

Privacy Notice:

Cotswolds Dogs & Cats Home: RSPCA South Cotswolds

Last Update: 29th June 2018

Contents:

- 1. Who we are
- 2. Data Protection
- 3. Types of personal data we collect
- 4. Where does this information come from?
- 5. How we use your data
- 6. Adopting
- 7. Rehoming
- 8. Volunteering
- 9. Marketing & Fundraising
- 10. Financial transactions
- 11. How the law applies to CDCH's use of personal information
- 12. Data retention
- 13. Data storage
- 14. Data sharing
- 15. Your data protection rights
- 16. Filming and photography at events
- 17. Notification of changes to this policy
- 18. What to do if you are not happy
- 19. Contact us

Who We Are

The Cotswolds Dogs & Cats Home is an independent charity, which covers the South Cotswolds region and is affiliated to the national RSPCA. This means that all of the generous donations we receive from the community stay directly with the Cotswolds Dogs and Cats Home.

The Cotswolds Dogs & Cats Home (RSPCA South Cotswolds Branch) is a charity registered in England and Wales (Charity number 207006). The Charity can be contacted at Cotswolds Dogs & Cats Home, Beechmeadow Farm, Elmcote Lane, Cambridge, Glos, GL2 7AS.

Version 2:2

Data Protection

At the Cotswolds Dogs & Cats Home, our animals are the reason we exist, that's why we work hard to ensure we find them loving homes where they will be the centre of their new families' world. However, it's not only our animals that are important to us, you are important to us too. Our supporters, donors, customers, staff and volunteers are all essential to our operations and we couldn't survive without you. We care about your personal data and ensuring you're informed about how we use it. The Cotswolds Dogs & Cats Home is committed to protecting your data and to managing any information you share in line with data protection laws.

In this Privacy Notice the Cotswolds Dogs & Cats Home will tell you how we will collect and use your personal data. We will tell you here about any legal reason we have to use any of your personal data that we hold. We will also tell you how we will make sure that you stay informed and in control of your information.

Reading the notice carefully will help you to understand how we collect, use and store your personal information.

If you have any questions about how the Cotswolds Dogs & Cats Home processes your personal information, or anything else related to your personal data, please get in touch using the details in the 'Contact Us' section below.

Types of Personal Data We Collect

The reason you're in touch with the Cotswolds Dogs & Cats Home will dictate what information we may need about you. The information we need may include:

- Your contact details, such as name, postal address and email address
- Your date of birth
- Your financial information such as bank account details and relevant benefits
- Your gift aid declaration
- A record of our communications with you
- Your communication preferences
- Your giving history
- Your next of kin details, for example as an emergency contact for volunteers or staff members
- Photography and videography, such as images at events, case studies and other marketing materials (but only with your say so).

Sensitive Information

The Cotswolds Dogs & Cats Home recognises that, in line with current law, some personal information is classed as sensitive. This information includes data about your health, race and religion.

The Cotswolds Dogs & Cats Home will sometimes collect sensitive personal data for example, when you volunteer or apply for a job with us.

Version 2:2

The Cotswolds Dogs & Cats Home is committed to working in line with the Equality Act 2010 and is totally opposed to all forms of discrimination. We will not tolerate discrimination on any grounds.

In cases where we have collected your sensitive personal data, we will obtain your consent to process it, or alternatively, ensure that we have a valid legal basis to do so.

Where Does This Information Come From?

Most of the personal data we hold is given directly to us by you our supporters, donors, customers, staff and volunteers. This will have been during the course of your normal contact with us.

We may also receive your personal information when you donate to the Cotswolds Dogs & Cats Home through a third party such as JustGiving or BTDonate.

There are a few other groups that may give us some of your information, these include Statutory Bodies, other RSPCA branches and microchip database providers.

The Cotswolds Dogs & Cats Home does not use external lead-generation organisations or conduct research using third party sources.

How We Use Your Data

The Cotswolds Dogs & Cats Home will only use your data to help us effectively deliver our charitable objectives.

