

Privacy Policy (Website)

Author:	Director of Operations
Authorised by:	Chief Executive Officer
Date:	03/03/2020
Signature:	<i>CEO</i>
Approved by:	Board
Date:	03/03/2020
Signature:	<i>Board</i>

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	Date of Next Review:	August 2021

Policy Statement

At Lewis-Manning Hospice Care, we are committed to protecting and respecting your privacy and this Privacy Policy, together with our website Terms and Conditions states how we collect data, how we store it and how we use it.

This Privacy Policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Our lawful basis for processing your data

We are under a lawful obligation to comply with the requirements of the Data Protection Act 2018, the General Data Protection Regulations (GDPR) 2018 and the NHS/Caldicott Guardian requirements for confidentiality and information security standards.

We must have a lawful basis for processing your information; this will vary on the circumstances of why we process and how we use your information as follows:

- **Legitimate interests:** our activities as a charity that provides patient care, and also in raising awareness of our services by engaging with current and future supporters (see Legitimate Interest Rationale);
- **Legal obligation:** the processing is necessary for compliance with a legal requirement to which we are subject, e.g. we must provide certain contact information and other details about our services to HMRC and the Charities Commission;
- **Public interest:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law;
- **Contract:** the processing is necessary for a contract we have with the individual, or because they have asked us or you to take specific steps before entering into a contract.

Who is Lewis-Manning Hospice Care?

Lewis-Manning Hospice Care is Poole's voluntary hospice offering free specialist palliative nursing care to the people of Poole, Bournemouth, Purbeck and the surrounding towns and villages living with cancer and other life-limiting illnesses. We are a registered charity (Registered Charity Number 1120193), regulated and inspected by the Care Quality Commission and with the Information Commissioner in accordance with the Data Protection Act 2018.

How do we collect information from you?

We obtain personal information from you when a referral is made to us, when you make

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a donation to us, enquire about our events and activities, register with us, send or receive an email, ask a question about our services, play our Lottery run by Local Hospice Lottery, or otherwise provide us with your personal information.

In order to provide safe and effective care we collect and share personal data from other professionals including (but not limited to) community teams, GPs, hospitals, local authorities and/or clinical commissioning groups.

We also gather your personal data from organisations providing fundraising services on our behalf, such as, JustGiving, Donr.

What type of information is collected from you?

Personal data is any information that can be used to identify you. The personal information we collect might include your name, address, telephone number/s, email address, IP address (a number that identifies a specific computer or other internet device) and information regarding what pages are accessed and when. Cookie files and IP addresses will not identify you as an individual. For more information on cookie files and IP addresses please refer to our website Terms and Conditions. By continuing to use our site, you agree to our use of cookies.

If you make a donation online, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

We will only take as much information from you as is needed for the specific reason given and will not record non-relevant data.

How is your information used?

We may use your information to:

- process a donation that you have made;
- to carry out our obligations arising from any contracts entered into by you and us;
- dealing with entries into a competition;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications covered by our legitimate interest in contacting you (please see our Legitimate Interest Rationale), these may include information about campaigns, appeals and other fundraising activities;
- process a grant or job application;
- supporting your fundraising activity;
- complying with our legal obligations, policies and procedures.

You can have access to all information held about you, make changes, opt-out of all or

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specific communication, or request deletion of all or some of your personal data at any time.

If you wish to see our Data Protection Policy on the safe storage, handling and use of personal data please contact us as above. This document also refers to how we manage personal data held on employees and volunteers.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us (please see our Records Retention Policy and Procedure).

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for older people and our services, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by post, email, telephone or text message if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: fundraisingteam@lewis-manning.org.uk or telephone on 01202 708470.

How you can access and update your information

The accuracy of your information is important to us, therefore if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: fundraisingteam@lewis-manning.org.uk, telephone on 01202 708470, or

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write to us at: **Longfleet House, 56 Longfleet Road, Poole, Dorset, BH15 2JD.**

You have the right to ask for a copy of the information Lewis-Manning Hospice Care hold about you; this right to access is free of charge. However, we may charge a minimal amount if we receive repetitive requests for the same information, or if the request is manifestly unfounded or excessive.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. When you make a donation via our third party provider, JustGiving, the sensitive credit or debit card information that you enter online is encrypted and protected by them. The only information they supply to us is your name, address and email address, and details of your donation. Please consult JustGiving's Privacy Policy for more information.

In cases where we use external websites provided by other organisations, such as Twitter or Facebook, then we would ask you to consult their Privacy Policies.

Use of 'cookies'

Like many other websites, the Lewis-Manning Hospice Care website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This data helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. However this may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please make sure you have your parent/guardian's permission beforehand whenever you provide us with personal information.

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Review of this Policy

We keep this Policy under regular review. This Policy was last updated in March 2020.

Your Privacy

Lewis-Manning Hospice Care takes your privacy seriously. We are committed to protecting your personal information.

Contact Details

To exercise any of these rights, or if you have any questions or complaints about how we handle your data, please contact the Data Controller in the first instance in writing at Lewis-Manning Hospice Care, Longfleet House, 56 Longfleet Road, Poole, Dorset, BH15 2JD by email at enquiries@lewis-manning.org.uk, or by telephone on 01202 708470.

You can contact the Information Commissioners Office via email at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF, or by telephone 0303 123 1113, or by email at <https://ico.org.uk/global/contact-us/email/>

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EQUALITY IMPACT ASSESSMENT – SCREENING FORM

1. Title of document/service for assessment	Privacy Policy (Website)
2. Date of assessment	03/03/2020
3. Date for review	August 2021
4. Directorate/Service	Administration
5. Approval Committee	Board

	Yes/No	Rationale
6. Does the document/service affect one group less or more favourably than another on the basis of:		
• Race	No	
• Gender (including transgender)	No	
• Religion or belief	No	
• Sexual orientation, to include heterosexual, lesbian, gay and bisexual people	No	
• Age	No	
• Disability – learning disabilities, physical disabilities, sensory impairment and mental health issues	No	
• Marriage and Civil Partnership	No	
• Pregnancy and Maternity	No	
7. Does this document affect an individual's human rights?	No	
8. If you have identified potential discrimination, are the exceptions valid, legal and/or justified?	N/A	

9. If the answers to any of the above questions is 'yes' then:	Tick	Rationale
Demonstrate that such a disadvantage or advantage can be justified or is valid	N/A	
Adjust the policy to remove disadvantage identified or better promote equality	N/A	
If neither of the above possible, submit to Diversity Committee for review	N/A	

Screener(s)

Print Name: Director of Operations & Finance

Date Policy approved by Board	03/03/2020
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Upon completion of the screening and approval by Committee, this document should be uploaded to paper trail.

Consultation Process

Version	Date	Author	Level of Consultation
1	20/03/2018	Director of Operations	Board
2	20/08/2019	Director of Operations	Board
3	02/01/2020	Director of Operations	Board
4	03/03/2020	Director of Operations	Board

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