

Cornwall Air Ambulance Privacy Policy

PRIVACY AND DATA PROTECTION

Cornwall Air Ambulance Trust (“CAAT”) is a charity, registration number 1133295.

Cornwall Air Ambulance Trading Limited is a company registered at Trevithick Downs, Newquay, Cornwall, TR8 4DY with the Registered Company Number 10227352.

CAAT is registered with the Information Commissioner’s Office (“ICO”) with the Data Protection Registration Reference Z3491299.

CAAT is committed to dealing with personal data and privacy in accordance with the Data Protection Act 1998 and 2018 and the General Data Protection Regulation 2018 (“GDPR”). This notice states our practices surrounding your personal data, including how you can update your preferences or unsubscribe. We would encourage you to read each section and to contact us should you require more information.

If you would like this notice in a printed format, then please contact by email via enquiries@cornwallairambulancetrust.org or call 01637 889926. Occasionally, we may amend this notice and the changes will come into effect from the date it is amended on this page. The notice was last updated in February 2020.

> What is data protection?

The UK’s Data Protection law, and GDPR which came into effect in May 2018, controls how your personally identifiable information is used by organisations, businesses and the government. Everyone who processes data has to follow strict guidelines to ensure your data is processed fairly, lawfully and securely. Data has to be used for limited, specifically stated purposes in a way that is relevant and not excessive. The data held must be accurate and only kept for as long as is necessary.

We must ensure your data is not misused which is why we have clearly defined data protection and privacy policies.

> What will CAAT do with my data?

At CAAT, we will only use your data to help us to operate effectively and achieve our charitable objectives. We only collect data that is relevant or necessary to do this. You have rights with regard to your personal data which are laid out in the document below.

> How do I stop contact?

To stop receiving communications from CAAT, please get in touch with us either by

phone on 01637 889926, by emailing enquiries@cornwallairambulancetrust.org or by writing to Cornwall Air Ambulance, Trevithick Downs, Newquay, Cornwall, TR8 4DY. If we are asked not to contact someone again, we will mark this request on our database to ensure contact is not made again in the future. There is further information available on this in the section below titled 'Your Rights'.

To stop contact on a larger scale, there are services called the Telephone Preference Service (TPS) and Mailing Preference Service (MPS) which should reduce the number of communications you receive. There has been a new service set up called the Fundraising Preference Service (FPS) which allows individuals to stop all contact from particular charities (<https://www.fundraisingregulator.org.uk/the-fundraising-preference-service>).

Summary

When you communicate with us we collect certain types of information. It is important that you read the information given here in full to understand what information we hold, how we may use it, and what your rights are.

Briefly;

- We collect data to help us operate effectively; to provide services, goods or information, for fundraising and administration purposes, to better understand our supporters and to detect/prevent crime. You provide some of this data directly, for example in completing forms online, emailing and talking to us. Some is collected automatically when you visit our website (cookies).
- In some cases, we may undertake specific research to help us communicate with our supporters better, such as examining financial or other indicators.
- We may use your information for our own marketing purposes.
- We will never rent, sell or lease personally identifiable information to other companies or individuals.
- We only share selected data where we are required to by law, or with trusted partners who work on our behalf, such as our website provider, lottery provider, accountants and auditors.
- We will only keep your information for as long as is necessary or according to law (more information is available on this below).

Info we collect

We only collect relevant or necessary information to help us to achieve our charitable objectives and to allow us to communicate with you by your preferred method. You can change how you want to hear from us whenever you want by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926.

The information collected includes;

- personal data such as name, address, email address, date of birth, telephone number and anything else you are willing to share (which is necessary to help us to achieve our objectives).
- non-personal data such as IP addresses and website usage (through the use of cookies and analytics) to allow us to monitor website usage and constantly improve our service.

How we use your info

We will only contact you for marketing purposes where we have specific consent OR where there is legitimate interest for us to do so. These terms are explained in more detail below.

Consent:

This is where you have clearly agreed to specific communications by ticking a consent box on a form (or giving verbal or written confirmation) which is documented on your individual record on our charity database. You are able to change how we communicate with you at any time by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926.

Legitimate interest:

This is a lawful means of processing your data which ensures the needs of the charity and your needs are balanced and ensures any contact made by the charity only happens after a decision process has been undertaken. The communications we send using legitimate interest will never be intrusive and we will have no reason to believe that you would rather not receive them and, in addition, you will always have the option to 'opt-out'. Cornwall Air Ambulance could, using legitimate interest, communicate with you if you fall into one of the following categories:

- you have donated to the charity in the past three years
- you donate regularly to the charity by Standing Order or Direct Debit
- you play the Mission Maker Lottery
- you have registered and taken part in a CAA event
- you have donated goods to a CAA charity shop and have signed up for the Gift Aid scheme.

