

# Privacy statement

# Our commitment to your privacy

At Brooke we are dependent on the generosity of our supporters and the goodwill and trust of the public. We also depend on the goodwill and trust of all other organisations and individuals with whom we engage and work and those individuals who **benefit directly or indirectly from Brooke's work**. We are, therefore, committed to protecting and respecting your privacy. In addition, we have legal obligations to use your personal data in line with applicable laws, including the General Data Protection Regulation, the Data Protection Act 2018 and any **successor legislation ("Data Protection Legislation")**.

This statement (together with our <u>Terms of Use</u> and any other documents referred to in this statement or the Terms of Use) sets out the basis on which any personal information we collect from you or third parties, or you provide to us, will be processed by us. We shall refer to your personal information as personal data in this statement.

Please read the following carefully so you can understand:

- what our policies and practices are regarding your personal data;
- our promise to you about our practices;
- what information we collect about you, our legal bases for its use, what your personal data may be used for, how it will be stored and your rights in relation to your information.

By visiting www.thebrooke.org or any of our other sites or by providing us with any personal data in any other way you are accepting and consenting to the practices described in this privacy statement and the other documents referred to in it.

This privacy statement does not apply to our staff, volunteers, trustees and consultants who should receive separate privacy notices from us.

### Who we are

The Brooke Hospital for Animals ("Brooke") is a registered charity (charity number 1085760) and a company limited by guarantee (company number 4119581). Brooke's registered office is 2nd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3A 2BJ.

The Brooke Hospital for Animals Trading Limited ('Brooke Trading') is Brooke's wholly owned trading subsidiary. Brooke Trading Gift Aids all its profits to Brooke. It is a company limited by shares number 8959139 and its registered office is 2nd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3A 2BJ.

Within the context of this privacy statement, "we" means both Brooke and Brooke Trading.

Brooke and Brooke Trading are both data controllers in relation to the collection and processing of your personal data.

Brooke has branches and affiliate organisations in other countries. This privacy statement relates to information which is obtained by Brooke and Brooke Trading only. If you provide any personal data to any of our branches and affiliate organisations you will do so subject to the laws and regulations applicable in their country.

We **don't**, and promise not to, sell or swap any details that our supporters provide to us to or with any other organisation for their own purposes. We do share your details with some of our suppliers on a strictly need to know basis (and please see below regarding the arrangements we have in place with those suppliers). We respect your privacy and value your support and interest in working animals overseas and the work that you may do with us.

Please read this privacy statement to understand how we use your personal data.

#### How do we collect information?

We may collect and process the following data about you:

#### Information you give us

- You may give us information about yourself by responding to Brooke communications, filling in forms which we provide to you in person, by mail or on our sites <a href="https://www.thebrooke.org">www.thebrooke.org</a> and <a href="https://www.thebrooke.org">www.thebrooke.org</a> and <a href="https://www.thebrookeshop.org">www.thebrooke.org</a> and <a href="https://www.thebrooke.org">www.thebrooke.org</a> and <a href="https://www.thebrooke.org">www.thebrooke.org</a> and <a href="https://www.thebrooke.org</a> and <a href="https://www.t
- Supporters who wish to take part in the events that we organise from time to time will provide us with information that we need in order to administer their attendance.
- We may also collect information about individuals with whom we would like to stay in touch in person, for example, by swapping business cards at events.
- The information you give us may include your name, address, email address, phone number and, where you work for an organisation, the name and address and other details of that organisation. If you are making a donation to help our work we will also collect debit and credit card information and whether you are a taxpayer so that we can claim Gift Aid.
- We also collect information about individuals and their families who benefit directly or indirectly from Brooke's work.
- Under 18s: we ask young people who wish to take part in events to confirm that they are over 18.

• Vulnerable supporters: Brooke recognises that from time to time it may contact individuals who are vulnerable, for example, via its fundraising campaigns.

Please refer to the sections **below entitled "Protecting our supporters" and "Under 18s"** for further information about the protections we have in place to ensure that we protect vulnerable supporters and our approach to under 18s who wish to take part in events.

