailored experience within this website. They also enable us to see information like how many people use the website and which pages they prefer to visit. Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computer's hard drive they should take the necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors. However, please note that doing this may affect how our website functions and some pages and services may become unavailable to you.

Other cookies may be stored to your computer's hard drive by external agencies when this website uses referral links (e.g. Google and other search engines). Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

You can find out more about what internet browser cookies are and how to manage them at the [about cookies website](#).

If you want to block cookies, you can use a universal cookie blocker such as the [Google Analytics opt-out](#).

### **Cookies to enhance your experience**

We set the following session cookies when you visit our site:

<b>Name</b>	<b>Typical content</b>	<b>Expiry</b>
exp_csrf_token	randomly generated number	after two hours
exp_last_activity	randomly generated number	after one year
exp_last_visit	randomly generated number	after one year
exp_perpage	randomly generated number	after six months
exp_tracker	randomly generated number	when user exits the browser

### **Cookies for improving service**

We use Google Analytics cookies and other similar services to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to user's needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

We use the following cookies in this way when you visit our site:

<b>Name</b>	<b>Typical content</b>	<b>Expiry</b>
_una	ShareThis - Tracks use of the Share buttons	expires after 9 months
_ga	Google Universal Analytics	expires after 2 years
_gid	Google Analytics	expires after 24 hours
_hjIncludedInSample	HotJar	expires when browsing session ends

### **If you don't provide personal data**

Where we need to collect personal data by law, or in order to process a grant application or a donation and you don't provide that data when requested, we may not be able to fulfil our role in that respect.

### **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third party IT service providers (including email service providers like Mailchimp and online survey providers like One Point Global and cloud service providers)
- Third parties to whom we may choose to sell, transfer, or merge parts of our charity or our assets. Alternatively, we may seek to acquire other charities or merge with them. If a change happens to our charity, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **6. International transfers**

Our internal operating system is cloud based and the servers may be located outside the EEA. We have an arrangement whereby we ensure a similar degree of protection is afforded to all data on this system by ensuring that:

- EITHER we have contractual obligations in place with our cloud service provider which requires them to give personal data the same protection it has in Europe.
- OR: the cloud service providers is based in the US and is part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see section 9 below.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns about data protection before you approach the ICO so please contact us in the first instance.

### You also have the right in certain circumstances to:

<b>Request access to your personal data (commonly known as a "data subject access request").</b>	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
<b>Request correction of the personal data that we hold about you.</b>	This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.



<p><b>Request erasure of your personal data.</b></p>	<p>This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.</p>
<p><b>Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.</b></p>	<p>You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.</p>
<p><b>Request restriction of processing of your personal data.</b></p>	<p>This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</p>
<p><b>Request the transfer of your personal data to you or to a third party.</b></p>	<p>We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Any other questions?**

If you have any other questions about your personal data rights that are not explained here, please feel free to contact us at [privacy@buttleuk.org](mailto:privacy@buttleuk.org). You will also find further information about your personal data rights at the Information Commissioner's Office website: <https://ico.org.uk/>.