Below we summarise how and why we use your data. The use will depend on the nature of your contact with us.

Category	Examples of why we collect, store and process your data.
Rehoming Dogs, Cats and Other Animals.	 If you have completed a 'Perfect Match' form to rehome an animal from us, we will use the information you provide to help us find the right match for you. To provide you with aftercare services once you have rehomed an animal To keep you informed of the work of the Cotswolds Dogs & Cats Home via a quarterly newsletter
Taking in Dogs, Cats and Other Animals	 If you have contacted us because you can no longer look after an animal, we will use the information you provide to establish how we can best look after your animal whilst it is in our care. To assess how we might safely and permanently rehome your animal.

Version 2:2

	 To enable us to meet the relevant legal requirements where they apply to animals brought into our care. To provide the adopters at your animal's new permanent home with any information they might need to help your animal settle. Also to provide the adopters at your animal's new home with any relevant veterinary information you may have given us.
Employment	 To enable us to select and recruit staff for all areas of our operations and then fulfil our responsibilities towards these employees.
Volunteering	 If you have applied to become a volunteer, home visitor or foster carer with us, we will use information you have supplied to identify the most suitable placement for you. To support and train volunteers and ensure their safety. To enable us to communicate with volunteers regarding their volunteering work and the wider work of the Cotswolds Dogs & Cats Home in a quarterly newsletter.
Marketing and Fundraising	 To sufficiently meet our running costs to enable us to support all animals needing our care. To manage, facilitate, and record financial transactions associated with income generation. To manage events and fundraising activities. To manage the 'Beech Tree Nut' and 'Sponsor a Kennel' schemes, including renewal. To ensure that as many supporters as possible maximise the value of their donation through Gift Aid.
Legacies	 If you have got in touch with us about leaving us a legacy, we may communicate with your solicitors/executors regarding your legacy pledge.
Events	 To collect and store images and videography with the purpose of promoting future fundraising events (but only with your say so).
Media and PR	 Contacting you about press queries and case studies to help promote our work.
Donations	 To send you a thank you letter and process your donation. We will also use your information to recover Gift Aid from the HMRC if you have completed a Gift Aid Declaration Form.
Retail Trading	To fulfil orders for goods and services such as delivery or collection of furniture.

Version 2:2 Date: 29th June 2018

Enquiries	To enable us deal with and respond to any enquiry.
Photography/Videography	 To create an image library of our animals and their new families.
Clinic	 If you have contacted us to make use of our Clinic and welfare services, we will use information you give us to administer the voucher scheme and provide your animal with any medical treatment necessary.

Adopting

When you come to us to adopt a new animal friend, we will ask you to provide us with information that will help us find you the best match. This will include information about your home and personal circumstances. In some cases, in order to best meet both your and the animal's needs, we may ask for information about your health or mobility requirements.

Rehoming

If you ask us for help in finding your animal a new home, we will also ask for information about your animal and about you. This will include the reason or circumstances that led to you needing to find your pet a new home. This will include any information about your pet's behaviour towards yourself and others in the household that will help us with their care and onward rehoming.

When you ask us to help find your animal a new home, we will also ask for information that will help us to comply with the relevant legal requirements when finding them a new forever home. This may include establishing legal ownership and updating microchip details.

Volunteering

You, our volunteers, are an invaluable part of the work we do across all areas of our operations at the Cotswolds Dogs and Cats Home. We value your commitment and want to make sure we are only storing and using your information in ways that you are happy with. Where you have provided us with your information in connection with volunteering, we will process this in order to recruit volunteers, home visitors and foster carers (for example, by reviewing application forms). We will also use this information to support and train you in the roles you undertake and keep you informed about the work you are helping us with.

Version 2:2

Marketing and Fundraising

The Cotswolds Dogs and Cats Home does not carry out any direct marketing. Any marketing activity we carry out will be via streams such as our social media feeds and via our website. The only direct contact you can expect to receive from us will either be in relation to engagement initiated by you, or through our quarterly newsletter. Our newsletter will keep you up to date with work, activities, projects and events.