#### Information we collect about you

- Supporters: For the purposes of this statement supporters also includes those who donate to Brooke. We retain data which we collect from you when you complete a donation or sign up to an event and copies of any correspondence with you.
  - We do this to ensure we are contacting the most appropriate person, and providing communications which are most relevant. This allows us to target resources effectively, and raise more funds than we might otherwise be able to. If you would prefer us not to use such information, please just let us know (see the section "Can I change my Preferences" toward the end of this document).
- Additionally, we may collect data about individuals who work at organisations who we believe may
  have the potential to give Brooke a significant, high value donation. We may, for example, obtain or
  confirm your work contact details or gather more information about your role to ensure that we are
  contacting the appropriate individual at that organisation.
- Others: we may also collect data about individuals who work for or are associated with organisations with whom we work or partner or with whom we wish to work or partner or who we believe may wish to work for Brooke in a consultancy or similar capacity.
- Websites: In addition to the information you give us when filling in a form, making a donation, signing up to an event or placing an order on our websites, we collect aggregated or anonymous information about how you use the websites.
- For general guests to our website the information gathered is anonymous, but we can capture
  technical information, including the internet protocol (IP) address used to connect your computer to
  the Internet, your Brooke site login information, and the date, time and page used to make a
  donation to ensure the best experience and content possible.

#### Information we receive from other sources

- We may receive information about you where you visit our website via third party websites that are linked to it.
- We also work closely with suppliers and partners (including, for example, sub-contractors in technical, print, payment and delivery services and professional fundraising agencies who may

send out letters of appeal or who may make fundraising asks on our behalf) and may receive information about you from them.

- If you are a supporter or potential supporter we may also receive information about you from analytics providers and search information agencies. The reason we collect this data is to better understand the backgrounds and interests of our supporters. This enables us to send relevant, timely communications and ensure we allocate our resources more effectively, raise funds sooner and are cost-effective which we know is important to our supporters. Please see the previous section for more information about this activity.
- Depending on your use, settings and the privacy policies for social media sites such as Facebook,
  Twitter, Instagram or LinkedIn, we may obtain information from those services for example if you
  publicly tag us in a photo, leave a comment, make a donation or request that we send you further
  information. To change your settings on these services, please refer to their privacy policies which
  will tell you how to do this.
- You may be able to provide the personal data of other people to Brooke, for example via social media or where you assist someone to fill in our forms. **Before providing anyone else's data** to us, you must be sure that they are happy for you to do so.

How do we use the information we collect about you?

We use information held about you in the following ways:

#### Supporters (including those whom we contact at organisations which support Brooke financially):

- For administration purposes (for example we may contact you regarding a donation you have made, to check the details that we hold about you are correct or the event you have registered for).
- To keep a record of the financial support you have given us, for example, dates and values of previous donations.
- To keep a note of your preferences on what and how you want to engage with Brooke.
- To analyse the personal data we collect and combine it with other information which we have collected.
- To analyse the likely and actual results of fundraising campaigns.
- To raise funds (for example we may send you information about how you can support Brooke, for example, by taking part in an event or challenge).
- To contact you about upgrading your support for Brooke (for example, by changing the method by which you support Brooke financially by moving from a cash gift to a Direct Debit commitment).

- To provide you with the goods, services or online content you select and any other related goods or services we may provide.
- To keep you up to date with how your support is helping working animals and the communities in which they work.
- To invite you to events or to request your support for particular campaigns that we are running.
- For holding records that we are legally required to keep, for example regarding Gift Aid and for checking your Gift Aid status so that we meet HMRC and other regulators' compliance requirements.
- For contacting supporters who haven't given in a while to ask them if they wish to donate once again.
- If you make a donation on Facebook, we will use the details you provided to enable us to process your donation. If you consent to hear more about Brooke from Facebook, we will send you a follow-up consent confirmation email and will use your data to communicate with you about our work and ways in which you can support us.

#### Individuals and their families who benefit directly or indirectly from Brooke's work

We sometimes collect data about the owners of working animals and their families and local
providers of services. Where we wish to use this data for analytical purposes we will anonymise the
data. Sometimes we may wish to use your data (including photographs) for our campaigns. When
we do this we will ask you to complete and sign a form confirming that you agree to our use of your
data in this way.

#### For other people with whom we work

- Where you work with other organisations with whom we engage or wish to engage, to provide you with information about our work or our activities and to invite you to work with us.
- For lobbying and advocacy purposes where you work for an organisation we believe is engaged in seeking to improve animal welfare and livelihoods.
- We may share your information with members of staff of our affiliates and branches overseas
  including those who are based outside the EEA and they may contact you in connection with
  Brooke's work

#### All people with whom we engage

- For internal record keeping, including the management of any feedback or complaints.
- To ensure that content from our site is presented in the most effective manner for you and for the electronic devices that you use.