We will use information that has been provided to:

- communicate with our supporters and donors about things that that we think you would like to know (including information about how you can support our life-saving missions, information about fundraising/events and up-to-date news about the charity)

- process payments and donations
- deliver/collect products (especially regarding our charity shops and eBay)
- administer memberships (such as our Mission Maker Lottery)
- administer event registrations
- manage our volunteers
- record any contact we have with you on our database

Your Rights

Under the GDPR, you have rights to your information. These are listed below with more detail about each right:

> Right to be informed:

We keep you informed by outlining in our privacy policy how we use your data and why we use it. We only use your data in the way you have asked us to (unless we are legally required to do otherwise) where you have made your preferences known. We will make you aware of any changes to our privacy policy and any changes of how we plan to use your data, checking with you first before beginning any new processing.

> Right of access:

This is your right to see all the data we hold on you and check the reason we're holding it is appropriate. This means you can ask us to share with you a copy of all the data we hold on you and we can't charge you for doing so.

> Right of rectification:

You can ask us to change the details we hold on you if they are incorrect or incomplete. Please let us know of any changes to your personal details so we can amend them accordingly. You can let us know by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926.

> Right to be forgotten:

You have the right to be deleted from our database and we will consider any request to erase personal information. In some cases, we may be legally obliged to keep some details but will always keep the data held to a minimum to ensure we can identify you so that we do not contact you again (this is covered below by 'restricted processing').

> Right to restrict processing:

This is when we are permitted to store your personal data, but not use it for further processing. We can retain minimal information about an individual to ensure that the restriction is respected in future.

> Right to data portability:

This is where you have the right to obtain and reuse your own data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right to data portability only applies to personal data you have provided to us, where the processing of that data is based on either consent or the performance of a contract and when the processing is carried out automatically.

> Right to object:

This is your right to 'opt-out' or 'unsubscribe'. You have the right to object to your data being processed using legitimate interest or for the performance of a task in the public interest/exercise of official authority. You can also object to receiving direct marketing and your data being processed for research/profiling. To save you having to object to how we contact you, you can let us know how you'd like us to keep in touch by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926.

> Right in relation to automated decision making / profiling:

You have the right to not be subject to a decision which has been made solely by an automated process which produces legal effects concerning you. If you do not want your data to be used for any profiling of this nature, then all you need to do is opt-out by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926. Profiling and screening is explained in more detail in the section below.

> Right to complain:

If you believe there is a problem with how your data is being used then you have the right to complain. Please refer to the CAAT complaints policy in the first instance. You can complain to the Information Commissioner's Office (ICO) which is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals by visiting <https://ico.org.uk/concerns/>.

Data profiling and screening

Data profiling is when we examine our database and collect information or statistics about that data. You have the right to opt out of data profiling at any time and can do so by contacting us by email on enquiries@cornwallairambulancetrust.org or calling 01637 889926.

We might profile your data to find out more about your interests so we are more likely to contact you about products or events that you will be interested in and so we don't send you information that isn't of interest. By allowing us to profile your data, we can understand more about you as an individual and our supporters as a group which means we can tailor our communications more effectively and, in the long run, means we can

use your donations as cost effectively as possible.

Data screening is where we match your details against another database to ensure everything is up-to-date. An example of this would be checking our supporter's details against the National Change of Address database which would help us to keep in touch with you on your current address. Annually, our data is cleaned by an external company – this ensures anyone who is no longer at their address or has recently passed away can be suppressed or removed. By allowing us to screen your data we can save money by reducing the number of newsletters and other pieces of mail that are sent to the wrong person or place. Again, this will help us to use your donations in the most cost-effective way possible and help to ensure as much of your donation as possible goes towards our life-saving work.

Wealth Screening and Prospect research

Wealth screening is if not something we currently undertake, however if in the future we were to change our policy to use external information sources and compare our data with external data, using specialist agencies, to understand your financial position this would be added into policy documentation. CAAT has limited expertise and resources to carry out all this work in-house, and may sometime in the future wish to use an agency to compare our data with publicly available information. You can **opt out** at any time by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926.

Prospect research is where we do this manually, through reading media articles and referencing other publicly available information. This can help to identify people that are likely to have an affinity with our cause, and also understand better the type of relationship that they might prefer to have as part of their philanthropic giving.

We may undertake individual prospect research where we believe there is a reason to do so, and we will be in contact with you as soon as is practically possible and feasible to ensure you are fully informed of any data we hold about you. We will use Legitimate Interest as the legal basis for processing this kind of data so we need to make sure that your interests are examined in balance with the charity's (see 'How we use your information' above). Care will be taken when undertaking research to ensure that the sources of publicly available information that we use are assessed against your reasonable expectations to ensure that only relevant personal data is captured. You can **opt out** at any time by emailing enquiries@cornwallairambulancetrust.org or calling 01637 889926.

Why might we want to do this?

Wealth screening and prospect research helps CAAT to understand our supporters better so that we can tailor our communications and relationship with you. We might do this by looking at the information we have regarding your history and engagement

with us, how and when you have supported us in the past, the method of past giving and what message or communication initiated the gift. If you have already shown an interest in supporting CAAT, or we are made aware of another reason why a relationship between you and us may be beneficial, it helps us to understand how you might be able to help before we approach you.