You can change your mind about receiving our newsletter at any point. Just let us know that you no longer wish to keep up to date with our work using the details in the 'Contact Us' section.

On specific occasions, we may rely on legitimate interests (see 'legitimate interests' below) to send you information by post about a campaign or event we thing you might be interested in. You can choose not to receive this information by contacting us using the details in the 'Contact Us' section.

The Cotswolds Dogs and Cats Home will never share any of your personal details for marketing purposes.

Financial Transactions

If you kindly donate to us, purchase something from our rehoming centre or our shops, give us an adoption fee, purchase a 'clinic voucher' or give us money in any other way, we will process your debit and credit card details. This will involve securely passing your card details 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 administration systems or databases.

If you have kindly added Gift Aid to your donation to the Cotswolds Dogs and Cats Home, we will use your personal information to claim this amount from the Government. In order to comply with the HMRC rules, we must maintain a record of the fact that you are a UK tax payer and the amount of Gift Aid we have claimed. This information is kept for six years after the year in which the Gift Aid was claimed.

How the Law Applies to The Cotswolds Dogs & Cats Home's Use of Personal Information

The law will only allow us to process your data if we have a valid reason to do so. The law sets out six different reasons that we can rely on to legally process your information (there are a few additional ones that cover sensitive data). Of these six reasons, there are four which are most relevant to the Cotswolds Dogs & Cats Home's use of your information. These four reasons are;

- Consent
- Legitimate Interest
- Contract
- Legal Obligation

The Cotswolds Dogs and Cats Home will only process the information you have given us if one of the following applies:

Version 2:2

- We have asked you for your specific **consent** and have a record of this consent (for example, to contact you about a volunteering opportunity).
- We have a **legitimate interest** to do so. Our use will be fair, considered and never have an adverse impact on your rights (for example, legitimate interest applies if we let you know about potentially suitable animals after you have filled in a 'Perfect Match' form).
- We have a **Contract** with you which we can only fulfil by using your personal information (for example, to invite you to 'keeping in touch' days during your maternity leave).
- We have a **legal obligation** to use or disclose information about you (for example, we are required by law to keep a record of Gift Aid declarations for six years).

You can find more detail about these reasons below.

Consent

In some cases we will rely on consent to contact you or share your information. For example, this might be to send you our quarterly newsletter via email or share information about a medical condition relevant to your work or volunteering with members of staff that may need to know. You can opt out of this consent at any time using the contact details in the 'Contact Us' section.

Legitimate Interests

Legitimate interest is the legal reason we can rely on to process your personal information if we have a genuine reason for doing so. These reasons only apply if they are not overridden by your rights and interests that are protected by law.

Examples of the legitimate interest we may have and use to process your data are summarised in the table below.

Business Objectives	Processing Activities
To allow us to provide the best possible care for every animal that comes to us. (Adoptions and Rehoming)	 To assess suitability for rehoming and to follow up with you about your rehoming enquiry. To capture the information we need when we take in an animal, to allow us to care for that animal and ultimately rehome it. To provide you with aftercare services once you have rehomed an animal from us. To conduct home visits to assess suitability as part of the rehoming process. To register new owners' details with microchip databases.
To enable us to sufficiently meet our running costs to allow us to be here for every animal that needs us.	To process your donations and Gift Aid where you have asked us to do so.

Version 2:2

For Administration Purposes	 To fulfil our obligations to you as an employer To follow up with you about your enquiry. To conduct out every day business of caring for and rehoming animals.
To recruit and manage volunteers	 To assess volunteer (including foster carer and home visitor) applications and recruit volunteers. To communicate with volunteers about information that is essential to their role, and about the wider activities of the Cotswolds Dogs & Cats Home. To process volunteers', foster carers' and home visitors' data to effectively administer their relationships with us and provide them with appropriate care and support.

We have carefully considered these legitimate interests against individuals' privacy rights in these scenarios and we do not believe that they have any adverse effect. 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 using the details in the 'Contact Us' section.

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. Some examples of this include if you are rehoming an animal from us or purchasing something from one of our shops.