- To ask for your help in completing surveys about Brooke, its work and animal welfare generally.
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and the electronic devices that you use.
- As part of our efforts to keep our site safe and secure and to detect fraud and other abuses of our site.

Where possible we use aggregated or anonymous information which does not identify individual visitors to our websites

We do not usually collect "special categories of personal data" (such as information about health, political affiliations, race or ethnic origin) about our supporters and others with whom we work. We will only do so where there is a clear reason for obtaining this information. Some examples of situations where we may collect such information about you include:

- participation in a marathon or similar fundraising event;
- attendance at events or conferences that we organise.

In these situations, we need this information to ensure we provide appropriate facilities or support to enable you to participate in an event. You may also provide us with special categories of personal data as part of a supporter story that you have agreed that we can use.

How will we combine and analyse the data we collect about our supporters?

Data that we have collected from you or from other sources may be combined with information about your current giving and other data about you which we or our suppliers obtain from publicly available sources such as Companies House, the Electoral Register, housing market websites and the media (including newspapers and general use of the internet). We may use profiling and screening techniques on this combined data and/or on the data that you supply to us in order to inform us about your ongoing relationship with Brooke and to better understand your interests and preferences so that we can better understand our supporters. We also assess the capacity of some supporters (both existing and new) to give financially to Brooke more than they currently do.

We also work with specialist third parties to provide this information (and only when we have a contract with the supplier to do so). The specialist third party will access and provide publically available information for profiling and screening purposes to better understand interests, motivations and preferences to enable Brooke to communicate with our supporters and prospects alike in a relevant manner. Examples of the publically available sources they use are:

- 1. Public Registers including;
  - I. Companies House Data
  - II. Electoral Commission (Political Donations)
  - III. Electoral Roll (Open Register)

- IV. FCA (Financial Services Register)
- V. The Law Society
- VI. Land Registry

#### 2. Trade & Industry References

- I. Professional directories
- II. Charities Commission website
- 3. UK Reference Volumes including;
  - I. Who's Who
  - II. Debrett's People of Today
  - III. Debrett's Peerage
  - IV. City of London Livery Company information
  - V. Trustfunding.org.uk
- 4. Print and Broadcast Media including;
  - I. newspapers (The Telegraph, The Times and Sunday Times, City AM)
  - II. magazines
  - III. rich lists
- 5. Internet including;
  - I. general Google searches
  - II. company websites
  - III. online-only articles
  - IV. social media (justgiving.com, linkedin.com)

For more information on the current list of suppliers we use for this activity or to let us know you prefer us not to process your personal data in that way please call our Supporter Care Team on 020 7470 9393, write to us at Supporter Care, Brooke, 2nd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3A 2BJ, email info@thebrooke.org or use our website to contact us.

# Changes of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

# Protecting the rights of our supporters

Brooke always works using an ethical framework to ensure supporters (including donors) are not pressured into giving their personal data or into donating. We expect the same high standard of any professional fundraising agencies fundraising on our behalf to ensure your protection.

• Brooke recognises that from time to time it may inadvertently contact individuals who are not in a position to make a decision for themselves to donate and/or give personal data (for example via

fundraising campaigns).

- Brooke is committed to working with our professional fundraisers to have an agreement to have systems in place for identifying people in vulnerable circumstances and to ensure we are only making fundraising asks to genuine supporters in a position to make an informed decision to do so.
- Records are kept of supporters who may be in vulnerable circumstances and have wanted to
  donate to Brooke and/or give us their personal data and the decision made regarding the
  acceptance of their donation is recorded. This enables Brooke to check a supporter is happy to give
  and ensure we exclude them from future contact if requested. It allows better training of our
  fundraising partners and enables us to protect your rights should a complaint be made.

#### Under 18s

• We ask young people who wish to take part in events to confirm that they are over 18 and if they are not we ask that they obtain the consent of a parent or guardian before giving us their data and taking part in the event. When we collect information from children and young people we will make our reasons for collecting this information and how it will be used very clear. We will always take particular care with any information relating to under 18s.

## Lawful processing

We need a lawful basis for collecting and processing all personal data we receive from you. The law allows us to do this in a number of different ways. Below we list those that are the ones that we rely on when collecting personal data.

- Information is processed on the basis of someone's consent
- Information is processed on the basis of a contractual relationship
- Information is processed for a legal obligation
- There may be occasions where information is processed to protect the vital interest of an individual
- Information is processed on the basis of our 'legitimate interests'

As there is a range of legal grounds, we may process your personal data without your consent (and sometimes without your knowledge), in compliance with the below rules, where this is required or permitted by law.

