



Privacy Notice

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I. About this Privacy Notice

Welcome to the Zoë's Place Trust Privacy Notice. We know that your privacy is very important to you, and we promise that your privacy and your personal data is even more important to us. 'Personal data' broadly means any information about an individual from which that person can be identified. We want everyone who supports Zoë's Place Trust, or who comes to us for support, to feel confident about how any personal data they share will be looked after or used.

This Privacy Notice tells you how Zoë's Place Trust collects and processes your personal data through your use of this website or any other means. It also tells you about your data privacy rights and how the law protects you. We may undertake additional processing which is subject to separate Privacy Notices and we will draw these to your attention where this is the case.

Zoë's Place Trust (referred to in this Notice as "we" "our" "us" "the Organisation" "Trust" "Charity") will be the 'data controller' which means that we (in conjunction with other parties where applicable) will be responsible for deciding how your personal data is used and for ensuring that it is used in compliance with data protection law (UK GDPR and Data Protection Act 2018). Zoë's Place Trust is the controller of and responsible for the Zoë's Place Trust website.

We have additional protections in relation to the healthcare data of those who use our hospice services; please contact our Data Protection Officer (email dpo@zoes-place.org.uk) if you have any questions about the use of personal clinical data. We have separate Privacy Notices explaining how we look after the personal data of our employees, and of job applicants.

This website is not intended for children and we do not knowingly collect data relating to children through the website.

Keeping us informed of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data (for example your name or any of your contact details) changes during your relationship with us.

What happens if you do not provide your 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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Changes to this Notice

We may change our Privacy Notice so please check back from time to time. This Privacy Notice was last updated in August 2021.

Third-party links

The Zoë's Place Trust website may include links to other sites, plug-ins and applications that are not owned or managed by us. We cannot be held responsible for the privacy of information collected by websites not managed by us, and we encourage you to read the Privacy Notice of every website you visit.

2. Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions or concerns about this Notice or how we handle your personal data, please contact the DPO.

Email: dpo@zoes-place.org.uk

Telephone: 01926 889633

Post: Data Protection Officer, Zoë's Place Trust, Upper Ground Floor
15 Dormer Place, Leamington Spa CV32 5AA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO). The ICO is the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please contact our Data Protection Officer in the first instance.

3. What data do we collect about you?

We may collect, use, store and transfer different types of personal data about you and we have grouped these as follows:

- a) **Identity:** may include first name, last name, maiden name, username or similar identifier, marital status, title, date of birth, gender, NHS number (in the case of service users).
- b) **Contact:** may include postal address, email address, telephone numbers, and emergency contacts.
- c) **Financial:** may include bank account and payment card details.
- d) **Transaction:** may include details about payments to and from you and details of any services you have asked us to provide, or which you provide to us.
- e) **Health and care:** includes details about health conditions, medications, care plans.
- f) **Marketing preferences:** includes your preferences in receiving news, details of fundraising events and activities, and your communication preferences (how you want to be contacted).
- g) **Profile:** may include preferences, interests, feedback and survey responses, and (if appropriate at a future time) may include username and password.
- h) **Usage:** may include information about how you use our website, products and services.
- i) **Technical:** may include internet protocol (IP) address, login data, browser type and version, time zone and location, browser plug-in details, operating system and platform and other technology on the devices you use to access this website.

We collect **Special Category data** where appropriate (for example, for the purposes of equal opportunities monitoring, and the provision of health and care services). This data may include details about health, family circumstances, and ethnic background.

We collect, use and share **Aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

4. How do we collect your personal data?

We use different methods to collect data from and about you including:

4.1 Direct interactions: You may give us your personal data by filling in forms or by corresponding with us by post, phone, email, in person or otherwise in situations including but not limited to:

- enquiring about our hospice services
- applying for a volunteering opportunity
- supplying goods or services to us
- making a donation to us
- subscribing to our publications
- purchasing something from us
- registering with us for an event
- providing optional feedback – for example when you visit our website

4.2 Third party or publicly available sources: We may receive personal data about you from various third parties and public sources, including:

- analytics providers
- search information providers

4.3 We may receive **Contact, Financial** and **Transaction** data from providers of technical, payment and delivery services and credit search services.