A Legal Obligation

Sometimes we may have a legal obligation to process information about you. For example, we are obliged to keep financial records including Gift Aid for six years. Another example of a legal obligation is the requirement for us to keep a record of your contact preferences to comply with the General Data Protection Regulation.

Data Retention

We'll retain personal information about you for different periods of time depending upon your relationship with the Cotswolds Dogs & Cats Home and the reason for which we are holding your data.

For example, if you donate to us, we'll keep your financial information for up to seven years after your last transaction with us. If you rehome an animal, we'll keep details relating to your rehoming circumstances for 20 years (the upper limit lifetime of the dog or cat). If you arrange for the collection or delivery of furniture, we will keep your information for 3 months from the date of completion.

Version 2:2

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.

Data Storage

The Cotswolds Dogs & Cats Home is based in the UK and we store our data within the European Economic Area (EEA).

We may store some information on cloud based systems. However, we will ensure that your data is adequately protected by the cloud provider.

Where information is stored on third party supplier web based systems, we will ensure that the third party has adequate protection in place for your data.

Any information stored on portable IT equipment will be password protected and kept in a secure environment, in line with our IT policy.

Data Sharing

The Cotswolds Dogs & Cats Home will not share your personal information to another organisation for their own marketing purposes.

There are, however, some situations where we may have to share your personal information with other organisations. An example could be sharing data with the HMRC to fulfil our legal obligations, or with our payroll provider to process staff salaries. In some cases we may have to share data about you when requested to do so by statutory agencies such as the Department for Work and Pensions or the Police.

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

- Our delivery company
- Our pension provider
- Our lottery administrator

In these situations, the relationship between the Cotswolds Dogs & Cats Home and the third party will be governed by strict conditions and robust security will be in place to protect your personal information.

Your Data Protection Rights

When the Cotswolds Dogs & Cats Home is using your personal information on the basis of your consent, you have the right to withdraw that consent at any time. Simply contact us using the details in the 'Contact Us' section and we will amend your preferences.

Version 2:2

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:

The right to be informed

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

Right of Access

You can contact us at any time (using the details in the 'Contact Us' section) to ask us what information we hold on you. You can also request a copy of that information. As of 25th May 2018, we have 30 days to provide you with the information requested once we are sure that you have the right to see the requested record and we have confirmed your identity.

Right of Erasure

From 25th May 2018, you have the right to be forgotten (this means to have your personally identifiable data deleted). We'll be required to keep and appropriate record to make sure we don't re-contact you in the future if you do not wish us to – this is often referred to as a suppression list.

There are a few instances when a legal obligation will override the right to be forgotten. An example of this would be the legal requirement to keep financial records for six 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

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 (e.g. switching energy suppliers).

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

Version 2:2

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 in you, you have the right to object. This right is more applicable to mortgage or finance situations; the Cotswolds Dogs & Cats Home does not undertake this type of processing.

If you want to exercise any of these rights, please contact our team using the information in the 'Contact Us' Section.

Filming and Photography at Events

The Cotswolds Dogs & Cats Home or our commercial partners may film or photograph supporters, staff and volunteers at any of our events.

This footage or photographs may be used in order to promote our work via streams such as our marketing material, social media, website, publications and promotional screens, but only with your say so.

Notification of Changes to This Privacy Notice

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

What to do if you're Not Happy

In the first instance, please talk to us directly so we can help resolve any problem or query. Please contact us using the details in the 'Contact Us' section.

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at <u>public.fundraisingpreference.org.uk</u> or by calling 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line **0303 123 1113** or at www.ico.org.uk

Version 2:2

Contact Us

If you have any questions about this Policy, or about how the Cotswolds Dogs & Cats Home manages your data, please get in touch. You should speak to our Resource Manager or Rehoming Manager using the details below:

Phone: 01453 890014

Email: info@cdch.org.uk

Post: The Cotswolds Dogs & Cats Home

Beechmeadow Farm

Elmcote Lane

Cam Glos GL2 7AS

Version 2:2