#### Consent

We will always ask for explicit consent to send our supporters marketing and fundraising communications by email, SMS text and contacting you via social media. We will also ask for your consent to be contacted by phone. All our telemarketing campaigns are checked with the Telephone Preference Service and/or the Corporate Telephone Preference Service. We also check with the Fundraising Preference Service to ensure that we do not contact people who have asked not to hear from us.

We also check any data lists we may buy in from third parties against the Mail Preference Service and Fundraising Preference Service.

In some limited cases, for example when you provide your business card to us, we will retain and use your contact details and share your details with staff in our affiliates and branches on the basis that we treat this as your consent to us processing your data in this way unless you have informed us or inform us at any time that you do not wish to hear from us in this way.

You can always withdraw your consent to being contacted or you can change the communication channels we refer to above at any time. Where you are a supporter you can do this by contacting our supporter services team on 020 7470 9393 or email <a href="mailto:info@thebrooke.org">info@thebrooke.org</a>. If you are not a supporter please get in touch with your usual contact at Brooke in the first instance. Please be aware that we may still need to contact you where we are also processing your data under another legal basis. More information about this is provided in the contact us section of this privacy statement.

#### Contractual Relationship

In some cases where we have a contract with you such as supporters who purchase gifts from Brooke Shop we will process your personal data on the basis of the contractual relationship we may negotiate and enter into with you..

#### Legal Obligation

This includes where we have invited you to a Brooke event and we need to ensure that we comply with health and safety laws or where we are under a duty to disclose your personal data where ordered to do so by government bodies or law enforcement agencies or to protect Brooke in cases of suspected fraud or defamation. In addition we may rely on this ground in order to enforce or apply our terms of use or other terms and conditions or to protect the rights, property, or safety of Brooke, our supporters, or others.

#### Vital interests

Although this ground is not likely to arise, we will share your personal data without explicit consent to organisations (including the police and medical services) where we believe that there is a real and significant risk of harm to you or another person if we fail to do so.

#### Legitimate Interests

We use this ground to collect and process personal data if it is necessary for our legitimate interests, if it is used in a fair and balanced way and does not unduly impact on your rights.

We are currently relying on this ground for a number of different types of processing and the following are given as examples:

#### Existing supporters

• where you are an established supporter and we are contacting you by post and telephone about our activities, how you can make donations and other ways in which you can support us.

#### New supporters

• where you are a new supporter and we are sending you direct marketing communications by post.

Please see <u>more information about legitimate interest in direct marketing</u> and contact us if you would like further information on this issue.

Please see other examples of when we are relying on legitimate interest.

#### Stakeholders and contacts in other organisations

• Where we have an existing relationship with contacts in other organisations we will continue to contact you.

We may contact you by email or other means to commence our engagement with individuals in other organisations with whom we would like to partner or engage. In certain circumstances, we may rely on the fact that you have provided your contact details to us, for example, by giving us your business card or where we find your contact details on any public directory.

In these cases we will only do this for the purposes connected with your role at the organisation for whom you work. Please also see above regarding who we will share your data with.

#### Governance

- To help deliver our charitable aims (set out in our objectives)
- Internal and external audit for financial or regulatory compliance purposes

#### Fundraising and publicity

- Some types of marketing, publicity or advertisement and organising events (but not electronic communications with supporters)
- Exercising the right to freedom of expression or information, including in the media, for example in connection with animal welfare projects
- Analysis and targeting to develop corporate strategy and improve communication efficiency
- Processing for research purposes

#### Operational management

- Physical security, IT and network security
- Supporting programme work by managing travel for supporters
- Maintaining 'do not contact' lists (suppression files)
- Processing for historical, or statistical purposes

#### Financial management and control

- Processing financial transactions and maintaining financial controls
- Preventing fraud, misuse of services or money laundering
- Enforcing legal claims

#### Purely administrative purposes

- Responding to any solicited enquiry from any of our stakeholders
- Delivering information packs
- Administering of Gift Aid
- 'Thank you' communications and receipts

When we use your personal data under the legitimate interest basis we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal data in ways that are not unduly intrusive or unfair. If your personal data is being processed under the legitimate interest ground and you do not wish us to continue to do this you have the right to object under this lawful basis. If so please contact us.

### Data sharing

We never intentionally share, sell or exchange information about our supporters or other individuals with whom we engage with other organisations for their own marketing purposes.