4.4 We may receive **Identity** and **Contact** data from publicly available sources such as Companies House.

4.5 We may receive **Identity, Contact** and special category data including health and care data from partner health care providers (if you are a service user).

4.6 Automated technologies: As you interact with our website, we may automatically collect Technical Data and this is done by using 'cookies'. A cookie is a small file which is downloaded onto your device (e.g. laptop, mobile or tablet) when you visit a website. They allow websites to recognise your device so that the sites can work better and they also gather information about how you use the site. For more information, please see Section 12 in this Notice.

5. How we use your personal data

Legal bases for processing your data

We will only use your personal data when the law allows us to. There are six legal bases on which we can process your data but the ones below are those which will most commonly apply:

- **Contract** means processing your data where it is necessary for the performance of a contract we have entered with you, or are about to enter.
- **Legal obligation** means processing your personal data where we need to comply with a legal or regulatory obligation that we are subject to.
- **Legitimate interest** is where it's necessary for our legitimate interests (or those of a third party) and where your interests and fundamental rights do not override those.

It is in the interest of our Organisation in conducting and managing our charitable purposes to enable us to give you the best service, the best and most secure experience as well as meeting our objectives. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Consent: we generally do not rely on Consent as a legal basis for processing your personal data. However we may ask for your consent in relation to certain marketing and communications. We do not use any third-party direct marketing communications.

Change of purpose

We will only use your personal data for the purposes for which we collected it (see How we use your personal data: summary table), unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If you would like an explanation of why 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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use your personal data: summary table

The situations in which we will process your personal information are listed in the table below. Note that some of the legal bases for processing will overlap and there may be several grounds which justify our use of your personal information. Please contact the Data Protection Officer (dpo@zoes-place.org.uk) if you have any questions about a specific lawful ground we are relying on to process your data.

5a. How we use your personal data: summary table

Situation	Type of data	Legal bases for processing
<p>Suppliers: To register and interact with you as a supplier, place and manage orders, make payments</p>	<ul style="list-style-type: none"> • Identity, Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Contract • Legitimate interest
<p>Donors/supporters: To register and interact with you as (including but not limited to): a donor, newsletter subscriber, supporter, customer (purchase of merchandise).</p> <p>To keep you informed of, or enable you to take part in, a fundraising event, competition, or survey.</p> <p>To make suggestions and recommendations about services, events and activities that may be of interest to you.</p>	<ul style="list-style-type: none"> • Identity, Contact • Financial • Transaction • Marketing preferences • Profile • Usage • Technical 	<ul style="list-style-type: none"> • Consent – when you opt-in to receiving information from us. • Contract • Legitimate interest (<i>to further our charitable objectives and generate income for the Trust; to study ways that supporters engage with our Organisation and grow this support</i>)
<p>Volunteers: To register you as a new or potential volunteer.</p>	<ul style="list-style-type: none"> • Identity, Contact 	<ul style="list-style-type: none"> • Contract • Legitimate interest (<i>to further our charitable objectives</i>)
<p>Service users: To register you as a service user or family member of a service user, and provide you and your family with care and support services.</p>	<ul style="list-style-type: none"> • Identity, Contact • Health & Care 	<ul style="list-style-type: none"> • Contract • Legal • Legitimate interest (<i>to further our charitable objectives</i>)
<p>Health and care providers: To interact with you as an organisation involved in the care or funding of service users (including our management of patient care, management of payments, fees and charges; collection and recovery of money owed to us).</p>	<ul style="list-style-type: none"> • Identity, Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Contract • Legitimate interest (<i>to further our charitable objectives, manage payments and charges</i>)
<p>All: To manage our relationship with you, including notifying you about changes to our terms, and to this Notice.</p>	<ul style="list-style-type: none"> • Profile • Marketing preferences 	<ul style="list-style-type: none"> • Contract • Legal obligation • Legitimate interest (<i>to keep our records updated and keep you up to date with our policies and procedures</i>)
<p>All: To administer and protect our Organisation and this website (including troubleshooting, testing, maintenance, support; analysis, reporting and hosting of data).</p>	<ul style="list-style-type: none"> • Identity, Contact • Technical 	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests (<i>to provide secure administrative and IT services; prevent fraud; also in the context of a reorganisation or restructuring exercise</i>)
<p>All: To use data analytics to deliver personalised and improved website content, marketing and services and improve relationships with service users and supporters.</p>	<ul style="list-style-type: none"> • Identity, Contact • Profile • Usage • Marketing preferences • Technical 	<ul style="list-style-type: none"> • Legitimate interest (<i>to understand the effectiveness of, and improve, our website content and to study how people engage with us.</i>)
<p>All: CCTV images and recordings.</p>	<ul style="list-style-type: none"> • Identity • Special Category data 	<ul style="list-style-type: none"> • Legitimate interest (<i>to keep our premises secure; health & safety of our staff, service users and visitors</i>)

