



Privacy Notice

How we respect privacy when we deal with personal information collected by our organisation

Who are we?

The Ripple Pond is a charity registered in England And Wales with The Charity Commission (1161224) and in Scotland with the Office of the Scottish Charity Regulator (SC046402).

The Ripple Pond is registered as a Data Controller with the Information Commissioner's Office (ICO) under the Data Protection Act 2018 (registration no. ZA135997).

Our head office is at **Mandora House, Louise Margaret Road, Aldershot, GU11 2PW**.

Any question relating to this Notice should be addressed to the Data Protection Officer by emailing data@theripplepond.org or by writing to us at our head office.

The Ripple Pond's Privacy Statement

Legislation exists to govern how personal information can be collected and used. The relevant legislation is currently the General Data Protection Regulation (GDPR) tailored by the Data Protection Act 2018.

Please read this Notice to understand how we use your data. In summary:

- Only information that we need is collected.
- Your personal information is only used for the purpose for which we collect it.
- Your personal information is only seen by those who need it to do their jobs.
- We will only disclose data when we have your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the GDPR (through contract; legal obligation, vital interests; public task; or legitimate interests).

Registered office: Mandora House, Louise Margaret Road, Aldershot, GU11 2PW

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www.theripplepond.org

- We will keep your information up to date. Inaccurate or misleading data will be corrected as soon as possible.
- Personal information is retained only for as long as it is required for the purpose collected.
- Your information will be protected from unauthorised or accidental disclosure and processed in an appropriate manner to maintain its integrity and confidentiality.
- We will provide you with a copy of your personal information on request (please see below for information on access rights and requests).

These principles apply whether we hold your information on paper or in electronic form.

What information do we collect?

Personal data is information about a living person who can be identified from that information (directly or indirectly). We collect, store and use (or “process”) personal data which may include:

- your name;
- your contact information (email address, phone number, home address);
- your date of birth;
- your gender;
- information relating to your health (if this affects how you might access one or more of our services);
- if you are a donor, whether you are a taxpayer and would like to enable us to claim Gift Aid; and
- any other personal information we collect in accordance with this Notice

For our members, we also process certain types of personal data which are considered to be in a ‘special category’ (because they are considered more sensitive) under the Data Protection Act 2018. Examples of this are:

- information about the health and other issues relating to the loved one that qualified you for membership, and
- detailed personal information you willingly share with us that is not ordinarily sought by us but which can be helpful to us in supporting you (which could include information about your health, your sexual orientation, your relationship situation, your racial or ethnic origin, your religious or philosophical beliefs, and your membership of a trades union or other representative body).

How do we collect your personal data?

We directly collect your personal data where you:

- provide us with information (for example, over the phone, face-to-face, or in an email); and/or
- consent to your information being provided to us through a third party (for example: through a fundraising application such as JustGiving or Virgin Money Giving, or through signposting from Veteran's Gateway or similar)

If you provide services to TRP, we will collect information in line with your contract for services.

We collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet, and which pages users visit most often and which services, events or facilities are of most interest.

Why do we collect this information?

We use your personal data for the following purposes:

- to promote the aims of TRP;
- to provide you with access to the services which you have requested;
- to communicate with you in general;
- to provide you with information you have requested;
- to claim GiftAid on your donations;
- for publicity and profile-raising purposes (for example the sharing of 'success' stories) and to aid our fundraising (but where you might be able to be identified your specific consent will always be sought);
- to administer and improve our website; and
- to satisfy legal and regulatory obligations

Our lawful basis for collecting and processing your personal data

Data privacy law requires us to rely on one or more lawful bases in order to process your personal data. For members of TRP, we rely on the following:

Basis	Detail
your consent	From time to time, we make seek explicit consent from you for a specific activity, for example identifying you in publicity material. This consent will never be assumed but will be required to be provided by you in a positive and informed manner. Where you have provided us with your consent previously, you can change your mind at any time and choose to withdraw that consent.
our legitimate interest	This is the principal lawful basis for processing personal data, where our legitimate interest means the running of TRP as a charitable organisation and pursuing our aims and ideals

For those other people we interact with (but including members who make donations under GiftAid), we rely on:

Basis	Detail
your consent	For example, by visiting our website you consent to us collecting technical information about your device. Where you have provided us with your consent previously, you can change your mind at any time and choose to withdraw that consent.
our legitimate interest	We have evaluated the basis upon which we lawfully collect, hold and process personal data for marketing and fundraising. The balance test we carried out concludes that we have a lawful basis to communicate with existing and potential supporters and volunteers. We therefore rely on legitimate interest to communicate with you
performance of a contract	Where processing is necessary for the performance of a contract to which you and TRP are parties
our legal obligations	For example, where we are obliged to share personal data of trustees with The Charity Commission

Do we share your information with anyone else?

If you are a member, we may share your personal data with other members in order you can access the services we offer. In the event we do so, this will only be your email address and contact phone number unless you specifically consent to other information being shared.

We may need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

If we become aware that you are at imminent risk of harm, or you are actually suffering harm, we will alert the appropriate emergency services and this may require disclosing your personal data.

We do not share any personal data except as described above unless your express consent has been obtained.

How we protect your personal data

We use appropriate technical and organisational safeguards to ensure we keep your personal data secure. We limit access to personal data 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 Notice.

How long will we keep your personal data?

We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to inform our research or the preferences of our supporters, to comply with the law and tax accounting rules, or to ensure that we do not communicate with people who have asked us not to.

When your information is no longer required, we will always dispose of it securely, in accordance with our retention of records policy.

Your rights

You have rights to the personal data about you that we hold. You are entitled to request:

- a copy of your personal data;
- correction of your personal data if it is incorrect;
- erasure of your personal data;

- that we stop using your personal data if you believe that the information, we hold is wrong, or that we don't have a valid reason for using it; and
- that we stop using your personal data where you object to us using it

These rights are all subject to eligibility and to legal exemptions.

If you seek information about the personal data we hold about you, we will ask you to complete a Subject Access Request Form. We will ask you for proof of your identity before we can act upon your request.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You should note that we are entitled to retain some or all of your personal data for statistical purposes; to comply with our legal obligations; or for the establishment, defence and/or enforcement of legal claims (potential or actual).

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline at [0303 123 1113](tel:03031231113).

Please note: TRP is not subject to the Freedom of Information Act 2000 and we will not therefore respond to requests for information made under this Act.