We may share your personal data with the parties set out below:

- Brooke staff both in the UK and staff in our overseas affiliates and branches on a strictly 'need to know basis'.
- Third parties such as contracted external service providers to support our outbound telemarketing, postal campaigns, and email broadcast services as well as database analysis services, event organisers and media buyers. Our contracts with suppliers will include strict security requirements in order to protect your personal data. Our contracts with our suppliers will provide that where they sub-contract any parts of their work, they impose the same or similar requirements on their sub-processors as we have with them direct. Our contracts do not allow our suppliers 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.
- Third parties to whom we may choose to sell, transfer, or merge parts of our undertaking or our
  assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change
  happens to our organisation, then the new owners may use your personal data in the same way as
  set out in this privacy statement.

Our contracts with third parties require them to respect the security of your personal data and to treat it in accordance with the law.

## Transfer of personal data overseas

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be processed by staff operating outside the EEA who work for one of our affiliates or branches who are, with the exception of Brooke Netherlands, all based outside the EEA in countries in respect of which the European Commission has not issued any statement about adequacy of local data protection laws. In order to protect your personal data we have binding contracts with our affiliates and minimum data processing rules with our branches to ensure that they comply with Data Protection Legislation when processing personal data.

For financial and technical reasons we may, on occasion contract with suppliers who are based outside the UK and EEA, which means that your personal data may be transferred to that supplier and processed and stored outside the UK and EEA. This includes countries that are not considered to have the same standards for legal protection of personal data that you enjoy in the UK. We always take steps to choose highly reputable suppliers, who respect your security and we will always work with our

suppliers to put in place suitable legal safeguards with that supplier to protect your personal data, so that it is subject to the same privacy standards that you have in the UK.

For more information about this (and any safeguards we've taken) please contact us.

### Protecting your personal data

We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this privacy statement.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Although we take appropriate measures to protect your personal data, the transmission of information via the Internet is never completely secure, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We regularly run tests, including commissioning third parties to run those tests that check the security of our systems. All our payment pages are secure.

Please see the previous section for information about the systems we have in place when your information is transferred overseas.

## Your data protection rights

Your rights are expressly laid out in the Data Protection Legislation. The rights which are most relevant to you include the right to withdraw your consent to processing where this is the basis on which we process your data together with the following:

#### Right to be informed

You have the right to be told how your personal data will be used. This privacy statement and other statements that we use in our communications with you, are intended to be a clear and transparent description of how your information may be used.

#### Right of access

You have the right to obtain confirmation that your personal data is being processed, access to your personal data and certain other information about how we capture and process your data.

#### Right of rectification (or correction)

You have the right to request that we correct and update factually inaccurate information that we may hold about you or complete it if it is incomplete.

#### Right of erasure (also known as the right to be forgotten)

You have the right to request that your information be deleted from our systems and databases.

The right is not an absolute one and only applies in certain circumstances as follows:

- the personal data is no longer necessary for the purpose which it was originally collected or processed;
- we rely on consent, and you withdraw consent;
- we rely on legitimate interests, you object to the processing of your data, and there is no overriding legitimate interest for us to continue this processing;
- we are processing for direct marketing purposes and you object;
- we have processed the personal data unlawfully;
- we have to do it to comply with any legal obligation that we may have; or
- we are processing to offer information society services to a child.

If you have supported us with Gift Aid donations in the past, we have a legal duty to retain minimal information for HMRC for six years after your last donation. In many cases we would recommend that we suppress rather than delete your information completely otherwise you may receive a new contact if your details are provided to us from a company from whom we may buy details of potential supporters.

#### Right to restrict processing

You have the right to request that we restrict the processing of your personal data in the following circumstances:

- When you are contesting the accuracy of the data we hold, and we are verifying the accuracy of that data.
- When you have objected to the processing of your information under the lawful basis of legitimate interest, and we are considering whether our legitimate grounds override your own.
- When the processing is unlawful and you oppose erasure and request restriction instead
- Where we no longer need the information, but you have requested your data from us to establish, exercise or defend a legal claim.

#### Right to object to processing

You have the absolute right to stop the processing of your personal data in the following circumstances:

- for direct marketing purposes (including profiling)
- where we may be processing your information under the legitimate interest basis

#### Rights in relation to automated decision making and profiling

You have the right to object to automated decisions where we are using your personal data in a **computerised model or algorithm to make decisions "that have a legal effect on you"** or where they are profiling you, for example for wealth screening purposes.