6. Marketing communications

We use different types of data to decide which activities, events, services and news may be of interest to you, and we keep you informed of these through 'marketing communications'. You will receive these communications from us if you have requested information, purchased merchandise, or provided us with your details (for example when you entered a competition or registered for an event) and if you have opted in to receive those communications.

You can ask us to stop sending you marketing communications, or change your communication preferences, at any time. To do this please email the Data Protection Officer at dpo@zoes-place.org.uk. Please note that if you choose to stop receiving marketing communications, we may still need to retain personal data provided to us – for example as a result of provision of a service or other transactions.

We will not share your personal data with any company or other organisation outside of Zoë's Place Trust for marketing purposes.

7. How we keep your personal data secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. How long do we retain your personal data?

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 Data Retention Policy which you can request from us by contacting us.

9. Sharing data with third party providers

In order to provide you with the best service possible we may need to share your information with UK-based third party service providers who are authorised to act on our behalf. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our third-party service providers 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.

9.1 Third party service providers

- Providers of IT and system administration services acting as processors.
- Providers of occasional mailing services, acting as processors - for example for an appeal mailing or similar.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services and allow us to meet our professional obligations.
- HM Revenue & Customs, regulators (eg Care Quality Commission), law enforcement agencies and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Other health and care organisations acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Those authorised by you or acting in a legal capacity on your behalf or with Power of Attorney.
- Third parties to whom we may choose to transfer, or merge parts or all of our Organisation or our assets. 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 Notice.

10. Your data privacy rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Your rights include:

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email the Data Protection Officer at dpo@zoes-place.org.uk.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

II. Transferring data internationally

We will only transfer your personal data outside the European Economic Area (EEA) if:

- you specifically ask us to do so;
- the data is contained on a mobile device that is taken outside the EEA to enable us to maintain contact with you and we will ensure that it only processed in accordance with the rules applicable within the UK and maintain the same level of security.

If we transfer data outside of the EEA at your request you will need to ensure that any country outside of the EEA have sufficient safeguards to protect your data.

If a third party requests the transfer of your data outside of the EEA we will advise you of this at the time so that you can decide whether or not the information may be passed to them. Before making that decision you should make yourself aware what safeguards are in place to protect your data.

12. Cookies

A cookie is a small text file which your browser stores on your device. Cookies are transferred to your device's permanent storage when you visit our website to allow the site to recognise you when you visit our website again and to enable us to improve your use of the site.

Cookies may be temporary (or "session") cookies, which are only in use while you visit our website and are deleted when you close your browser, or permanent cookies, which stay on your device's permanent storage after you leave our website until you delete them manually or your browser deletes them after a period of time.

We may use temporary cookies in order to remember you as you use our website, but we also allow third parties (particularly Google) to use analytical cookies (both temporary and permanent) on our website to compile aggregate information about the areas of our website that are visited most frequently.

Most web browser settings are set for you to accept both our own cookies and third party cookies. However, you are able to adjust those settings (in relation to both our own cookies and those of third parties) to accept the cookies, to prompt you to accept or refuse a cookie each time one is sent, or to reject all cookies outright. We recommend that, for the highest functionality of the website, you accept both our own cookies and third party cookies and these can be changed in your browser settings. We use three categories of cookies:

Essential cookies - these cookies are essential in order to enable you to move around the website and use its features, such as signing up to receive emails from us.

Performance cookies - Google Analytics collects information about how you use our site. No personal information that identifies you is kept. Google Analytics purely tracks visitation behaviour and user habits on our website.

Functionality cookies - these cookies allow our website to remember the choices you make as you browse the site. They provide more enhanced and personalised features. The information collected is anonymised and the cookies cannot track your browsing activity on other sites once you leave our site.