From time to time the Charity carries out such research to ensure individuals are not inappropriately contacted either due to lack of interest in the cause, possible known preferences, or at a significantly higher financial level than it appears they could typically afford. The information we discover will not be used in a way that would be deemed 'unreasonable'. By doing this we minimise the potential of our research activity resulting in inappropriate contact. By being able to better understand existing supporters and potential new donors, we can be more cost-effective in our work – sending out appropriate, tailored communications that are more likely to be welcomed, rather than a 'one size fits all' approach.

If you are not happy for us to include your details if we undertake any screening or research, please let us know. If we undertake research on individuals that we then decide to contact, we will let you know what data we have collected as soon as is practical. We will ask for your preferences at this time and comply with your wishes.

Cookies / Google analytics

On our website, we endeavour to keep personal information secure by using SSL technology which establishes a safe link between two computers.

In delivering our services, CAAT may make use of cookies or other technologies to evaluate and improve the effectiveness of certain pages on our site. Cookies are small pieces of information stored by the web browser on your computer's hard drive. They are used to assist in tailoring your return visits to a website or to assist in monitoring website usage. Cookies do not allow CAAT to identify the geographic position of the user of the relevant computer and we will not release website usage information, in whole or in part, to anyone. In your web browser, you can control which types of cookies you allow. You can turn cookies on or off using your browser's settings. You can delete cookies and clear your browser's cache (history).

Where there are links from the CAAT website to other websites, CAAT emphasises that it has no control over these sites, their content or the way in which they collect or use personal data. CAAT therefore strongly advises users to check the privacy policy of any site they visit.

Marketing

CAAT undertakes a range of marketing activities to keep our supporters informed and up-to-date with events and activities that are taking place to raise funds to keep our life-saving helicopter service flying. We also use marketing to reach new supporters. As a supporter, if you have provided us with your postal address, you may receive information about news, events, fundraising appeals/activities/campaigns, operational news and information that relates to our charitable objectives – we would encourage you to keep us informed of your communication preferences so we can keep in touch with you in the way that you want. You may change your communication preferences with us at any time by emailing enquiries@cornwallairambulancetrust.org or by calling 01637 889926. We will never rent, sell or lease personally identifiable information to other companies or individuals.

In the case of email marketing, we will only contact you by email if you have given us your explicit permission to do so. We will also always give you the chance to unsubscribe from email marketing.

Sharing your data

Our supporters are incredibly important to us, you keep the helicopter flying. Because of this, we will never rent, share or sell your information with any other organisation or individual for commercial purposes. However, in certain circumstances we may be required to share your information:

- we would share your data if we were required to do so by law
- we would share your data to fulfil our charitable objectives through services we cannot provide in-house such as; a mailing house to deliver our Air Time newsletter, our IT specialists who support our IT requirements, our database provider, our website provider, our lottery provider and research firms. We have data processing contracts with each provider we use to ensure your data is kept secure.
- we would share your data if we believed it was necessary to protect or defend our rights, property, personal safety of our people or visitors to our premises or websites.

Storing your info

The storage of our supporters' data is incredibly important to us and we have many security measures in place that protect your data from being lost or misused. We store your information both digitally and as hard copy. Digitally, it is stored on computers based in the UK and on a UK only cloud-based server. Anything that is held digitally is stored on a system that is password protected (for example, our supporter database or

email systems) and only authorised personnel may access this data. Anything that is held as hard copy is kept in locked cabinets that only authorised personnel can access. It is important to note however, that we cannot guarantee that loss or misuse of data will not take place but we will take as many security measures as possible to protect your data.

Under GDPR, data must only be kept for 'as long as necessary' and, as such, we have data retention policies in place. This ensures we will only process your data for as long as we need it to provide you with the goods/services/information you require. This also means that we can keep your data for as long as is necessary to comply with the law or to manage your relationship with us. Any data that is no longer being processed is disposed of securely.

How long we keep your information for

We are required by law to keep some data/information for a specified length of time (such as Gift Aid declarations which are held for six years).

When you support the charity by giving a donation or playing our Mission Maker Lottery, we will keep your details on our database for a period of time in case a query needs answering and also to enable us to keep you informed with our latest news and events (unless you have asked us not to). We also keep basic information on file for suppression purposes (see the section above 'right to be forgotten' and 'right to restrict processing').

For more details, please contact us and ask to see our Data Retention Policy.

Contact us

If you have any queries about your data with regard to Cornwall Air Ambulance, please do get in touch. Our Data Controller is Stephen Murdoch – as we are a small organisation, it is not necessary for us to appoint a 'Data Protection Officer'. Instead, we have an Information Governance Group dedicated to ensuring that all data protection regulations are adhered to who have been given the authority to make decisions on data protection by the Board of Trustees.

Phone: 01637 889926

Email: enquiries@cornwallairambulancetrust.org

Post: Trevithick Downs, Newquay, Cornwall, TR8 4DY.

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