#### Right to data portability

You have the right to data portability. This means that you can obtain and reuse your personal data for your own purposes across different services. It has been designed to allow citizens to copy or transfer their information from one IT environment to another e.g. from one banking service to another, or utility provider to another.

If you wish to exercise any of these rights please download the documents below for more information about what you need to do and how we will deal with your request:

- Data subjects' rights (PDF 138kb)
- <u>Data subject request form</u> (Word 53kb)

#### Do we use 'cookies'?

'Cookies' are small pieces of information sent by a web server to a web browser, which enables the server to collect information from the browser. Essentially it takes the form of a small text file deposited on your device's storage.

We use cookies to ensure that you can interact with our websites successfully, to identify you when you visit our websites and to keep track of your browsing patterns. The use of cookies does not give us access to the rest of your computer.

We may record information including (but not limited to) the website pages you visit, time spent on the website, the type of device and browser you use, and how you came to the website (e.g. did you click a link in an email, advert or find us through a search engine) and how you use our website.

If you want to prevent our cookies being stored on your computer in future, you may do so by referring to your Internet browser's instructions. You can do this by clicking on the "Help" menu. Please note, however, that if you disable our cookies you may not be able to access certain services or facilities on our sites and your use of our sites may be restricted. Further information on deleting or controlling cookies is available at <a href="https://www.aboutcookies.org">www.aboutcookies.org</a>.

Further information on what cookies we use is available on our dedicated cookies page.

#### Your debit and credit card information

If you use your credit or debit card to donate to us, buy something or pay for a registration online or over the phone, we will ensure that this is done securely and in accordance with the Payment Card Industry Security Standard. Find out more about <u>PCI DSS standards</u>.

If you provide your card details to make a donation by phone, only staff who are authorised and trained to process payments or deal with troubleshooting queries should be able to collect or see your card details.

In some cases, Brooke stores account and sort code details for a short period following the completion of your transaction. We do this for troubleshooting purposes. We then securely destroy card details and validation codes.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may not be able to enter into a contract with you or have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## How long will you keep 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.

Details of retention periods for different aspects of your personal data are available in our document and record retention and destruction procedures. You can request that we send you extracts relevant to your query if you contact us.

### Hyperlinks on this website

The Brooke website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including policies on their use of cookies. They will govern the use of information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility for the privacy practices of such third party websites and your use of such websites is at your own risk. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### Contact us

If you are a supporter we only want to send you communications that are of genuine interest and relevant to you. You are in control of how we use your personal data for marketing and fundraising purposes. Simply call our supporter care team on 020 7470 9393 on any weekday or write to them at Supporter Care, Brooke, 2nd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3A 2BJ, and they can update your preferred communication channel, and give you control over of the types of fundraising communications that you receive. Alternatively, you can email them at <a href="mailto:info@thebrooke.org">info@thebrooke.org</a> or use our website to contact us.

Please follow the instructions in our communications if you wish to change your preferences at any time. You can also send us any completed donation form with your preferences updated or by ticking the box asking if you wish to cease receiving communications.

If you have indicated that you do not wish to be contacted by us for marketing purposes, we will retain your details on a 'do not contact' list to help ensure that we do not contact you accidentally. However, we may still need to contact you if you carry on dealing with us, including (but not limited to):

- Processing a donation you make or any continuing Direct Debit;
- Providing you with information you need in order to participate in an activity or event for which you have registered;
- Explaining and providing an apology where we have made a mistake; and
- Dealing with future legal claims in connection with a contract we have with you.

If you have any queries about this privacy statement please contact the Legal Department, Brooke, 2nd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3A 2BJ or email dataprotection@thebrooke.org.

## Changes to our privacy statement

Any changes we may make to our privacy statement in the future will be posted on this page and, where appropriate, notified to you by email or post. Please check back frequently to see any updates or changes to our privacy statement. Historic versions of our previous privacy statements can be obtained by writing to the Legal Department using the contact details above.

## What to do if you are not happy?

In the first instance, please talk to us directly so we can help resolve any problems or query. Our supporter care team can help if you are a supporter. Please contact us. Alternatively, you can write to us using this email address <a href="mailto:dataprotection@thebrooke.org">dataprotection@thebrooke.org</a>

You also have the right to contact the <u>Information Commissioners Office</u> (ICO) if you have any concerns about how your personal data has been handled. You can use the link above or call them on 0303 123 1113.

If you do not wish to hear from us you can register with the <u>Fundraising Preference Service</u> (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. Use the link above, or you can call them on 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

Last updated March 2023